Pennsylvania Department of Environmental Protection

Northwest Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0210196**
Facility Type	**Industrial**	APS ID	**1026405**
Major / Minor	**Minor**	Authorization ID	**1332484**

NPDES PERMIT FACT SHEET INDIVIDUAL INDUSTRIAL WASTE (IW) AND IW STORMWATER

Applicant and Facility Information

Applicant Name	**Seneca Landfill Inc.**	Facility Name	**Seneca Landfill**
Applicant Address	PO Box 1080	Facility Address	421 Hartmann Road
	Mars, PA 16046-1080		Evans City, PA 16033-3211
Applicant Contact	Dave Smith	Facility Contact	Nick Krause
Applicant Phone	(724) 625-1511	Facility Phone	724-625-9000
Client ID	25747	Site ID	524239
SIC Code	4953	Municipality	Jackson Township
SIC Description	Trans. & Utilities - Refuse Systems	County	Butler
Date Application Received	October 30, 2020	EPA Waived?	Yes
Date Application Accepted		If No, Reason	

Purpose of Application: Renewal of NPDES permit.

Summary of Review

1.0 General Discussion

This factsheet supports the second draft permit for Seneca Landfill for discharge of treated industrial wastewater from a centralized waste treatment (CWT) facility. A draft permit was issued on August 1, 2025, and published in the PA bulletin on August 16, 2025, but was not finalized due to comments from the permittee and a third-party group. The permit will be re-drafted to address these comments where possible and re-published in the PA bulletin for comments. The comments received are presented in attachments A and B. All limitations and monitoring requirements in the draft permit issued on August 1, 2025, remains in the permit except for the changes discussed in this factsheet. Refer to the factsheet developed in support of the August 1,2025 draft permit for details.

1.1 Public Participation,

DEP will publish notice of 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		*J. Pascal Kwedza* J. Pascal Kwedza, P.E. / Environmental Engineer	October 16, 2025
X		Adam Olesnanik Adam Olesnanik, P.E. / Environmental Engineer Manager	November 4, 2025

1.2 Permittee Comments Discussion

Some of the permittee's comments presented in attachment A are typological and formatting errors and have been addressed where possible in the current draft permit. The receiving stream is not high-quality, it is classified for warm water fishes and is impaired. Other comments relating to permit limits and monitoring requirements are discussed in sections 1.3 to 1.5 in the factsheet below.

1.3 Total Copper and Total Lead

The Permittee wants clarification on how limits for Copper and Lead were determined in the permit. The limits for Lead are water quality-based limits that were established in the existing permit 0.2mg/L average monthly limit (AML) and 0.4mg/L maximum daily limit (MDL). The limits are more stringent than the Lead limit in the ELG (40 CFR § 437.42(d)(1)) (0.283mg/L AML /1.32mg/L MDL). Due to anti-backsliding the ELGs are not applicable. The limits for copper are water quality-based limits that were established in the existing permit 0.54mg/L AML and 1.1mg/L MDL. The water quality-based AML is more stringent than 0.757mg/L in the ELG and will remain in the permit. The MDL in the ELG of 0.865mg/L is more stringent than the water-quality based limit in the draft permit and will be replaced with the ELG in the draft permit.

1.4 TSS Limits

The limits in the existing permit for TSS (AML of 50.2mg/L and MDL of 205mg/L) are the ELG limits for Oil and Grease not TSS and were placed in the permit in error. The proposed limits in the draft permit are the correct ELG limits for TSS see 40 CFR § 437.42(d)(1). The facility was approved as a CWT and should have the technology installed to meet the ELGs for CWT facility. The limit proposed in the draft permit will remain. The facility would have to adjust operations to meet the proposed limitation.

1.5 Footnote 3 Reporting Requirement

Permittee wanted clarification on the 24-hour reporting on in-house laboratory testing since not all parameters on the DMR have this footnote. What are the procedures if the in-house daily bench testing used to adjust the plant's operation exceeds the effluent limitations for parameters with and without footnote #3? All pollutants without footnote 3 are not subject to the reporting requirement.

2.0 Third Party Comments

The summary of the third-party comments and DEP responses are presented below:

Comment 1. Require monthly TDS monitoring with conductivity triggers. Response: DEP conducted reasonable potential analysis on TDS using the maximum reported value in permit and on DMR and the result indicates TDS is not a pollutant of concern. The existing quarterly monitoring is adequate to collect data for further analysis at the next permit renewal.

Comment 2. Expand PFAS monitoring to stormwater outfalls and additional PFAS compounds beyond the four listed. Response: Currently DEP's PFAS monitoring strategy only covers the four listed to collect data to determine if PFAS is present at levels that needs further action. Storm water outfalls will be addressed if it is determined PFAS is a pollutant of concern at the site.

Comment 3. Add event-based stormwater sampling for TDS and PFAS. Response: TDS and PFAS have not been determined as pollutants of concern at the site. The best management practices and controls at the site are adequate to control stormwater, no additional sampling is warranted at this time.

Comment 4. Confirm inclusion of all ELG parameters from 40 CFR 437.42(a). Response: All pollutants applicable to this facility located in 40 CFR 437.42(d)(1) are included in the permit except where water quality-based limits are more stringent.

Comment 5. Clarify treatment sources and residual waste definitions. Response: The main source of influent to the treatment system is the landfill leachate. Residual wastes definitions presented in the application are from the waste management program in charge of approving landfills and the types of waste approved to be accepted into the landfills.

3.0 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" (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	Daily Maximum	Minimum	Average Quarterly	Daily Maximum	Instant. Maximum		
Flow (MGD)	Report	Report	XXX	XXX	XXX	XXX	Continuous	Measured
pH (S.U.)	XXX	XXX	6.0 Daily Min	XXX	9.0	XXX	1/day	Grab
DO	XXX	XXX	4.0 Daily Min	XXX	XXX	XXX	1/day	Grab
TRC	XXX	XXX	XXX	Report Avg Mo	XXX	XXX	1/day	Grab
BOD5	Report	Report	XXX	53.0 Avg Mo	163.0	163	1/week	24-Hr Composite
TSS	Report	Report	XXX	31.0 Avg Mo	60.0	60	1/week	24-Hr Composite
Total Dissolved Solids	XXX	Report	XXX	XXX	Report	XXX	1/quarter	24-Hr Composite
Oil and Grease	XXX	XXX	XXX	15.0 Avg Mo	XXX	30.0	2/month	Grab
Ammonia	Report	XXX	XXX	35.0 Avg Mo	XXX	88	2/month	24-Hr Composite
TKN	XXX	Report	XXX	XXX	Report	XXX	1/quarter	24-Hr Composite
Total Antimony	XXX	Report	XXX	0.206	0.249	0.515	2/quarter	24-Hr Composite
Total Arsenic	XXX	Report	XXX	0.104	0.162	0.26	2/quarter	24-Hr Composite
Total Boron	Report	Report	XXX	Report Avg Mo	Report	XXX	1/month	24-Hr Composite
Total Cadmium	XXX	Report	XXX	0.0962	0.474	0.474	2/quarter	24-Hr Composite

Outfall 001 , Continued (from 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	Daily Maximum	Minimum	Average Quarterly	Daily Maximum	Instant. Maximum		
Total Chromium	XXX	Report	XXX	3.07	15.5	15.5	2/quarter	24-Hr Composite
Total Cobalt	XXX	Report	XXX	0.124	0.192	0.31	2/quarter	24-Hr Composite
Total Copper	0.50	1.0	XXX	0.54 Avg Mo	0.865	1.35	1/week	24-Hr Composite
Total Lead	0.18	0.37	XXX	0.2 Avg Mo	0.4	0.5	1/week	24-Hr Composite
Total Mercury	XXX	Report	XXX	0.0007	0.0023	0.0023	2/quarter	24-Hr Composite
Total Nickel	XXX	Report	XXX	1.45	3.95	3.95	2/quarter	24-Hr Composite
Total Silver	XXX	Report	XXX	0.0351	0.12	0.12	2/quarter	24-Hr Composite
Total Tin	XXX	Report	XXX	0.12	0.41	0.41	2/quarter	24-Hr Composite
Total Titanium	XXX	Report	XXX	0.0618	0.095	0.15	2/quarter	24-Hr Composite
Total Vanadium	XXX	Report	XXX	0.0662	0.22	0.22	2/quarter	24-Hr Composite
Total Zinc	XXX	Report	XXX	0.42	0.5	1.05	2/quarter	24-Hr Composite
o-Cresol	XXX	Report	XXX	0.561	1.92	1.92	2/quarter	24-Hr Composite
2,4,6-Trichlorophenol	XXX	Report	XXX	0.106	0.155	0.265	2/quarter	24-Hr Composite
Phenol	XXX	Report	XXX	1.08	3.65	3.65	2/quarter	24-Hr Composite
Acetone	XXX	Report	XXX	7.97	30.2	30.2	2/quarter	Grab
Acetophenone	XXX	Report	XXX	0.0562	0.114	0.14	2/quarter	Grab
2-Butanone	XXX	Report	XXX	1.85	4.81	4.81	2/quarter	Grab
Dichlorobromo-methane	Report	Report	XXX	Report Avg Mo	Report	XXX	1/month	Grab
p-Cresol	XXX	Report	XXX	0.205	0.7	0.7	2/quarter	24-Hr Composite

Outfall 001, Continued (from 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	Daily Maximum	Minimum	Average Quarterly	Daily Maximum	Instant. Maximum		
Pyridine	XXX	Report	XXX	0.182	0.37	0.455	2/quarter	Grab
PFOA (ng/L)	XXX	XXX	XXX	XXX	XXX	Report	1/quarter	Grab
PFOS (ng/L)	XXX	XXX	XXX	XXX	XXX	Report	1/quarter	Grab
PFBS (ng/L)	XXX	XXX	XXX	XXX	XXX	Report	1/quarter	Grab
HFPO-DA (ng/L)	XXX	XXX	XXX	XXX	XXX	Report	1/quarter	Grab

Compliance Sampling Location: at Outfall 001 (prior to mixing with any other waters)

Comments:

All quarterly sampling shall be based on the calendar year and not the permit issuance date. Where two quarterly samples are specified, both samples shall be collected within the same calendar month.

3.1 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" (386-0400-001), SOPs and/or BPJ.

Outfalls 003, 005 and 006 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	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Calculation
Ammonia	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Compliance Sampling Location: at Outfalls 003, 005 and 006 (prior to mixing with any other waters)

Attachments

A. Permitttee Comments

Seneca
LANDFILL, INC.
724/625-9000
Fax: 724/625-3777
P.O. Box 1080 • Mars, Pennsylvania 16046

September 24, 2025

VIA EMAIL: aolesnanik@pa.gov & OnBase

Adam Olesnanik, P.E., Environmental Engineer Manager
Department of Environmental Protection | Clean Water Program
230 Chestnut Street
Meadville, PA 16335-3841

Re: Draft NPDES Permit | Industrial Waste
Seneca Landfill, Inc. | Application No. PA0210196
Authorization ID No. 1332484
Jackson Township | Butler County

Dear Mr. Olesnanik:

Seneca Landfill, Inc. (Seneca) has prepared the attached comment letter regarding the Draft National Pollution Discharge Elimination System (NPDES) Permit No PA0210196 issued by the Pennsylvania Department of Environmental Protection (PADEP) on August 1, 2025. The Public Notice was published in the August 16, 2025 issue of the Pennsylvania Bulletin with a 30-day comment period. Seneca requested a 15-day extension to the comment period in an email dated August 19, 2025, and the extension was granted by the PADEP in an email dated August 20, 2025. Due to this extension of the comment period, the new comment period will end September 30, 2025. Seneca Landfill also posted the Public Notice at the entrance of the landfill on August 16 and will leave the notice posted at the entrance location through September 30, 2025.

General Comments and Potential Typographical Errors:

- Draft Permit, Page 18, In Subpoint D, Sub-Subpoint (2), please review the supporting details and the lowercase letters used. Were the "*d*" and the "*e*" supposed to be "*c*" and "*d*"?
- Draft Permit, Page 28, In Subpoint D, Sub-Subpoint (2), please review the supporting details and the lowercase letters used. Were the "*l*" through "*q*" supposed to be "*a*" through "*f*"?
- Draft Permit, Part A – Effluent Limitations, Monitoring, Recordkeeping, and reporting, Page, 3. Seneca is asking for clarification on how parameters for Copper and Lead were determined for Seneca based on limits outlined in 40 CFR § 437.42.

Parameter	Concentrations (mg/l)			
	Max Monthly Average – 437.42(a)	Max Monthly Average - Seneca	Max Daily – 437.42(a)	Max Daily - Seneca
Copper	0.757	0.54	0.865	1.1
Lead	0.283	0.2	1.32	0.4

- Fact Sheet, Page 1, please add facility phone 724-625-9000.
- Fact Sheet, Page 1, 1.0 General Discussions, Sentence 8. *'is treated at the CWT facility.'* Seneca believes this is a typographical error and should be removed. Please confirm.
- Fact Sheet, Page 1, 1.0 General Discussions, Sentence 9. The hydraulic capacity should be 0.11 MGD versus 0.144 MGD.
- Fact Sheet, Page 3, 1.2 Discharge, Receiving Waters and Water Supply Information: Design Flow (MGD) is incorrectly listed at 0.144 MGD versus 0.11 MGD (see page 5 of the existing permit).
- Fact Sheet, Page 4: 2.0 Treatment Facility Summary: Design Flow (MGD) is incorrectly listed at 0.144 MGD versus 0.11 MGD (see page 5 of the existing permit).
- Fact Sheet, Page 5, 2.0 Treatment Facility Summary has the hydraulic Capacity (MGD) incorrectly as 0.144 versus 0.11 MGD (see page 5 of the existing permit).
- Fact Sheet, Page 15, 4.4.2 Anti-Degradation (93.4), Second Sentence, states, *"The facility discharge to a stream segment designated as High-Quality Waters."* However, previous designations in Section 1.2 on page 3, Section 1.3 on page 4, and Section 4.4.4 on page 15 all state that the receiving water is "*impaired*" due to "*organic enrichment and low dissolved oxygen from agriculture.*" Please provide clarification whether Connoquenessing Creek is *High-Quality Waters or Impaired.*

Summary of Significant Changes:

Based on the review of the draft permit documents, Seneca has identified several changes to the effluent limitations, monitoring, and reporting requirements as outlined below:

- Outfall 001:
  - New Parameters: The following new parameters were added to the discharge monitoring reports (DMRs): Dissolved Oxygen (Daily), Boron (1 per month), Dichlorobromomethane (1 per month), PFOA, PFOS, PFBS, and HFPO-DA (1 per quarter); and
  - Existing Parameters: The effluent limitations for Total Suspended Solids was reduced.
- Outfall 003, 005, and 006
  - New Parameters: The following new parameters were added to the DMRs for

semi-annual testing for all three outfalls: pH, COD, TSS, Total Nitrogen, Ammonia-Nitrogen, Total Phosphorus, and Total Iron.

Comments on Draft Permit Changes:

Seneca has prepared the following comments for consideration by the PADEP on the significant changes outlined above and on the DRAFT permit's new effluent limitations, monitoring, and reporting requirements.

- Seneca agrees and will accept the new parameters and testing outlined for Outfall 001 including the Dissolved Oxygen (Daily), Boron (1 per month), Dichlorobromomethane (1 per month), PFOA, PFOS, PFBS, and HFPO-DA (1 per quarter).

  Seneca agrees and will accept the new parameters and testing outlined for Outfalls 003, 005, and 006 including pH, COD, TSS, Total Nitrogen, Ammonia-Nitrogen, Total Phosphorus, and Total Iron.

- Seneca Landfill is requesting PADEP to reconsider the proposed DRAFT, lower permit effluent Average Monthly and Maximum Daily limitations for the Total Suspended Solids (TSS) parameter.

  - The **current** permit effluent Average Monthly limit is **50.2 mg/L** and the **proposed** DRAFT permit limit is **31.0 mg/L**. This is a **19.2 mg/L** or **38 percent reduction.**

  - Similarly, the **current** permit effluent Maximum Daily limit is **205 mg/L** and the **proposed** DRAFT permit limit is **60.0 mg/L**. This is a **145 mg/l** or **70.7 percent reduction.**

The new proposed DRAFT limitations would have generated 10 TSS exceedances based on the past year's analytical results.

As outlined in Section 4.3.9 on page 14 of the fact sheet there is no water quality criteria for TSS. Based on historical TSS results, the current permit effluent limitations, and the large reduction in the new effluent limitations, Seneca Landfill is requesting PADEP to reconsider higher average monthly limitations and higher daily and instantaneous maximum limitations for the final permit.

In addition, the majority of the liquids treated at the plant is landfill leachate and our discharge limitations from past permits have been based on a combination of Centralized Wastewater requirements and the Best Practicable Control Technology (BPT– 40 CFR 445.21) for landfill leachate. The daily maximum concentration under 40 CFR 445.21 was 88 mg/l and the instantaneous maximum was 110 mg/l.

- Seneca is asking for clarification on Footnote Number 3 on page 8 as outlined below:
  - (3) Exceedances of the Maximum Daily limitation for this parameter is subject to 24-hour reporting as specified in Part A III.C.4.b.(i).
  - Seneca wanted clarification on the 24-hour reporting on in-house laboratory testing since not all parameters on the DMR have this footnote. What are the procedures if the in-house daily bench testing used to adjust the plant's operation exceeds the effluent limitations for parameters with and without footnote #3?

Thank you for your consideration in this matter and if you have any questions, please contact me at 724-816-4757 or via e-mail at dsmith@senecalandfill.com.

Sincerely,

David L. Smith, P.E.
General Manager

Cc: Nick Krause, Seneca Landfill
Abbey Vogel, Seneca Landfill

B. Third Party Comment

THREE RIVERS WATERKEEPER®

PO BOX 97062
PITTSBURGH, PA 15229
THREERIVERSWATERKEEPER.ORG

DEP Northwest Regional Office (NWRO)
230 Chestnut Street, Meadville
Meadville, PA 16335

September 12, 2025

RE: Seneca Landfill Inc. application to renew an existing NPDES permit (PA0001937) to NPDES permit for an existing discharge of treated industrial waste.

To the Pennsylvania Department of Environmental Protection,

Three Rivers Waterkeeper appreciates the opportunity to comment on the renewal application for the NPDES Permit (PA0210196) at the Seneca Landfill Inc. Landfill in Jackson Township, Butler County, as released by the Department of Environmental Protection on August 16, 2025 in the PA Bulletin. Three Rivers Waterkeeper (3RWK) was founded in 2009 and aims to improve and protect the water quality of the Allegheny, Monongahela, and Ohio Rivers. These waterways are critical to the health, vitality, and economic prosperity of our region and communities. We are both a scientific and legal advocate for the community, working to ensure that our three rivers are protected and that our waters are safe to drink, fish, swim, and enjoy. We monitor and patrol our waterways, and take samples of basic parameters using our own sampling device, E.coli samples, PFAS samples and specific parameters at external laboratories. We also highlight the variety of species that live in our aquatic and riparian ecosystems. We are one of the over 300 organizations that make up the global Waterkeeper Alliance and work together to connect local communities to global environmental and advocacy resources.

We respectfully urge PA DEP to require more comprehensive and frequent monitoring for discharges associated with both stormwater and industrial waste to close critical gaps in the draft permit, and to protect Connoquenessing Creek and downstream communities.

Facility Overview and Regulatory Context:

Seneca Landfill has applied to renew its NPDES permit to discharge treated industrial wastewater and stormwater into Connoquenessing Creek. The landfill is permitted to accept municipal solid waste and "approved residual waste" under Solid Waste Permit No. 100403. A key feature of the facility is its leachate treatment plant, which is permitted as a Centralized Waste Treatment (CWT) facility for metals and organics. This facility treats leachate generated on-site and non-hazardous liquid wastes received from off-site sources, discharging effluent via Outfall 001. Stormwater runoff is managed through sedimentation basins, discharging through Outfalls 003, 005, and 006.

The facility is regulated under the Effluent Limitation Guidelines (ELGs) for CWT facilities with multiple wastestreams, as outlined in 40 CFR 437.42(a), Subpart D.[1] These requirements apply because Seneca receives and treats multiple waste streams, including landfill leachate and other off-site non-hazardous liquids. The prior NPDES permit was issued in 2016, amended in 2018 to include CWT operations, and is now up for renewal. All discharges flow to Connoquenessing Creek, which is classified for warm water fishes, aquatic life, water supply, and recreation. The nearest downstream potable water intake is the Beaver Falls Municipal Authority on the Beaver River, approximately 30 miles downstream. While dilution may reduce direct impacts, variability and insufficient monitoring at Seneca raise legitimate concerns about localized impairment and pollutant loading.

Centralized Waste Treatment Discharges – Outfall 001

The draft permit proposes quarterly TDS monitoring and semi-quarterly monitoring for metals such as antimony, arsenic, cadmium, and chromium. However, Seneca's Discharge Monitoring Reports (DMRs) reveal extreme variability in TDS concentrations, with daily maximum values spiking as high as 8,130 mg/L between 2021 and 2024. Quarterly monitoring is inadequate to characterize these swings or provide reliable data for mass loading estimates. To comply with the monitoring intent of 40 CFR 437.42(a), which requires limits and monitoring sufficient to demonstrate compliance with ELGs, DEP should increase TDS monitoring to monthly 24-hour composite samples, and require continuous conductivity monitoring with event-triggered composite samples.

The list of parameters monitored also appears narrower than the full range in the ELGs. For example, Total Kjeldahl Nitrogen (TKN) is listed only quarterly, and oil and grease are only monitored twice per month, raising the question of whether this monitoring adequately reflects Subpart D pollutant categories. DEP should require confirmation that all pollutants listed in 40 CFR 437.42(a) are addressed in the permit, and if not, expand the scope accordingly.

While the factsheet confirms Outfall 001 as the compliance point, DEP should explicitly state that monitoring must occur after treatment and before mixing with other waste streams, in line with federal requirements.

PFAS Monitoring – Process Wastewater and Stormwater

The draft requires quarterly monitoring of PFOA, PFOS, HFPO-DA, and PFBS at Outfall 001, consistent with DEP's PFAS strategy for facilities in relevant EPA categories. However, the stormwater outfalls (003, 005, 006) have no PFAS monitoring requirement. Given that landfills are well-documented PFAS sources through both leachate and stormwater runoff, PFAS should

[1] 40 CFR 437.42 -- Effluent Limitations Attainable by the Application of the Best Practicable Control Technology Currently Available (BPT)." *Ecfr.gov*, 2025, www.ecfr.gov/current/title-40/chapter-I/subchapter-N/part-437/subpart-D/section-437.42.

also be monitored in stormwater, at least quarterly for the first year, with reduced frequency only if consistent non-detects are documented.[2] Seneca Landfill's permit is inadequate to protect our waterways from PFAS contamination as the permit is only required to monitor and report on 4 of the most basic PFAS contaminants, and they are not required to test for specific PFAS typically found in landfills. DEP should also consider expanding the PFAS list beyond the four compounds currently proposed, since many comparable landfills monitor a broader suite.

Stormwater Discharges – Outfalls 003, 005, 006

The draft permit introduces monitoring for stormwater outfalls for the first time, meaning anti-backsliding does not apply. Monitoring frequencies are set at once every six months, modeled after the PAG-03 general permit. While this is a starting point, it is inadequate to capture worst-case events. DEP should require event-based ("first flush") stormwater sampling, particularly for TDS and PFAS, during high rainfall events when sedimentation basins are most likely to discharge contaminants.

Additional Clarifications Requested

- DEP should clarify the sources of the non-hazardous off-site wastes treated at the Seneca CWT facility, given potential risks from unknown or variable inputs.
- DEP should clarify what is meant by "approved residual waste" accepted by the landfill, and whether this category introduces unique risks.
- DEP should review the impairment status of Connoquenessing Creek at the discharge locations to ensure monitoring requirements adequately protect aquatic life, recreation, and water supply uses.

Conclusion

The draft permit makes progress by adding stormwater monitoring and incorporating PFAS requirements at Outfall 001. However, monitoring frequencies remain insufficient given Seneca's demonstrated variability in discharges, and the scope of parameters monitored appears incomplete relative to 40 CFR 437.42(a). To strengthen this permit and ensure adequate protection of Connoquenessing Creek:

[2] Tolaymat, T., Robey, N., Krause, M., Larson, J., Weitz, K., Parvathikar, S., Phelps, L., Linak, W., Burden, S., Speth, T., & Krug, J. (2023). A critical review of perfluoroalkyl and polyfluoroalkyl substances (PFAS) landfill disposal in the United States. *The Science of the total environment*, *905*, 167185. https://doi.org/10.1016/j.scitotenv.2023.167185

1. Require monthly TDS monitoring with conductivity triggers.

2. Expand PFAS monitoring to stormwater outfalls and additional PFAS compounds beyond the four listed.

3. Add event-based stormwater sampling for TDS and PFAS.

4. Confirm inclusion of all ELG parameters from 40 CFR 437.42(a).

5. Clarify treatment sources and residual waste definitions.

Strengthening Seneca Landfill Inc.'s monitoring program is not only consistent with the federal CWT effluent guidelines but also essential given the scientific evidence that landfills are significant and under-regulated sources of PFAS and other contaminants. The proposed permit renewal offers DEP a critical opportunity to ensure that monitoring is sufficiently frequent, comprehensive, and protective to safeguard Connoquenessing Creek, its designated uses, and downstream communities.

Thank you for your time and consideration.

Sincerely,

Heather Hulton VanTassel, PhD
Executive Director, Three Rivers Waterkeeper
Heather@threeriverswaterkeeper.org