

Application Type Renewal
Facility Type Sewage
Major / Minor Minor

**NPDES PERMIT FACT SHEET
ADDENDUM No. 1**

Application No. PA0115231
APS ID 1074116
Authorization ID 1414890

Applicant and Facility Information

Applicant Name	<u>Woodland Bigler Area Authority</u>	Facility Name	<u>Woodland Bigler Area Authority Wastewater Treatment Facility</u>
Applicant Address	<u>PO Box 27 Woodland, PA 16881-0027</u>	Facility Address	<u>2912 Hogback Hill Mineral Springs, PA 16878</u>
Applicant Contact	<u>Samuel Lansberry</u>	Facility Contact	<u>Dave Stodart</u>
Applicant Phone	<u>(814) 857-2966</u>	Facility Phone	<u>(814) 577-5603</u>
Client ID	<u>77876</u>	Site ID	<u>245832</u>
SIC Code	<u>4952</u>	Municipality	<u>Bradford Township</u>
SIC Description	<u>Trans. & Utilities - Sewerage Systems</u>	County	<u>Clearfield</u>
Date Published in PA Bulletin	<u>January 20, 2024</u>	EPA Waived?	<u>Yes</u>
Comment Period End Date	<u>February 18, 2024</u>	If No, Reason	
Purpose of Application	<u>Application for a renewal of an NPDES permit for discharge of treated sewage</u>		

Internal Review and Recommendations

Comments and Responses



DEP is in receipt of comments dated February 1, 2024 submitted on behalf of Woodland Bigler Area Authority by Gwin, Dobson & Foreman, Inc. The comments have two main contentions: the proposed ammonia-n effluent limits and the proposed monitoring for total zinc and total copper.

1. Ammonia-nitrogen: As constructed and operated, based on historic effluent data, it does not appear that the facility can meet the proposed ammonia-n effluent limits. DEP understands that this would result in immediate noncompliance with the proposed requirements if the permit is issued unchanged from the January 4, 2024 draft. Accordingly, DEP is proposing to establish a compliance schedule at Part C.II of the permit. The proposed condition is as follows:

II. SCHEDULE OF COMPLIANCE

A. The permittee shall achieve compliance with final effluent limitations or terminate this discharge in accordance with the following schedule:

1. Submit plan to achieve compliance Permit Effective Date plus one year
2. Submit WQM application, if necessary Permit Effective Date plus two years
4. Begin construction, if necessary Permit Effective Date plus three years

Approve	Return	Deny	Signatures	Date
X			 Derek S. Garner / Project Manager	February 28, 2024
X			 Nicholas W. Hartranft, P.E. / Environmental Engineer Manager	February 29, 2024

Internal Review and Recommendations

- 5. Quarterly progress reports, if necessary Quarterly beginning at start of construction
 - 6. Commence operation, if necessary, and achieve compliance with effluent limitations One month prior to Permit Expiration Date
- B. If the plan to achieve compliance determines that the permittee will meet ammonia-n effluent limits through means other than construction or installation of new treatment units (e.g., operational changes), then DEP may amend the permit to adjust the compliance schedule, as necessary.
- C. No later than 14 calendar days following a date identified in the above schedule of compliance, the permittee shall submit to DEP a written notice of compliance or non-compliance with the specific schedule requirement. Each notice of non-compliance shall include the following information:
- 1. A short description of the non-compliance.
 - 2. A description of any actions taken or proposed by the permittee to comply with the elapsed schedule requirement.
 - 3. A description of any factors which tend to explain or mitigate the non-compliance.
 - 4. An estimate of the date that compliance with the elapsed schedule requirement will be achieved and an assessment of the probability that the next scheduled requirement will be met on time.

The above schedule requires compliance with effluent limits one month prior to expiration of the permit and sets milestones throughout the permit's term to ensure the process keeps advancing. The schedule also allows DEP to amend the permit should Woodland Bigler Area Authority determine that the limits are achievable without construction of implementation of new treatment units.

2. Total Zinc and Total Copper: As noted in and attached to the fact sheet DEP performed a stream survey of Roaring Run at the location of Outfall 001. The survey concluded that the stream is improving in quality and supports an aquatic community throughout the year. Based on this determination, the Woodland Bigler Area Authority is subject to a water quality-based analysis for the first time. The subsequent modeling recommended reporting requirements for total zinc and total copper. Regardless of the source, the Authority is responsible for monitoring and maintaining effluent quality that does not negatively impact the receiving surface water. Additionally, DEP cannot delay monitoring requirements for possible construction/installation of new treatment alternatives that may or may not come to fruition during the renewed permit's term.

An email dated January 31, 2024 from U.S. EPA states the agency has no comments.

An internal review of the draft permit did not yield any changes to the draft permit.

Summary of Changes

Based on comments from the permittee, DEP has established the abovementioned compliance schedule at Part C.II of the permit. The schedule results in tiered ammonia-n reporting requirements and limits. Ammonia-n reporting will be required up until one month prior to expiration of the permit, after which, the previously proposed effluent limits will become effective.

Recommendation

DEP recommends that the permit is redrafted and published in the PA Bulletin for an additional thirty day commenting period.