Message

From: Price-Fay, Michelle [Price-Fay.Michelle@epa.gov]
Sent: 4/9/2020 10:09:08 PM
To: sefurjanic@pa.gov; Patel, Pravin [prpatel@pa.gov]; Thaker, Ketan [kthaker@pa.gov]
CC: Martinsen, Jessica [Martinsen.Jessica@epa.gov]; Hales, Dana [Hales.Dana@epa.gov]
Subject: RE: [External] PA0026450 Bristol Township STP

At this time, it is for this discharger only.

Michelle Price-Fay, Chief
Clean Water Branch
Water Division (3WD40)
U.S. EPA Region III
1650 Arch Street
Philadelphia, Pa 19103
215-814-3397

From: Furjanic, Sean <sefurjanic@pa.gov>
Sent: Thursday, April 09, 2020 8:37 AM
To: Patel, Pravin <prpatel@pa.gov>; Price-Fay, Michelle <Price-Fay.Michelle@epa.gov>; Thaker, Ketan <kthaker@pa.gov>
Cc: Martinsen, Jessica <Martinsen.Jessica@epa.gov>; Hales, Dana <Hales.Dana@epa.gov>
Subject: RE: [External] PA0026450 Bristol Township STP

Over the years EPA has requested customized pretreatment language in permits for certain dischargers, so I'd need to know whether they're recommending a global change in the language or if it was for this discharger only.

From: Patel, Pravin <prpatel@pa.gov>
Sent: Thursday, April 9, 2020 8:31 AM
To: Price-Fay, Michelle <Price-Fay.Michelle@epa.gov>; Thaker, Ketan <kthaker@pa.gov>
Cc: Martinsen, Jessica <martinsen.jessica@epa.gov>; Hales, Dana <Hales.Dana@epa.gov>; Sanchez Gonzalez, Natalie <sanchez-gonzalez.natalie@epa.gov>; Shuart, Ryan <shuart.ryan@epa.gov>; Turner, Andre <Turner.Andre@epa.gov>; Green, Margaret <green.margaret@epa.gov>; Furjanic, Sean <sefurjanic@pa.gov>; Trakis, Lisa <Trakis.Lisa@epa.gov>; Pratt, Stacie <Pratt.Stacie@epa.gov>; Camperson, Joseph <Camperson.Joseph@epa.gov>; Magge, Thomas L <tmagge@pa.gov>
Subject: RE: [External] PA0026450 Bristol Township STP

Thanks for timely review during this unusual time.

We will coordinate EPA proposed suggested revision of pre-treatment language with our CO to see it can be applied to statewide for consistency and revise our condition accordingly.

Thanks

Pravin C. Patel, P.E | Environmental Engineer Manager
Department of Environmental Protection
2 East Main Street | Norristown, PA 19401
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From: Price-Fay, Michelle <Price-Fay.Michelle@epa.gov>
Sent: Thursday, April 9, 2020 7:53 AM
To: Thaker, Ketan <kthaker@pa.gov>
Cc: Patel, Pravin <prpatel@pa.gov>; Martinsen, Jessica <martinsen.jessica@epa.gov>; Hales, Dana <Hales.Dana@epa.gov>; Sanchez Gonzalez, Natalie <sanchez-gonzalez.natalie@epa.gov>; Shuart, Ryan <shuart.ryan@epa.gov>; Turner, Andre <Turner.Andre@epa.gov>; Green, Margaret <green.margaret@epa.gov>; Furjanic, Sean <sefurjanic@pa.gov>; Trakis, Lisa <Trakis.Lisa@epa.gov>; Pratt, Stacie <Pratt.Stacie@epa.gov>; Camperson, Joseph <Camperson.Joseph@epa.gov>
Subject: [External] PA0026450 Bristol Township STP

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Good Morning Ketan,

According to our Memorandum of Agreement, the Environmental Protection Agency (EPA) Region III has received the draft National Pollutant Discharge Elimination System (NPDES) permit for:

Permittee/Facility name: Bristol Township STP
NPDES Number: PA0026450
EPA Received: 3/11/2020
30-day response due date: 4/10/2020

This is a major permit that discharges to the Delaware River and is affected by Delaware River Estuary PCB TMDLs; this facility has been identified as a zone 2 discharger. EPA has chosen to perform a limited review of the draft permit based on the wasteload allocation (WLA) requirements of the approved Delaware River Estuary PCB TMDL, WET, and Pretreatment requirements. EPA has completed its review and offers the following comment(s):

1.) Please make the following modifications to the POTW Pretreatment Program Implementation Language in Part C.II of the permit:

1a.) At the bottom of page 27, in part C.II.A of the permit, please add the language which is red bolded:

"I. POTW PRETREATMENT PROGRAM IMPLEMENTATION

A. General Requirement – The permittee shall operate and implement a POTW pretreatment program in accordance with the federal Clean Water Act, the Pennsylvania Clean Streams Law, the federal General Pretreatment Regulations at 40 CFR Part 403, **and with the legal authorities, policies, procedures, and financial provisions of the approved Pretreatment program submitted by the Permittee.** The program shall be implemented in accordance with the permittee's approved pretreatment program and any modifications thereto submitted by the permittee and approved by the Approval Authority.

a. The Permittee shall provide sufficient resources, adequate staff, equipment, support capabilities and qualified personnel to implement its Pretreatment program in

accordance with 40 CFR 403.8(f)(3) in order to carry out all elements of the pretreatment program."

1b.) In Part C.II.E, titled "Headworks Analysis" (Page 29), Please revise the first couple of sentences as follows:

> "E. Headworks Analysis – **The Permittee shall develop, continually maintain, and enforce, as necessary, local limits to implement the general and specific prohibitions in 40 CFR§403.5(c)(1).** The permittee shall submit to EPA a reevaluation of its local limits based on a headworks analysis of its treatment plant within one (1) year of permit issuance, and provide a revised submission within three (3) months of receipt of comments from EPA or DEP unless a longer period of time is granted in writing by EPA or DEP."

Please address the above and provide us with any changes to the draft permit and/or fact sheet, if necessary. Please contact Natalie Sanchez on my staff via telephone at 215-814-2078 or via electronic mail at sanchez-gonzalez.natalie@epa.gov.

Hope that all is well. Stay safe and healthy,
Sincerely,
Michelle

Michelle Price-Fay, Chief
Clean Water Branch
Water Division (3WD40)
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1650 Arch Street
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215-814-3397