

Application Type Renewal
 Facility Type Non-Municipal
 Major / Minor Major

**NPDES PERMIT FACT SHEET
ADDENDUM**

Application No. PA0228061
 APS ID 1020754
 Authorization ID 1322096

Applicant and Facility Information

Applicant Name	<u>Aqua PA Wastewater, Inc.</u>	Facility Name	<u>Treasure Lake Resort</u>
Applicant Address	<u>762 West Lancaster Avenue</u> <u>Bryn Mawr, PA 19010</u>	Facility Address	<u>Township Road 854</u> <u>Dubois, PA 15801-9035</u>
Applicant Contact	<u>Zach Martin</u>	Facility Contact	<u>Zach Martin</u>
Applicant Phone	<u>(724) 347-7418</u>	Facility Phone	<u>(724) 347-7418</u>
Client ID	<u>62614</u>	Site ID	<u>464465</u>
SIC Code	<u>4952</u>	Municipality	<u>Sandy Township</u>
SIC Description	<u>Trans. & Utilities - Sewerage Systems</u>	County	<u>Clearfield</u>
Date Published in PA Bulletin	<u>February 5, 2022</u>	EPA Waived?	<u>No</u>
Comment Period End Date	<u>March 7, 2022</u>	If No, Reason	<u>Major Facility</u>
Purpose of Application	<u>Application for a renewal of an NPDES permit for discharge of treated Sewage</u>		

Summary of Review

The subject permit was drafted on January 19, 2022

Comments were received from EPA Region III by a February 6, 2022 email from Jennifer Fulton. The Department's responses are provided below in the order given.

1. The first comment regarded WET toxicity and monitoring/limitations.

Additional WETT results provided for the permittee for Q1 2022 provide four successive passing quarters of WET tests and therefore, no limitations will be required in the permit at this time. An updated WET spreadsheet is attached to this Fact Sheet Addendum including the four most recent tests. In addition, as a result of this data the Department approved the permittee's WET TRE on March 11, 2022.

2. The second comment regarded the facility's status as a privately owned treatment works and potential discharges to the facility by industrial users.

The permittee has certified with the application that there are no industrial users to the plant and that the facility does not receive any hauled in wastes. Should new sources be introduced in the future they should be addressed under the planned changes to waste stream requirements in Part A of the permit.

The Department received a March 22, 2022 letter from Mark Widdersheim of ENTECH Engineering providing comments on behalf of Aqua Pennsylvania Wastewater, Inc (Aqua). The Department's responses are provided below in the order given.

Approve	Deny	Signatures	Date
✓		<i>Keith C. Allison</i> Keith C. Allison / Project Manager	March 17, 2022
✓		<i>Nicholas W. Hartranft</i> Nicholas W. Hartranft, P.E. / Environmental Engineer Manager	March 18, 2022

Summary of Review

1. Facility Name

Because the Facility Name listed on the permit is the whole Treasure Lake Resort Site which also has permits for other Department programs the name will remain as Treasure Lake Resort.

2. Aqua PA Address

The address listed on the permit for Aqua will be changed to 762 West Lancaster Avenue, Bryn Mawr, PA 19010 as requested.

3. Receiving Stream

The Department will correct the listed receiving stream from Sandy Lick Creek (TSF) to Narrows Creek (CWF) as noted.

4. Total Silver

Because Aqua conducted an additional sampling event for Total Silver that was not detectable at a detection level of 0.0003 mg/L meeting the Target Quantitation Limit of 0.0004 mg/L monitoring for Total Silver will be removed from the permit.

5. Total Aluminum

Because available monitoring has shown the Total Aluminum levels in the effluent to be less than the WQBEL the Department will return the Total Aluminum monitoring from Quarterly to Annual as requested.

6. Hexavalent Chromium

While the 0.06 mg/L sample may appear to be an outlier from the other available data noted, the result was above the WQBEL and warrants additional monitoring and the monthly monitoring and limitations will remain in the permit.

7. TRC

Because the permittee continues to use sodium hypochlorite for routine maintenance TRC limitation and monitoring will be included in the permit again as requested. Modeling is attached showing the existing permit limitations are adequate.

8. WET Testing

On March 11, 2022 the Department approved Aqua PA Wastewater's WET TRE Final Report based on more recent testing. At this point annual WET testing is appropriate. The Department cannot, at this time approve the Pathogen test protocol.

9. Fact Sheet Corrections

The errors noted in the Fact Sheet regarding the chronic WET testing and the dilution series used are noted.

Based on the above comments and due to the proposed changes noted above including the introduction of TRC monitoring it is recommended that NPDES Permit No. PA0228061 be redrafted

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*,

Summary of Review

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.

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	Instantaneous Minimum	Average Monthly	Weekly Average	Instant. Maximum		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	Continuous	Metered
pH (S.U.)	XXX	XXX	6.0	XXX	XXX	9.0	1/day	Grab
DO	XXX	XXX	6.0	XXX	XXX	XXX	1/day	Grab
TRC	XXX	XXX	XXX	0.05	XXX	0.17	1/day	Grab
CBOD5 Nov 1 - Apr 30	200	300	XXX	24.0	36.0	48	2/week	24-Hr Composite
CBOD5 May 1 - Oct 31	100	150	XXX	12.0	18.0	24	2/week	24-Hr Composite
TSS	250	375	XXX	30.0	45.0	60	2/week	24-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
E. Coli (No./100 ml)	XXX	XXX	XXX	XXX	XXX	Report	1/month	Grab
UV Transmittance (%)	XXX	XXX	Report	XXX	XXX	XXX	1/day	Metered
Total Nitrogen	Report Avg Qrtly	Report Daily Max	XXX	Report Avg Qrtly	Report Daily Max	XXX	1/quarter	24-Hr Composite
Ammonia Nov 1 - Apr 30	37	56	XXX	4.5	6.0	9	2/week	24-Hr Composite
Ammonia May 1 - Oct 31	12	18	XXX	1.5	2.0	3	2/week	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	Weekly Average	Instantaneous Minimum	Average Monthly	Weekly Average	Instant. Maximum		
Total Phosphorus	Report Avg Qrtly	Report Daily Max	XXX	Report Avg Qrtly	Report Daily Max	XXX	1/quarter	24-Hr Composite
Total Aluminum (ug/L)	XXX	Report Daily Max	XXX	XXX	Report Daily Max	XXX	1/year	24-Hr Composite
Hexavalent Chromium (ug/L)	0.11	0.18 Daily Max	XXX	13.5	21.0 Daily Max	33.9	1/month	24-Hr Composite
Total Copper (ug/L)	0.15	0.23 Daily Max	XXX	17.8	27.7 Daily Max	44.4	1/month	24-Hr Composite
Free Cyanide (ug/L)	0.043	0.067 Daily Max	XXX	5.18	8.08 Daily Max	12.9	1/month	24-Hr Composite
Total Zinc (ug/L)	XXX	Report Daily Max	XXX	XXX	Report Daily Max	XXX	1/quarter	24-Hr Composite

Compliance Sampling Location: Outfall 001

Other Comments: Changes from the previous draft include removal of Total Silver monitoring, inclusion of TRC limitations and monitoring, and change in Total Aluminum monitoring from quarterly to monthly as all noted above.

