

Application Type Renewal
Facility Type Industrial
Major / Minor Minor

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

Application No. PA0220906
APS ID 970480
Authorization ID 1232916

Applicant and Facility Information

Applicant Name	<u>Pithole Water Association</u>	Facility Name	<u>Pithole Water Association</u>
Applicant Address	<u>P.O. Box 25</u> <u>Cyclone, PA 16726-0025</u>	Facility Address	<u>Pithole Road</u> <u>Cyclone, PA 16726</u>
Applicant Contact	<u>James Wilcox</u>	Facility Contact	<u></u>
Applicant Phone	<u>(814) 465-7700</u>	Facility Phone	<u>(814) 598-9168</u>
Client ID	<u>64067</u>	Site ID	<u>239925</u>
SIC Code	<u>4941</u>	Municipality	<u>Keating Township</u>
SIC Description	<u>Trans. & Utilities - Water Supply</u>	County	<u>McKean</u>
Date Application Received	<u>June 3, 2018</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>September 4, 2018</u>	If No, Reason	<u></u>
Purpose of Application	<u>Renewal of a NPDES Permit for an existing discharge of treated industrial waste.</u>		

Summary of Review

The current NPDES Permit has a condition in Part C that required the permittee to cease their stream discharge and connect into the public sewerage system prior to the expiration date of this permit due to chronic effluent violations it was having at the time of the previous permit renewal. The current permit expired November 30, 2018 and is considered administratively extended allowing them to still discharge. The permittee stated during a September 26, 2018, site inspection that the facility did not have the electrical capacity to support a grinder and feed pump required to convey wastewater to the Keating Township Cyclone STP and that the STP is reluctant to accept the filter backwash wastewater due to potential inability to treat the additional high levels of iron and manganese it contains.

There had also been discussions between Keating Township and the Bradford Water Authority about extending Bradford's distribution system to service the Cyclone Area, thus replacing this facility. The Department contacted the Water Authority, and they indicated that this option was explored but it has proven to be too costly of a project to pursue at this time.

In consideration of the current connection and compliance status, the Department is proposing to renew the NPDES Permit for a 5-year term and the issue will be re-evaluated at the time of the next permit renewal.

There are currently no open violations listed in EFACTS for this permittee (8/09/2019).

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.

Approve	Deny	Signatures	Date
X		Adam J. Pesek, E.I.T. / Environmental Engineering Specialist	
X		Justin C. Dickey, P.E. / Environmental Engineer Manager	

Compliance History

The facility still uses paper DMRs for reporting. A review of the paper DMRs indicates they have been meeting the limits.

The permittee will be required to sign up for and use the eDMR system for reporting in the renewed permit.

Last onsite inspection occurred on 9/26/2019.

Development of Effluent Limitations

Outfall No. 001 Design Flow (MGD) 0.0006
 Latitude 41° 50' 7" Longitude 78° 34' 8"
 Wastewater Description: Treated filter backwash

Technology-Based Limitations

The following technology-based limitations apply, subject to water quality analysis and BPJ where applicable:

Parameter	Limit (mg/l)	SBC	Federal Regulation	State Regulation
Total Suspended Solids	30	Average Monthly		362-2183-003
Total Suspended Solids	40	Daily Maximum		362-2183-003
Aluminum	4.0	Average Monthly		362-2183-003
Aluminum	8.0	Daily Maximum		362-2183-003
Manganese	1.0	Average Monthly		362-2183-003
Manganese	2.0	Daily Maximum		362-2183-003
Total Iron	2.0	Average Monthly		362-2183-003
Total Iron	4.0	Daily Maximum		362-2183-003
Total Residual Chlorine	0.5	Average Monthly	-	92a.48(b)(2)
Total Residual Chlorine	1.0	Daily Maximum		362-2183-003
pH	6.0 – 9.0 S.U.	Min – Max	133.102(c)	95.2(1)

Comments: 362-2183-003 References the Department’s technical guidance document entitled “Technology-based Control Requirements for Water Treatment Plant Wastes.” The limits are BPT (Best Practical Control Technology) and are not based on actual regulation.

The TRC daily maximum limit was omitted from the current permit. It will be placed in this draft renewed permit.

Water Quality-Based Limitations

The following limitations were determined through water quality modeling (output files attached):

Parameter	Limit (mg/l)	SBC	Model
Aluminum, Total	1.5	Average Monthly	PENTOXSD Ver. 2.0d
Aluminum, Total	3.0	Daily Maximum	PENTOXSD Ver. 2.0d

Comments: Water quality modeling was not conducted for Total Residual Chlorine (TRC) at the first point of perennial conditions because the distance between the outfall and the first point of perennial conditions is approximately 6,000 feet (1.1 miles) and any chlorine residual left in the effluent, if it reaches that perennial point, would be expected to have evaporated or been consumed by exposure to organic ground material.

Based on a review of past DMRs, the permittee should be able to easily meet the new aluminum limit with the current treatment in place.

Best Professional Judgment (BPJ) Limitations

Comments: N/A

Anti-Backsliding

N/A

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	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	2/month	Measured
pH (S.U.)	XXX	XXX	6.0 Daily Min	XXX	9.0	XXX	2/month	Grab
TRC	XXX	XXX	XXX	0.5	1.0	1.2	2/month	Grab
TSS	XXX	XXX	XXX	30.0	60.0	75	2/month	Grab
Total Aluminum	XXX	XXX	XXX	1.5	3.0	3.7	2/month	Grab
Total Iron	XXX	XXX	XXX	2.0	4.0	5	2/month	Grab
Total Manganese	XXX	XXX	XXX	1.0	2.0	2.5	2/month	Grab

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

Other Comments: