pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHCENTRAL REGIONAL OFFICE
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0232602**
Facility Type	**Industrial**	APS ID	**983809**
Major / Minor	**Major**	Authorization ID	**1256955**

NPDES PERMIT FACT SHEET ADDENDUM No. 1

Applicant and Facility Information

Applicant Name	**Panda Hummel Station LLC**	Facility Name	**Panda Hummel Station LLC**
Applicant Address	PO Box 518 2386 N Old Trail	Facility Address	PO Box 518 2386 N Old Trail
	Shamokin Dam, PA 17876		Shamokin Dam, PA 17876
Applicant Contact	Michael Stahr	Facility Contact	Michael Stahr
Applicant Phone	(423) 912-4777	Facility Phone	(423) 912-4777
Client ID	314638	Site ID	786918
SIC Code	4911	Municipality	Shamokin Dam Borough
SIC Description	Trans. & Utilities - Electric Services	County	Snyder
Date Published in PA Bulletin	June 22, 2019	EPA Waived?	No
Comment Period End Date	July 21, 2019	If No, Reason	Major Facility

Purpose of Application: Application for a renewal of an NPDES permit for discharge of treated industrial waste.

Internal Review and Recommendations

Comments/Responses

The permittee submitted comments dated July 18, 2019. A summary of the comments and DEP responses are as follows:

1. **Comment:** Hummel Station LLC ("Hummel") requests that DEP revise the discharge flow rate, and corresponding mass discharge limits, in the draft permit to reflect the design value of 1.553 MGD.

   Response: The discharge was remodeled at the design flow of 1.553 MGD. The updated PENTOXSD model recommends a slightly more stringent total aluminum water quality-based concentration effluent limit. Additionally, mass limits have been recalculated using a design flow of 1.553 MGD.

2. **Comment:** Hummel requests that DEP delete sample requirements applicable to acrolein, acrylamide, and vinyl chloride from the draft permit.

   Response: Based on the updated non-detect sample results, DEP has removed acrolein, acrylamide, and vinyl chloride requirements from the draft permit.

3. **Comment:** The discharge limit for aluminum is unnecessary and inappropriate for inclusion in the permit, and Hummel therefore requests that DEP remove the proposed discharge limitation for aluminum from the draft permit. If DEP insists on including any discharge limitation for aluminum within the draft permit, the limit should be adjusted to reflect the water quality-based effluent limitation of 3.015 mg/l.

Approve	Return	Deny	Signatures	Date
			Derek S. Garner / Project Manager	
			Nicholas W. Hartranft, P.E. / Environmental Engineer Manager	
			Thomas M. Randis / Program Manager	

Internal Review and Recommendations

Response: DEP generally relies on maximum concentrations reported in the application when developing water quality-based effluent limits, not the average concentration which is cited in the comment. Additionally, due to sampling accuracy and for consistency, DEP generally rounds metal concentrations with a general magnitude between 1.0 and 10.0 down to the nearest hundredth. It does not appear that there is a unique reason applicable to this discharge to deviate from these standard operating procedures. The limit has been revised due to the increase in design flow and is now 2.29 mg/l average monthly.

4. **Comment:** The proposed total suspended solids ("TSS") limits in the draft permit are inappropriate and are not supported by a change in an applicable regulatory standard or operational condition related to the facility. If DEP insists on including on the proposed TSS limits, then Hummel will require a two-year compliance schedule (1 year for engineering and 1 year for construction) to comply.

   Response: DEP believes exercising best professional judgment to establish TSS limits based on low-volume waste effluent limit guidelines is appropriate for reasons justified in the original fact sheet. So that Hummel is not immediately in noncompliance with the new TSS limits, DEP has proposed a two-year compliance schedule in Part C.V of the permit. The schedule allows for one year for engineering/design of the treatment unit and one year for subsequent construction.

5. **Comment:** Effluent limitations requiring instantaneous maximum statistical base codes cannot require a 24-hr composite sample type.

   Response: Hummel is not required to report instantaneous maximum concentrations on the discharge monitoring reports. Instantaneous maximum concentrations are generally used for grab samples taken at the time of a DEP inspection.

6. **Comment:** All stormwater discharges on site are managed by the property owner under a separate NPDES permit; PA008451. Accordingly, Hummel requests that the proposed stormwater requirements in Part C.III of the permit are removed.

   Response: Although the stormwater outfalls are covered under a separate NPDES permit, it is still appropriate to require Hummel to maintain a PPC Plan and stormwater best management practices.

The U.S. EPA submitted comments dated June 21, 2019. The comments and DEP's response is as follows:

1. **Comment:** The current permit included water quality-based effluent limits (WQBELS) for total copper and monitoring for total arsenic, total cadmium, and total thallium. The draft permit does not include WQBELs for these pollutants. The fact sheet does not clearly explain how the anti-backsliding requirements are met. The permit writer determines the calculated limitations that will ensure that all applicable CWA standards are met. As noted above, for reissued permits, if any of the limitations are less stringent than limitations on the same pollutant in the previous NPDES permit, the permit writer then conducts an anti-backsliding analysis and, if necessary, revises the limitations accordingly. A detailed discussion of the anti-backsliding provisions of the CWA and the NPDES regulations shall be added to the fact sheet.

   Response: DEP believes anti-backsliding was appropriately addressed on p. 6 of the fact sheet.

Summary of Changes

To summarize, based on the above comments DEP has proposed the following changes to the draft permit:

1. A revised total aluminum water quality-based effluent limit based on the revised discharge design flow of 1.553 MGD.
2. Mass limitations have been adjusted to reflect the revised discharge design flow of 1.553 MGD.
3. Based on more sensitive sample results, acrolein, acrylamide, and vinyl chloride requirements have been removed from the permit.

Internal Review and Recommendations

4. A two-year compliance schedule has been included in Part C of the permit to allow time for the permittee to engineer/design and construct additional treatment to comply with the proposed TSS limits.

Recommendation

Based on these changes, it is recommended that the permit is redrafted and published in the PA Bulletin for an additional thirty-day comment period.