Pennsylvania
Department of Environmental Protection

SOUTHWEST REGIONAL OFFICE
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0110663**
Facility Type	**Sewage**	APS ID	**923532**
Major / Minor	**Major**	Authorization ID	**1374225**

NPDES PERMIT FACT SHEET ADDENDUM

Applicant and Facility Information

Applicant Name	**Cresson Borough Municipal Authority Cambria County**	Facility Name	**Cresson Borough STP**
Applicant Address	631 Second Street	Facility Address	1 Street Helens Lane
	Cresson, PA 16630		Cresson, PA 16630
Applicant Contact	Mark Scowden	Facility Contact	Same as applicant
Applicant Phone	(814) 886-4022	Facility Phone	Same as applicant
Client ID	161502	Site ID	531246
SIC Code	4952	Municipality	Cresson Borough
SIC Description	Trans. & Utilities - Sewerage Systems	County	Cambria
Date Published in PA Bulletin	February 24, 2024	EPA Waived?	No
Comment Period End Date	March 25, 2024	If No, Reason	Major Facility

Purpose of Application: Application for a renewal of an NPDES permit for discharge of treated Sewage

Internal Review and Recommendations

The draft permit was issued on 2/7/2024. The public notice was published in the PA Bulletin on 2/24/2024. The following response was received on 3/11/2024 from EPA during the comment period which ended on 3/25/2024.
These comments and responses were shared with the applicant via Department's email on 3/26/2024. The applicant responded back on May 9 and May 15, 2024 (see page 8).

EPA Comment no. 1: We offer the following comments on WET:

a. There were four endpoint failures in the WET test summary provided in the fact sheet which, as stated, represents reasonable potential (RP) for WET. There was no indication in the fact sheet that the STP has identified the source of toxicity, conducted a toxicity reduction evaluation (TRE) and addressed these reoccurring failures. As discussed in a phone call with PADEP on March 6, 2024, PADEP may look into this further.

Response : DEP shared EPA comments with the applicant and their response was (see pages 8-13) that they identified the toxicity within the 2019 & 2020 WET samplings as a contamination due to Bis 2 Ethyl hexyl phthalate, which was introduced as a new WQBEL parameter during the previous permit. Beside the reviewed TRE progress reports (see page 15 of the first draft permit factsheet under Bis(2-Ethylhexyl) Phthalate Section), via email on May 15, 2024, the authority explained their actions to control the contamination by modifying the sampling procedure. Samples collected after modifications did not produce a reasonable potential for Bis 2 Ethyl hexyl phthalate and the reviewed DMRs didn't show any limits violations (see page 15 of the first draft factsheet Under Reasonable Potential Section). Additionally, 2024 WET results are all "pass". Using the last four years of WET sampling (2021-2024), the DEP WET spreadsheet produced no reasonable potential with no

Approve	Return	Deny	Signatures	Date
X			Hazim Aldalli / Environmental Engineering Specialist	July 26, 2024
X			Mahbuba Iasmin, Ph.D., P.E./ Environmental Engineering Manager	September 27, 2024

Internal Review and Recommendations

limits. The facility-specific Target In-Stream Waste Concentration (TIWCc) will not change from the first draft with the value of 97% and a dilution series of 24%, 49%, 73%, 97%, and 100%. (See page 21).

b. EPA regulations at 40 C.F.R. 122.44(d)(1)(v) require NPDES permits to contain WET limits where a discharge has been shown to cause, have the reasonable potential to cause, or contribute to an in-stream excursion of a narrative criterion unless the permitting authority demonstrates chemical-specific limits are appropriate to address the toxicity. As discussed in the permit writer's manual (page 6-40), chemical-specific limits may be appropriate when the permitting authority has been able to determine the specific pollutants are the source of toxicity. The fact sheet states PADEP believes the new toxic WQBELs (copper, free cyanide, and carbon tetrachloride) will likely control the toxicity noted in the effluent; however, the basis for that statement is unclear and it does not appear the demonstration required by the regulation has been made. EPA's Technical Support Document, March 1991, Section 3.3.7, provides some guidance on this scenario: "To make this demonstration that chemical-specific limits are sufficient, additional effluent information will be needed. EPA recommends that the discharger conduct a toxicity identification evaluation to identify the causative agent(s) in the effluent. Where the permitting authority determines that the demonstration required by 40 CFR 122.44(d)(1)(v) has been made, limits on whole effluent toxicity need not be imposed."
Unless a demonstration can be made that one or several of those specific pollutants are the source of toxicity, limits for WET must be imposed in the permit. In addition, whether WET limits or chemical-specific permit limits are ultimately imposed in the permit, because PADEP has determined that there is RP for WET, EPA would recommend quarterly WET testing be imposed in the permit.

Response : As stated in Response to Comment 1.a, the permittee identified Bis 2 Ethyl hexyl phthalate as a reason for 2019 and 2020 WET test failures. In May 2024, the permittee conducted additional sampling for the newly proposed parameters in the Draft Permit 1 which (included Copper, Carbon Tetrachloride, and Free Cyanide) in addition to sampling for Bis 2 Ethyl hexyl phthalate. All parameters were reported "non-detect" following DEP's Quantitation Limits (QLs). Additionally, 2024 WET results were included in WET evaluation following PADEP's WET SOP (SOP No. BPNPSM-PMT-031, Version 1.4) and no WET limits were recommended (see page 21). Therefore, annual WET testing will be continued in the revised Draft Permit.

c. The permit does not include the updated TIWC and dilution series from the fact sheet as identified in the email correspondence on February 20, 2024.

Response : DEP acknowledges the comment, Part C.IV.A.3 of the final permit will have the dilution series and TIWC updated to reflect the renewal application WET analysis results as indicated in DEP response to the Comment 1.a.

Comment 2: In the February 20, 2024 email correspondence between EPA and PADEP, EPA noted the fact sheet incorrectly used the pretreatment term categorical in describing two industrial users. EPA recommends removing the term categorical as the industrial discharges are not categorical dischargers. It was also noted the permittee didn't disclose the two industrial dischargers in the application.

Response : DEP acknowledges the comment. The applicant informed DEP when asked about this comment that Sheetz Corp. store is no more discharging to the Cresson STP, and Norfolk Southern discharge information will be updated through the 2024 CH94 report and the upcoming renewal application (See page 14).

Total Copper

The new Site Specific Criteria Study (SSCS) and Toxicity Reduction Evaluation (TRE) with corrosion control feasibility study requirements for Total Copper were inadvertently excluded in the original Draft Permit. Part C112 A and Part C113 have been included in the revised Draft Permit.

PFAS

Pursuant to 25 Pa. code § 92a.61(b), annual monitoring for PFAS-related compounds (i.e., PFOA, PFOS, HFPO-DA or PFBS) has been imposed at Outfall 001 to determine if PFAS will be a pollutant of concern in accordance with PADEP SOP

Internal Review and Recommendations
No. BCW-PMT-033 revised February 5, 2024 under Section G.3. Additionally, a footnote has been added to Part A of the revised Draft Permit that states, "*The permittee may discontinue monitoring for PFOA, PFOS, HFPO-DA, and PFBS if the results in 4 consecutive monitoring periods indicate non-detect results at or below Quantitation Limits of 4.0 ng/L for PFOA, 3.7 ng/L for PFOS, 3.5 ng/L for PFBS and 6.4 ng/L for HFPO-DA. When monitoring is discontinued, permittees must enter a No Discharge Indicator (NODI) Code of "GG" on DMRs*." Issuance of the permit re-draft is recommended.

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 End of Thirty-Sixth (36th) Month Following Permit Issuance.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (µg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Maximum	Instant. Maximum		
Free Cyanide	Report	XXX	XXX	Report	XXX	Report Daily Max	1/week	Grab
Total Copper	0.53 Avg Qrtly	0.94 Daily Max	XXX	42.0 Avg Qrtly	75.0 Daily Max	XXX	1/quarter	8-Hr Composite
Carbon Tetrachloride	Report	XXX	XXX	Report	XXX	Report Daily Max	1/week	8-Hr Composite

Compliance Sampling Location: Outfall 001.

Other Comments: None.

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: Beginning of Thirty Seventh (37th) Month Following Permit Issuance through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (ug/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Maximum	Instant. Maximum		
Total Copper	0.18	XXX	XXX	14.4	21.6 Daily Max	XXX	1/week	8-Hr Composite
Free Cyanide	0.05	XXX	XXX	4.14	6.21 Daily Max	XXX	1/week	Grab
Carbon Tetrachloride	0.007	XXX	XXX	0.55	0.82 Daily Max	XXX	1/week	8-Hr Composite

Compliance Sampling Location: Outfall 001.

Other Comments: None.

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) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Weekly Average	Minimum	Average Monthly	Weekly Average	Instant. Maximum		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	Continuous	Recorded
pH (S.U.)	XXX	XXX	6.0	XXX	9.0 Max	XXX	1/day	Grab
Dissolved Oxygen	XXX	XXX	6.0	XXX	XXX	XXX	1/day	Grab
Carbonaceous Biochemical Oxygen Demand (CBOD5) Nov 1 - Apr 30	312.75	469.12	XXX	25.0	37.5	50	2/week	8-Hr Composite
Carbonaceous Biochemical Oxygen Demand (CBOD5) May 1 - Oct 31	250.2	375.3	XXX	20.0	30.0	40	2/week	8-Hr Composite
Biochemical Oxygen Demand (BOD5) Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	2/week	8-Hr Composite
Total Suspended Solids	375.3	562.95	XXX	30.0	45.0	60	2/week	8-Hr Composite
Total Suspended Solids Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	2/week	8-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
Ultraviolet Light Intensity (mw/cm^2)	XXX	XXX	Report	XXX	XXX	XXX	1/day	Recorded
Ammonia-Nitrogen Nov 1 - Apr 30	31.3	XXX	XXX	2.5	XXX	5.0	2/week	8-Hr Composite
Ammonia-Nitrogen May 1 - Oct 31	18.76	XXX	XXX	1.5	XXX	3.0	2/week	8-Hr Composite
Total Boron	Report	XXX	XXX	Report	Report Daily Max	XXX	1/week	8-Hr Composite

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Weekly Average	Minimum	Average Monthly	Weekly Average	Instant. Maximum		
Dissolved Iron	Report	XXX	XXX	Report	Report Daily Max	XXX	1/week	8-Hr Composite
Total Silver	Report	XXX	XXX	Report	Report Daily Max	XXX	1/week	8-Hr Composite
Total Zinc	Report	XXX	XXX	Report	Report Daily Max	XXX	1/week	8-Hr Composite
E.Coli (No./100 ml)	XXX	XXX	XXX	XXX	XXX	Report	1/month	Grab
Total Nitrogen	XXX	XXX	XXX	Report Daily Max	XXX	XXX	1/quarter	8-Hr Composite
Total Phosphorus	XXX	XXX	XXX	Report Daily Max	XXX	XXX	1/quarter	8-Hr Composite
Bis(2-Ethyl-hexyl) Phthalate (µg/L)	XXX	XXX	XXX	1.45	XXX	2.5 Daily Max	1/month	8-Hr Composite
Aluminum, Total	XXX	XXX	XXX	Report Daily Max	XXX	XXX	1/quarter	8-Hr Composite
Iron, Total	XXX	XXX	XXX	Report Daily Max	XXX	XXX	1/quarter	8-Hr Composite
Manganese, Total	XXX	XXX	XXX	Report Daily Max	XXX	XXX	1/quarter	8-Hr Composite
Hardness (as $CaCO_3$)	XXX	XXX	XXX	Report Daily Max	XXX	XXX	1/quarter	8-Hr Composite
PFOA* (ng/L)	XXX	XXX	XXX	Report Daily Max	XXX	XXX	1/year	Grab
PFOS* (ng/L)	XXX	XXX	XXX	Report Daily Max	XXX	XXX	1/year	Grab
HFPO-DA* (ng/L)	XXX	XXX	XXX	Report Daily Max	XXX	XXX	1/year	Grab
PFBS* (ng/L)	XXX	XXX	XXX	Report Daily Max	XXX	XXX	1/year	Grab

** The permittee may discontinue monitoring for PFOA, PFOS, HFPO-DA, and PFBS if the results in 4 consecutive monitoring periods indicate non-detect results at or below Quantitation Limits of 4.0 ng/L for PFOA, 3.7 ng/L for PFOS, 3.5 ng/L for PFBS and 6.4 ng/L for HFPO-DA. When monitoring is discontinued, permittees must enter a No Discharge Indicator (NODI) Code of "GG" on DMRs.*

Compliance Sampling Location: Outfall 001.
Other Comments: N/A.

Aldalli, Hazim

From: Stu Sibold <ssibold@eadsgroup.com>
Sent: Thursday, May 9, 2024 3:06 PM
To: Aldalli, Hazim
Cc: Iasmin, Mahbuba; cressonwwtp@gmail.com
Subject: [External] RE: Cresson Borough STP Draft Permit, PA0110663
Attachments: Extracted pages from ESL080619-Cresson Borough.pdf

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Mr. Aldalli - We met with our local laboratory representative on Wednesday May 1, 2024 and have had two conference calls subsequently with them. We discussed the recent WET test results that were submitted to PaDEP with our NPDES Permit Renewal Application or subsequent to the original application filing date (for the 2023 WET Test Report).

The last six years of WET testing including the most recent WET test of July 31, 2023 contained summaries which concluded that all testing resulted in "Pass" for survival and for reproduction/growth for the two species tested except for year 2020 for C.dubia reproduction. The table below summarizes those WET findings:

Species	2018	2019	2020	2021	2022	2023
C. dubia survival	Pass	Pass	Pass	Pass	Pass	Pass
C. dubia reproduction	Pass	Pass	Fail	Pass	Pass	Pass
P. promelas Survival	Pass	Pass	Pass	Pass	Pass	Pass
P. promelas Growth	Pass	Pass	Pass	Pass	Pass	Pass

We think USEPA ought to be aware of the results of the 2023 WET testing. That means we have 3 years of passing results.

EnviroScience lab personnel made me aware that at least one of the 2019 end point failures cited in the Fact Sheet for P. promelas was deemed a fail because the 99 % effluent series showed fail results while the 100 % effluent series showed passing results. This seems unusual as one would expect 99 % effluent and 100 % effluent to show very similar results. The 100 % effluent should be the most stressful environment for the P. promelas yet the lab results differ significantly from the 99 %. EnviroScience personnel apparently thought so and considered the 99 % result as an anomaly and used the 100 % result on which to base their conclusion. See attached pages showing this situation.

That said, we (Cresson) are getting ready now to do the sampling for this year's WET testing during the 3 rd week of May. I have asked the operators and the lab to collect samples and test for each day of the WET sampling to also test for copper, free cyanide, carbon tetrachloride and Bis 2 ethyl hexyl phthalate so trying to be proactive. If we have a failure for the WET testing for 2024, then I will have a lab result of the same plant effluent for copper, free cyanide, carbon tetrachloride and Bis 2 ethyl hexyl phthalate.

It seems to me that the last 3 years of passing WET results should be indicative of a non-toxic effluent at Cresson. We wonder if conducting a toxicity identification evaluation will result in anything meaningful if for 3 years straight, the WET results show passing. The problem if indeed there was one, was last detected in 2020. We are willing to perform some

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additional sampling of certain chemicals or perhaps go to twice a year WET testing for another year or two. If we get 2 more years of WET tests passing then we could drop back to once per year WET Testing.

Thank you for the opportunity to comment.

Stuart W. Sibold PE
EADS Group, Inc.
1126 Eighth Avenue
Altoona, PA. 16602

From: Aldalli, Hazim <haldalli@pa.gov>
Sent: Wednesday, April 24, 2024 10:38 AM
To: Stu Sibold <ssibold@eadsgroup.com>
Cc: Iasmin, Mahbuba <moiasmin@pa.gov>; cressonwwtp@gmail.com
Subject: RE: [External] Cresson Borough STP Draft Permit, PA0110663

Mr. Sibold,

Please let me know if you still have any questions/comments that I can answer to have your response to EPA and DEP comments on the draft permit.

Thanks,

Hazim Aldalli| Environmental Engineer
Department of Environmental Protection | Clean Water
South West Regional Office Building
400 Waterfront Drive | Pittsburgh, PA 15222
Phone: (412) 442-4117

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Please use the link below to view the webpage, get instructions, and submit documents:
https://www.dep.pa.gov/DataandTools/ElectronicSubmissions/Pages/default.aspx

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From: Stu Sibold <ssibold@eadsgroup.com>
Sent: Wednesday, March 27, 2024 10:51 AM
To: Aldalli, Hazim <haldalli@pa.gov>
Cc: Iasmin, Mahbuba <moiasmin@pa.gov>; cressonwwtp@gmail.com
Subject: RE: [External] Cresson Borough STP Draft Permit, PA0110663

Mr. Aldalli - the new email address at the Cresson sewage plant is :

cressonwwtp@gmail.com

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please revise your contact information for the plant operator, Mark Scowden.

Stuart Sibold PE

From: Aldalli, Hazim <haldalli@pa.gov>
Sent: Tuesday, March 26, 2024 1:43 PM
To: Stu Sibold <ssibold@eadsgroup.com>; Mark Scowden (cressonwwtp@hotmail.com) <cressonwwtp@hotmail.com>
Cc: lasmin, Mahbuba <moiasmin@pa.gov>
Subject: FW: [External] Cresson Borough STP Draft Permit, PA0110663

Dear Mr. Sibold,

I want to share with you EPA comments regarding the draft renewal permit PA0110663 for Cresson Borough STP, I'd like to have your feedback on Comment 1 for a. & b. Basically EPA wants to have more information about the authority efforts and the work done towards having the WET results back to show "Pass" for the failed endpoints, this determination is based on the new received WET reports for the years 2022 and 2023. Also, based on the new DEP policy (came into effect on March 15) for PFAS monitoring for major permits, the Cresson STP will have PFAS monitoring requirements added to the permit effluent limitations table and a justification in the factsheet. And based on these changes DEP will re-draft the permit.

I will have a phone call with you tomorrow around 10:30 (if your schedule allowed) to discuss these comments further. Please let me know if you can take my call tomorrow, or you want to schedule it for different time and date.

Thanks,

Hazim Aldalli| Environmental Engineer
Department of Environmental Protection | Clean Water
South West Regional Office Building
400 Waterfront Drive | Pittsburgh, PA 15222
Phone: (412) 442-4117

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Please use the link below to view the webpage, get instructions, and submit documents:
https://www.dep.pa.gov/DataandTools/ElectronicSubmissions/Pages/default.aspx

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From: Fulton, Jennifer <Fulton.Jennifer@epa.gov>
Sent: Monday, March 11, 2024 1:52 PM
To: Aldalli, Hazim <haldalli@pa.gov>
Cc: lasmin, Mahbuba <moiasmin@pa.gov>; Furjanic, Sean <sefurjanic@pa.gov>; Schumack, Maria <maschumack@pa.gov>; Moncavage, Carissa (she/her/hers) <Moncavage.Carissa@epa.gov>; Hales, Dana <Hales.Dana@epa.gov>; Camperson, Joseph <Camperson.Joseph@epa.gov>
Subject: [External] Cresson Borough STP Draft Permit, PA0110663

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Hazim,

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:

Cresson Borough STP
Cresson Borough Municipal Authority Cambria County (CBMA)
NPDES Number: PA0110663
EPA Received: February 8, 2024
30-day response due date: March 9, 2024

This is a major permit that discharges to the Little Conemaugh River. EPA has chosen to perform a limited review of the draft permit based on the copper, whole effluent toxicity (WET) and wasteload allocation (WLA) requirements of the approved Kiskiminetas River Basin TMDL. EPA has completed its review and offers the following comments:

1. We offer the following comments on WET:

    a. There were four endpoint failures in the WET test summary provided in the fact sheet which, as stated, represents reasonable potential (RP) for WET. There was no indication in the fact sheet that the STP has identified the source of toxicity, conducted a toxicity reduction evaluation (TRE) and addressed these reoccurring failures. As discussed in a phone call with PADEP on March 6, 2024, PADEP may look into this further.

    b. EPA regulations at 40 C.F.R. 122.44(d)(1)(v) require NPDES permits to contain WET limits where a discharge has been shown to cause, have the reasonable potential to cause, or contribute to an in-stream excursion of a narrative criterion unless the permitting authority demonstrates chemical-specific limits are appropriate to address the toxicity. As discussed in the permit writer's manual (page 6-40), chemical-specific limits may be appropriate when the permitting authority has been able to determine the specific pollutants are the source of toxicity. The fact sheet states PADEP believes the new toxic WQBELs (copper, free cyanide, and carbon tetrachloride) will likely control the toxicity noted in the effluent; however, the basis for that statement is unclear and it does not appear the demonstration required by the regulation has been made. EPA's *Technical Support Document*, March 1991, Section 3.3.7, provides some guidance on this scenario: "To make this demonstration that chemical-specific limits are sufficient, additional effluent information will be needed. EPA recommends that the discharger conduct a toxicity identification evaluation to identify the causative agent(s) in the effluent. Where the permitting authority determines that the demonstration required by 40 CFR 122.44(d)(1)(v) has been made, limits on whole effluent toxicity need not be imposed."

        Unless a demonstration can be made that one or several of those specific pollutants are the source of toxicity, limits for WET must be imposed in the permit. In addition, whether WET limits or chemical-specific permit limits are ultimately imposed in the permit, because PADEP has determined that there is RP for WET, EPA would recommend quarterly WET testing be imposed in the permit.

    c. The permit does not include the updated TIWC and dilution series from the fact sheet as identified in email correspondence on February 20, 2024.

2. In the February 20, 2024 email correspondence between EPA and PADEP, EPA noted the fact sheet incorrectly used the pretreatment term categorical in describing two industrial users. EPA recommends removing the term

categorical as the industrial discharges are not categorical dischargers. It was also noted the permittee didn't disclose the two industrial dischargers in the application.

Please address the above and provide us with any changes to the draft permit and/or fact sheet, if necessary. Please contact Joe Camperson on my staff via telephone at 215-814-5784 or via electronic mail at camperson.joseph@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

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Aldalli, Hazim

From: Stu Sibold <ssibold@eadsgroup.com>
Sent: Wednesday, May 15, 2024 12:00 PM
To: Iasmin, Mahbuba; Aldalli, Hazim
Cc: cressonwwtp@gmail.com
Subject: RE: [External] RE: Cresson Borough STP Draft Permit, PA0110663

Mr. Iasmin - We think that Bis 2 Ethyl hexyl phthalate might have been the reason for the end point failures. Our focus has been our continued efforts to remove infiltration and inflow through sewer lateral replacements and pressure testing of sewer laterals in Cresson Borough. We have successfully removed substantial amounts of infiltration and inflow, perhaps as much as 50,000 gallons per day. Also we did find and remove plastic components from all of our sampling equipment and replace these items with Teflon or glass components to prevent self – contamination of the sampling equipment with Bis-2 ethyl hexyl phthalate leaching from plastic tubing and sample containers. Composite sampling container cleaning procedures were changed and the source of de-ionized distilled water was replaced as part of that process to eliminate possible sources of Bis-2 ethyl hexyl phthalate. These efforts seem to have been successful.

WET Testing results should be available from the laboratory Enviroscience by mid-July 2024. We will forward these results to you as soon as we receive them from the lab. We will keep you apprised in case there are any problems with complying with this schedule.

Stuart W. Sibold PE
EADS Group, Inc.
1126 Eighth Avenue
Altoona, PA. 16602

From: Iasmin, Mahbuba <moiasmin@pa.gov>
Sent: Wednesday, May 15, 2024 11:24 AM
To: Stu Sibold <ssibold@eadsgroup.com>; Aldalli, Hazim <haldalli@pa.gov>
Cc: cressonwwtp@gmail.com
Subject: RE: [External] RE: Cresson Borough STP Draft Permit, PA0110663

Mr. Sibold,

At this time, to be able to respond to EPA comments, we are looking for the reason(s) for past end point failures and what actions were taken to overcome the failures.

We will wait for this year's WET testing results. Please let us know when you expect to submit these results by.

Sincerely,

Mahbuba Iasmin, Ph.D., P.E. | Environmental Engineer Manager
Sewage and Planning Section | Clean Water Program
PA Department of Environmental Protection | Southwest Regional Office
400 Waterfront Drive | Pittsburgh, PA 15222
Phone: 412.442.4102
www.dep.pa.gov

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3800-PM-BCW0009b Rev. 6/2019
Permit Application

Applicant: Mun Auth of Cresson Borough

INDUSTRIAL USER INFORMATION

Complete this section for industrial users (IUs) connected to the sewer system. Two IUs can be recorded per page. Attach additional pages as necessary. See Table 1 of the instructions to determine whether the IU is a "Categorical Industry."

☐ Check here if there are NO industrial users.

☐ Check here if the applicant is implementing an approved pretreatment program administered by EPA.

Date of most recent approval of local limits by EPA: _____

1. Industrial User Name:	Norfolk Southern	2. Categorical Industry? ☐ Yes ☒ No
Address:	Arch street	Applicable Pretreatment (PT) Standard:
Municipality / County:	Cresson / Cambria County	40 CFR Part: _____

3. Description of Industry and Wastewater Characteristics:

Former railroad locomotive switching and car storage yard. Now inactive. Wastewater is now stormwater runoff from the tank containment and from locomotive refueling pans that are no longer in use and were cleaned by Norfolk Southern's environmental cleanup contractor

4. Is this industry a significant industrial user (SIU)? ☐ Yes ☒ No

5. Is this industry a non-significant categorical industrial user (NSCIU)? ☐ Yes ☒ No

6. Does the IU truck or haul waste to the POTW? ☐ Yes ☒ No

7. Has an industrial user permit been issued by the POTW or permittee? ☐ Yes ☒ No

8. Subpart Letter	Subpart Title	9. Wastewater Flows (GPD)	
		Process:	700
		NCCW:	0
		Sanitary:	0
		Other:	0
		Total:	**700 estimated; flow is highly dependent on precipitation**

10. Has the IU been the known or suspected source of any problems at the POTW (e.g., upsets, pass through, interference) in the past four and one-half years? ☐ Yes ☒ No

If Yes, provide an explanation: **IU has an oil/water separator followed by granular activated carbon (GAC) pressure filter to remove contaminants. The existing diesel fuel storage tank was emptied and cleaned out by a licensed environmental firm. Diesel fuel storage tank is now abandoned in place and disconnected. Tank containment exists but is only generating flow when a precipitation event occurs. Nofolk Southern ceased locomotive refueling operations in Cresson in September 2021, 4 years ago at this writing. The only discharges from this IU occur when precipitation occurs and all precipitation-induced flow passes through the oil/water separator and GAC filtration system before it is pumped into the Cresson sewer system.**

11. List any other pollutant(s) with Chapter 93 WQS that may be discharged from the IU and are not identified in Pollutant Groups 1 – 6.

None

1. Industrial User Name:		2. Categorical Industry? ☐ Yes ☐ No
Address:		Applicable Pretreatment (PT) Standard:
Municipality / County:	/	40 CFR Part _____

3. Description of Industry and Wastewater Characteristics:

4. Is this industry a significant industrial user (SIU)? ☐ Yes ☐ No

5. Is this industry a non-significant categorical industrial user (NSCIU)? ☐ Yes ☐ No

6. Does the IU truck or haul wastewater to the POTW? ☐ Yes ☐ No

7. Has an industrial user permit been issued by the POTW or permittee? ☐ Yes ☐ No

8. Subpart Letter	Subpart Title	9. Wastewater Flows (GPD)	
		Process:	
		NCCW:	
		Sanitary:	

- 9 -

Aldalli, Hazim

From: Stu Sibold <ssibold@eadsgroup.com>
Sent: Monday, September 16, 2024 11:01 AM
To: Aldalli, Hazim; cressonwwtp@gmail.com
Cc: Iasmin, Mahbuba; Todd Beiswenger
Subject: [External] RE: Cresson Borough STP Draft Permit PA0110663

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the Report Phishing button in Outlook.

Mr. Aldalli – Sheetz store discontinued the industrial discharge several years ago. They rebuilt the store and removed the car wash and its wastewater treatment system in 2015. I was unaware of this as the Sheetz store is in Cresson Township , not Cresson Borough. We will revise our Chapter 94 Attachment 8 and also the Page 9 of the NPDES permit application.

I have a site visit scheduled with Norfolk Southern for Tuesday Sept 24 at 1:30 pm to view their treatment system and get more particulars/details and perhaps correct or revise the Chapter 94 Attachment 8 information as well as the Page 9 information.

Thanks,
Stuart Sibold

Stuart W. Sibold, PE
Project Manager

814.944.5035 ext. 122
814.935.5035 Mobile
1126 8th Avenue, Altoona, PA 16602

ssibold@eadsgroup.com

From: Stu Sibold <ssibold@eadsgroup.com>
Sent: Monday, September 16, 2024 9:04 AM
To: Aldalli, Hazim <haldalli@pa.gov>; cressonwwtp@gmail.com
Cc: Iasmin, Mahbuba <moiasmin@pa.gov>
Subject: RE: Cresson Borough STP Draft Permit PA0110663

Mr. Aldalli – I have received your email and will respond with update to Page 9 regarding industrial dischargers. Norfolk Southern closed its railroad yard in Cresson a few years ago. I am trying to track down a knowledgeable Norfolk Southern official who can help us with the abandonment/closure of that facility which would have eliminated the industrial connection mentioned.

Thanks,
Stu

1

Stuart W. Sibold, PE
Project Manager

814.944.5035 ext. 122
814.935.5035 Mobile
1126 8th Avenue, Altoona, PA 16602

ssibold@eadsgroup.com

From: Aldalli, Hazim <haldalli@pa.gov>
Sent: Monday, September 16, 2024 8:16 AM
To: Stu Sibold <ssibold@eadsgroup.com>; cressonwwtp@gmail.com
Cc: Iasmin, Mahbuba <mojasmin@pa.gov>
Subject: Cresson Borough STP Draft Permit PA0110663

Mr. Sibold,

In regard EPA comment no. 2, I think Cresson Borough needs to update Page 9 of the renewal application to include the industrial dischargers that were stated within the draft factsheet and in the CH94 report for 2022 under Attachment 8. Please let me know if you have any questions.

Thanks,

Hazim Aldalli| Environmental Engineering Specialist
Department of Environmental Protection | Clean Water
Southwest Regional Office Building
400 Waterfront Drive | Pittsburgh, PA 15222
Phone: (412) 442-4117

DEP accepts permit and authorization applications, as well as other documents and correspondence, electronically through ePermitting and Public Upload with Electronic Payment.
Please use the link below to view the webpage, get instructions, and submit documents:
https://www.dep.pa.gov/DataandTools/ElectronicSubmissions/Pages/default.aspx

2

DEP Whole Effluent Toxicity (WET) Analysis Spreadsheet

Type of Test	Chronic
Species Tested	Ceriodaphnia
Endpoint	Reproduction
TIWC (decimal)	0.99
No. Per Replicate	1
TST b value	0.75
TST alpha value	0.2

Facility Name: Cresson Borough STP

Permit No.: PA0110663

Test Completion Date: 7/26/2021

Replicate No.	Control	TIWC
1	28	36
2	31	
3	27	29
4	31	30
5	25	18
6	25	34
7	26	28
8	29	24
9	24	20
10	23	25
11		
12		
13		
14		
15		
Mean	26.900	27.111
Std Dev.	2.807	5.988
# Replicates	10	9
T-Test Result	3.2963	
Deg. of Freedom	11	
Critical T Value	0.8755	
Pass or Fail	**PASS**	

Test Completion Date: 7/28/2022

Replicate No.	Control	TIWC
1	17	24
2	24	21
3	25	23
4	21	20
5	27	27
6	27	29
7	22	19
8	29	19
9	16	27
10	23	19
11		
12		
13		
14		
15		
Mean	23.100	22.800
Std Dev.	4.254	3.795
# Replicates	10	10
T-Test Result	3.4921	
Deg. of Freedom	17	
Critical T Value	0.8633	
Pass or Fail	**PASS**	

Test Completion Date: 7/24/2023

Replicate No.	Control	TIWC
1	28	31
2	27	34
3	23	0
4	26	39
5	14	22
6	26	33
7	23	35
8	22	36
9	24	37
10	21	33
11		
12		
13		
14		
15		
Mean	23.400	30.000
Std Dev.	4.006	11.499
# Replicates	10	10
T-Test Result	3.3127	
Deg. of Freedom	12	
Critical T Value	0.8726	
Pass or Fail	**PASS**	

Test Completion Date: 6/27/2024

Replicate No.	Control	TIWC
1	26	28
2	27	32
3	23	29
4	19	30
5	27	28
6	17	35
7	25	33
8	24	27
9	24	36
10	31	24
11		
12		
13		
14		
15		
Mean	24.300	30.200
Std Dev.	4.029	3.765
# Replicates	10	10
T-Test Result	7.8436	
Deg. of Freedom	16	
Critical T Value	0.8647	
Pass or Fail	**PASS**	

DEP Whole Effluent Toxicity (WET) Analysis Spreadsheet

Type of Test	Chronic
Species Tested	Ceriodaphnia
Endpoint	Survival
TIWC (decimal)	0.99
No. Per Replicate	1
TST b value	0.75
TST alpha value	0.2

Facility Name
Cresson Borough STP

Permit No.
PA0110663

Test Completion Date: 7/26/2021

Replicate No.	Control	TIWC
1	1	1
2	1	
3	1	1
4	1	1
5	1	1
6	1	1
7	1	1
8	1	1
9	1	1
10	1	1
11		
12		
13		
14		
15		
Mean	1.000	1.000
Std Dev.	0.000	0.000
# Replicates	10	9

T-Test Result
Deg. of Freedom
Critical T Value
Pass or Fail **PASS**

Test Completion Date: 7/26/2022

Replicate No.	Control	TIWC
1	1	1
2	1	1
3	1	1
4	1	1
5	1	1
6	1	1
7	1	1
8	1	1
9	1	1
10	1	1
11		
12		
13		
14		
15		
Mean	1.000	1.000
Std Dev.	0.000	0.000
# Replicates	10	10

T-Test Result
Deg. of Freedom
Critical T Value
Pass or Fail **PASS**

Test Completion Date: 7/24/2023

Replicate No.	Control	TIWC
1	1	1
2	1	1
3	1	1
4	1	1
5	0	1
6	1	1
7	1	1
8	1	1
9	1	1
10	1	1
11		
12		
13		
14		
15		
Mean	0.900	1.000
Std Dev.	0.316	0.000
# Replicates	10	10

T-Test Result
Deg. of Freedom
Critical T Value
Pass or Fail **PASS**

Test Completion Date: 6/27/2024

Replicate No.	Control	TIWC
1	1	1
2	1	1
3	1	1
4	1	1
5	1	1
6	1	1
7	1	1
8	1	1
9	1	1
10	1	1
11		
12		
13		
14		
15		
Mean	1.000	1.000
Std Dev.	0.000	0.000
# Replicates	10	10

T-Test Result
Deg. of Freedom
Critical T Value
Pass or Fail **PASS**

DEP Whole Effluent Toxicity (WET) Analysis Spreadsheet

Type of Test	Chronic
Species Tested	Pimephales
Endpoint	Survival
TIWC (decimal)	0.99
No. Per Replicate	10
TST b value	0.75
TST alpha value	0.25

Facility Name: Cresson Borough STP

Permit No.: PA0110663

Test Completion Date: 7/27/2021

Replicate No.	Control	TIWC
1	0.9	1
2	0.6	1
3	0.9	1
4	0.9	1
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
Mean	0.825	1.000
Std Dev.	0.150	0.000
# Replicates	4	4

T-Test Result	9.6890
Deg. of Freedom	3
Critical T Value	0.7649
Pass or Fail	**PASS**

Test Completion Date: 7/26/2022

Replicate No.	Control	TIWC
1	1	0.9
2	1	1
3	1	1
4	1	1
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
Mean	1.000	0.975
Std Dev.	0.000	0.050
# Replicates	4	4

T-Test Result	17.8623
Deg. of Freedom	3
Critical T Value	0.7649
Pass or Fail	**PASS**

Test Completion Date: 7/25/2023

Replicate No.	Control	TIWC
1	1	1
2	1	1
3	1	1
4	1	1
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
Mean	1.000	1.000
Std Dev.	0.000	0.000
# Replicates	4	4

T-Test Result	
Deg. of Freedom	
Critical T Value	
Pass or Fail	**PASS**

Test Completion Date: 5/28/2024

Replicate No.	Control	TIWC
1	0.9	1
2	0.9	0.8
3	1	0.9
4	1	0.6
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
Mean	0.950	0.825
Std Dev.	0.058	0.171
# Replicates	4	4

T-Test Result	3.3796
Deg. of Freedom	4
Critical T Value	0.7407
Pass or Fail	**PASS**

DEP Whole Effluent Toxicity (WET) Analysis Spreadsheet

Type of Test	Chronic
Species Tested	Pimephales
Endpoint	Growth
TIWC (decimal)	0.99
No. Per Replicate	10
TST b value	0.75
TST alpha value	0.25

Facility Name
Cresson Borough STP

Permit No.
PA0110663

Replicate No.	Test Completion Date 7/27/2021 Control	TIWC
1	0.323	0.438
2	0.336	0.352
3	0.296	0.404
4	0.356	0.399
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
Mean	0.328	0.398
Std Dev.	0.025	0.035
# Replicates	4	4

T-Test Result	7.6063
Deg. of Freedom	5
Critical T Value	0.7267
Pass or Fail	**PASS**

Replicate No.	Test Completion Date 7/26/2022 Control	TIWC
1	0.307	0.35
2	0.284	0.406
3	0.358	0.535
4	0.411	0.484
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
Mean	0.340	0.444
Std Dev.	0.057	0.082
# Replicates	4	4

T-Test Result	4.0901
Deg. of Freedom	5
Critical T Value	0.7267
Pass or Fail	**PASS**

Replicate No.	Test Completion Date 7/24/2023 Control	TIWC
1	0.327	0.437
2	0.342	0.403
3	0.335	0.461
4	0.343	0.404
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
Mean	0.337	0.426
Std Dev.	0.007	0.028
# Replicates	4	4

T-Test Result	12.1521
Deg. of Freedom	3
Critical T Value	0.7649
Pass or Fail	**PASS**

Replicate No.	Test Completion Date 5/28/2024 Control	TIWC
1	0.269	0.539
2	0.283	0.425
3	0.29	0.362
4	0.286	0.342
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
Mean	0.282	0.417
Std Dev.	0.009	0.089
# Replicates	4	4

T-Test Result	4.6203
Deg. of Freedom	3
Critical T Value	0.7649
Pass or Fail	**PASS**

WET Summary and Evaluation

Facility Name	Cresson Borough STP
Permit No.	PA0110663
Design Flow (MGD)	1.5
Q_{7-10} Flow (cfs)	0.0838
PMF_a	1
PMF_c	1

		Test Results (Pass/Fail)			
		Test Date	Test Date	Test Date	Test Date
Species	**Endpoint**	7/26/21	7/28/22	7/24/23	6/27/24
Ceriodaphnia	Reproduction	PASS	PASS	PASS	PASS

		Test Results (Pass/Fail)			
		Test Date	Test Date	Test Date	Test Date
Species	**Endpoint**	7/26/21	7/26/22	7/24/23	6/27/24
Ceriodaphnia	Survival	PASS	PASS	PASS	PASS

		Test Results (Pass/Fail)			
		Test Date	Test Date	Test Date	Test Date
Species	**Endpoint**	7/27/21	7/26/22	7/25/23	5/28/24
Pimephales	Survival	PASS	PASS	PASS	PASS

		Test Results (Pass/Fail)			
		Test Date	Test Date	Test Date	Test Date
Species	**Endpoint**	7/27/21	7/26/22	7/24/23	5/28/24
Pimephales	Growth	PASS	PASS	PASS	PASS

Reasonable Potential? NO

Permit Recommendations

Test Type	**Chronic**
TIWC	**97** % Effluent
Dilution Series	**24, 49, 73, 97, 100** % Effluent
Permit Limit	**None**
Permit Limit Species	