



GENERAL PERMIT PAG-02 FOR COVERAGE UNDER GENERAL NPDES PERMIT FOR STORMWATER DISCHARGES ASSOCIATED WITH CONSTRUCTION ACTIVITIES

FACT SHEET

EXECUTIVE SUMMARY

Federal regulations require certain earth disturbance activities that will result in stormwater discharges from construction activities to obtain coverage under a National Pollutant Discharge Elimination System (NPDES) Permit. In compliance with the provisions of the Clean Water Act, 33 U.S.C. Section 1251 *et seq.* ("the Act") and Pennsylvania's Clean Streams Law, as amended, 35 P.S. Section 691.1 *et seq.*, the Department of Environmental Protection provides a general permit coverage to discharge stormwater surface water(s) from a site from one (1) acre to five (5) acres of earth disturbance with a point source discharge; or five (5) or more acres of earth disturbance. These are subject to the Department's enclosed PAG-02 which incorporates all effluent limitations, monitoring and reporting requirements, and other terms, conditions, criteria and special requirements for the discharge of stormwater from point sources composed entirely of stormwater associated, in whole or in part, with construction activity, as defined in this general permit, to surface waters of this Commonwealth, including through municipal separate storm sewers and non-municipal separate storm sewer. Authorization to discharge is subject to the implementation of the plans and additional associated information submitted as part of the Notice of Intent.

General Permit PAG-02 provides a streamlined process to meet the federal requirements. In some cases, such as where an applicant is not eligible for general permit coverage because it discharges to a "Special Protection" watershed, an individual permit is needed.

LEGAL AUTHORITY FOR GENERAL PERMIT

DEP's regulations at Title 25 Pa. Code §§92.81 - 92.83 provide for the issuance of a General Permit. A General Permit is allowed when:

- A. The same, or substantially similar, types of operations are involved;
- B. The same types of wastes are being discharged;
- C. The same effluent limitations and/or operating conditions are required;
- D. The same or similar monitoring is required;
- E. The discharge does not contain toxic or hazardous pollutants or any other substance which, because of its quantity, concentration, or physical, chemical or infectious characteristics - may cause or contribute to an increase in mortality or morbidity in either an individual or the total population, or pose a substantial present or future hazard to human health or the environment when discharged into navigable waters;
- F. In the opinion of DEP, the discharges are more appropriately controlled under the General Permit than under individual permits;
- G. Individually and cumulatively, the discharges do not have the potential to cause significant adverse environmental impact; and
- H. The discharge is not to HQ or EV waters as defined by Title 25 Pa. Code Chapter 93.

LENGTH OF THE PERMIT

The Department of Environmental Protection (Department) is reissuing the National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction Activities (PAG-02, 2009 amendment) for two years from the effective date of December 7, 2009. The Environmental Protection Agency (EPA) has recommended that this PAG-02 renewal be of a shorter duration due to the November 23, 2009 issuance of the final rule for "Effluent Limitations Guidelines and Standards for the Construction and Development Industry, and in anticipation of the finalization of revisions to Pennsylvania's Chapter 102, Erosion and Sediment Control and Stormwater Management proposed August 29, 2009 (39 Pa. B. 5131). The Department agrees and is publishing this renewal for two years rather than five. The PAG-02, 2009 amendment will expire on December 7, 2011. The general permit will expire 2 years from the date of its issuance. The department will publish a notice in the *Pennsylvania Bulletin* of the draft, renewed, or reissued general permit or of any amendments to this general permit, and after a comment period notice of the final, renewed, reissued or amended general permit will be published in the *Pennsylvania Bulletin*. Any person with an unexpired approval of coverage under the general permit shall be responsible for complying with the final renewed, reissued or amended general permit. Such persons shall be covered by the general permit even if the discharger has not submitted a separate NOI to be covered by such final renewed, reissued or amended general permit. Such person may request coverage under an individual permit. See 40C.F.R. § 122.28(b)(2)(vi); 25 Pa. Code § 92.81(c) and (d).

FEE INCREASE

The Department is increasing the permit application fee from \$250 to \$500, payable to the "Clean Water Fund." This \$500 fee will apply to all new and all renewal notice of intent applications.

WHO CAN USE GENERAL PERMIT PAG-02?

This permit applies to persons proposing certain earth disturbance activities that disturb five (5) or more acres, or an earth disturbance on any portion, part, or during any stage of, a larger common plan of development or sale that involves five (5) or more acres of earth disturbance, AND, earth disturbance activities with a point source discharge to surface waters of this Commonwealth that disturb from one (1) to less than five (5) acres, or an earth disturbance on any portion, part, or during any stage of, including earth disturbance activities of less than one acre, that are part of a larger common plan of development or sale that involves one (1) to less than five (5) acres of disturbance with a point source discharge to surface waters of this Commonwealth. This permit does not apply to persons proposing earth disturbance activities associated with agricultural plowing and tilling, timber harvesting activities, road maintenance activities, and oil and gas exploration, production, processing or treatment operations or transmission facilities. Earth disturbance activities associated with oil and gas distribution facilities are covered under this permit.

Earth disturbance activities associated with oil and gas exploration, production, processing or treatment operations or transmission facilities may be required to obtain coverage under the Pennsylvania Clean Streams Law general permit "Erosion and Sediment Control General Permit (ESCGP-1) for Earth Disturbance Activities Associated with Oil and Gas Exploration, Production, Processing or Treatment Operations and Transmission Facilities."

PAG-02 requires the use of Best Management Practices (BMPs) to minimize accelerated erosion and sedimentation and to manage changes in post construction stormwater runoff rate, volume and quality to protect, maintain, reclaim and restore waters of this commonwealth and to achieve the requirements of the Clean Water Act, 33 U.S.C. Section 1251 *et seq.*, the Pennsylvania Clean Streams Law, 35 P.S. Section 691.1 *et seq.*, and 25 Pa. Code Chapters 93, 96 and 102.

What activities are Not eligible to use the permit?

The following activities are not eligible for coverage under this permit:

- (1) Discharges to waters with a designated or existing use of High Quality or Exceptional Value pursuant to 25 Pa. Code Chapter 93;
- (2) Discharges which contain hazardous pollutants, toxics, or any other substance which - because of its quantity, concentration, or physical, chemical, or infectious characteristics - may cause or contribute to an increase in mortality or morbidity in either an individual or the total population, or pose a substantial present or future hazard to human health or the environment when discharged into surface waters of this commonwealth;

- (3) Discharges which individually or cumulatively have the potential to cause significant adverse environmental impact;
- (4) Discharges to waters for which NPDES general permit coverage are prohibited under 25 Pa. Code Chapter 92;
- (5) Discharges which are not, or will not be, in compliance with any of the terms or conditions of this general permit;
- (6) Discharges from a person who has failed and continues to fail to comply or has shown a lack of ability or intention to comply with a regulation, permit, and schedule of compliance or order issued by the department;
- (7) Discharges subject to categorical point source effluent limitations promulgated by EPA;
- (8) Discharges which do not, or will not, result in compliance with applicable effluent limitations or water quality standards;
- (9) Discharges from construction activities for which the department requires an Individual NPDES permit to ensure compliance with the Clean Water Act, the Clean Streams Law, or rules and regulations promulgated thereto; or where a change has occurred in the availability of demonstrated technology or practices for the control or abatement of pollutants applicable to the point source;
- (10) Discharges associated with coal mining or noncoal mining activities pursuant to the department's regulations at 25 Pa. Code Chapters 77 and 86-90;
- (11) Discharges associated with a construction activity that may adversely affect a Pennsylvania or federal endangered or threatened species or its critical habitat;
- (12) Discharges from a site where other point source(s) require the issuance of an Individual NPDES permit; and
- (13) Discharges to surface waters identified as impaired waters where the proposed discharge will result in a net change (pre-condition to post condition) in volume or rate or water quality of the stormwater.
- (14) Persons are not eligible for coverage under this permit for discharges of pollutants of concern to waters for which there is a total maximum daily load (TMDL) established or approved by EPA unless the E&S and PCSM Plans include implementation measures or controls that are consistent with the assumptions and requirements of such TMDL. To be eligible for coverage under this general permit, persons must implement conditions applicable to their discharges necessary for consistency with the assumptions and requirements of such TMDL. If a specific wasteload allocation has been established that would apply to the discharge, persons must implement necessary steps to meet that allocation. *Any questions on how to comply with a TMDL should be directed to the appropriate DEP regional office.*

PUBLIC NOTICE OF GENERAL PERMIT AND PUBLIC HEARING

Public notice of the proposed renewal of PAG-02 was published in the *Pennsylvania Bulletin* at 39PaB. 4555 (August 15, 2009).

There was a 30-day comment period during which interested persons had an opportunity to submit written comments or petition for a public meeting. All written comments received during the 30-day comment period as well as comments from the United States Environmental Protection Agency, Region III, were considered in the formulation of the final permit. There were 9 commentators in addition to EPA. DEP reviewed and prepared a Comment and Response document which has been published on the DEP Web site in the final package for this General Permit.

The final permit was published as final in the *Pennsylvania Bulletin* at 39 PaB. XXXX (December 5, 2009).

NOTICE OF INTENT (NOI) FOR COVERAGE UNDER THE GENERAL PERMIT AND ADMINISTRATION OF THE PERMIT

Any eligible discharger who wishes to be covered by PAG-02 must file an NOI for coverage with DEP or the delegated County Conservation District. If the NOI is accepted, DEP will formally notify the discharger of the

coverage by transmitting a copy of the General Permit bearing an individual identification number. Notice of each NOI approval will be published by DEP in the *Pennsylvania Bulletin*. The applicant also has the obligation under §510-5 of the Administrative Code (71 P.S. §510-5) to give written notice to the municipality in which the facility is located.

WHAT ARE THE PERMIT REQUIREMENTS?

(1) Persons proposing to discharge stormwater associated with construction activities of either one to less than five acres of earth disturbance with a point source **or** five or more acres of earth disturbance must apply for an NPDES permit. Also eligible persons proposing to expand the scope of previously authorized construction activity which discharges stormwater must apply for a permit. Persons who wish to be covered by this general permit, must submit an administratively complete and acceptable Notice of Intent (NOI) to the Department or authorized Conservation District and receive authorization from the Department or authorized Conservation District prior to commencing the construction activity. The NOI shall be filed in accordance with the detailed instructions specified in the NOI instruction package.

(2) Operators of all construction activities shall develop, implement, and maintain erosion and sediment (E&S) and Post Construction Stormwater Management (PCSM) BMPs and other pollution prevention measures required by this permit to minimize accelerated erosion and sedimentation before, during, and after construction activities.

(3) E&S control BMPs shall be designed and implemented to meet the standards and specifications identified in the Department's E&S Pollution Control Manual, No. 363 2134 008, as amended and updated, or an approved alternative, when legally authorized.

(4) PCSM BMPs shall be designed and implemented to meet the standards and specifications identified in the Department's Stormwater Best Management Practices Manual, No. 363-0300-002, as amended and updates, or approved alternative, when legally authorized.

(5) The E&S Plan, PCSM Plan, and Preparedness, Prevention and Contingency (PPC) Plan shall identify appropriate BMPs that will be implemented to ensure that existing and designated uses of surface water are protected and maintained. The E&S Plan must be reviewed and approved by DEP or the delegated entity prior to commencing the construction activity.

(6) The permittee or co permittee shall develop and implement the E&S Plan, PPC Plan, PCSM Plan, and have all of the plans and other documents required by this permit maintained at the site and available for review by the Department, Conservation District or other authorized local, state, or federal agent or representative.

SUMMARY OF THE PERMIT REVISIONS

Coverage of Permit - The Environmental Protection Agency (EPA) has recommended that this PAG-02 renewal be of a shorter duration due to the November 23, 2009 issuance of the final rule for "Effluent Limitations Guidelines and Standards for the Construction and Development Industry, and in anticipation of the finalization of revisions to Pennsylvania's Chapter 102, Erosion and Sediment Control and Stormwater Management proposed August 29, 2009 (39 Pa. B. 5131). The Department agrees and is publishing this renewal for two years rather than five. The PAG-02, 2009 amendment will expire on December 7, 2011. The approval to discharge in accordance with the terms and conditions will be valid for a period of two years from the date of the approval of coverage issued to a permittee.

Definitions – The definition section was moved from part B # 3 in the existing permit (PAG-02, 2002 amendment) to the front of the PAG-02, 2009 amendment. New definitions added include accelerated erosion; clean fill; distribution facilities; earth disturbance activities; effluent limitation or standard; erosion; NOT – notice of termination; surface waters; transferee; and Waters of this Commonwealth. The following definitions were deleted, Preparedness, Prevention and Contingency Plan (PPC Plan); stormwater associated with construction activity; and surface waters of the Commonwealth.

Authority and Responsibility of Department or Authorized Conservation Districts – The department added this section to clearly articulate what the authority and responsibilities are of the Department and authorized conservation districts in the PAG-02.

Activities not Eligible for Coverage under this Permit –The department added conditions # 13 and #14 to provide clarity for use of the permit in impaired waters or when there is an established TMDL.

Renewal of Permit – The standard for submitting an administratively complete and acceptable NOI for a permit renewal has been changed from 90 days to at least 180 days. This is consistent with the Chapter 92 regulations that require that permit renewals be submitted at least 180 days before permit expiration. EPA also requires the standard of 180 days to be used for consistency with federal regulations.

Part A, Effluent Limitations – Some rewording was done of this section to make it clear that the permit establishes a narrative performance based effluent limitation in the form of BMPs identified in E&S, PCSM, and PPC plans that control rate, volume and water quality.

Part A, Visual Inspections – This section has been revised to require visual site inspections be conducted “within 24 hours” after each measurable “rainfall” event and should be conducted by personnel “trained and experienced in erosion and sediment control. This provides a clear definitive standard that is not open to interpretation.

Part A, Non-Compliance Reporting – The word “immediately” was replaced with “within 24 hours” to report noncompliance reports to contact the Department or authorized conservation district. This provides a clear definitive standard that is not open to interpretation.

Part B, Permit Modification – The department revised this section to provide clarity that this permit is being authorized for a two-year time frame and to clarify that a permittee must meet new permit conditions when they are issued by the department.

Part B, Transfer of Ownership or Control – The department revised item # 3 (b) and made it separate item # 4. The word “ensure” was also added to the start of item (c) and statement # 5 was added to clarify that upon a change of ownership or control the existing permittee must provide a copy of the permit and approved plans to the new owner and/or co-permittee.

Part B, Adverse Impact – The item was revised to read “The permittee and co-permittee(s) shall take all reasonable steps to prevent, minimize, or cease any discharge in violation of this permit.

Part B, Reduction, Loss, or Failure of BMPs – The department added a second sentence that reads “Such restored BMPs or alternative treatment shall be at least as effective as the original BMPs.

Part B, Termination of Coverage – The department added that “upon “permanent stabilization” of earth disturbance activities an NOT must be submitted. The items also lists what must be submitted with the NOT and notes that until the permittee has received written acknowledgement of the NOT, the permittee will remain responsible for operating and maintaining all E&S BMPs and PCSM BMPs on the project site and will be responsible for violations occurring at the project site. It is anticipated that this revision will ensure that permittee and or co-permittee(s) will submit an NOT since that has sometimes not occurred.

Part B, Completion Certificate and Final Plans – This section was added to state that Within 30 days after the completion of earth disturbance activities authorized by this permit, including the permanent stabilization of the site and proper installation of PCSM BMPs in accordance with the approved PCSM Plan, or upon submission of the NOT if sooner, the permittee shall file with the department or authorized conservation district a statement signed by a licensed professional and by the permittee certifying that work has been performed in accordance with the terms and conditions of this permit and the approved E&S and PCSM Plans. Completion certificates are needed to ensure that all work is preformed in accordance with the terms and conditions of the permit and the approved E&S and PCSM Plans.

Part C, Erosion and Sediment Control Plans – Item (a) has been revised to state that E&S plans must be prepared, developed, and implemented by “qualified personnel” trained and experienced in erosion and sediment control. Item (d) was also added to state that “Prior to proceeding with the bulk earth disturbance activities, the permittee or co-permittee shall provide written notification to the department or authorized conservation district upon the installation of all perimeter sediment control BMPs.” This will assist in ensuring that a permittee and or co-permittee(s) install perimeter controls prior to proceeding with the bulk earth disturbance on the site.

- a. An E&S Plan must be prepared, developed, and implemented by qualified personnel trained and experienced in erosion and sediment control, for each activity covered by this permit in accordance with the department’s Chapter 102 Rules and Regulations and department guidance. Each E&S Plan must be

submitted to the department or authorized conservation district and approved. The BMPs shall be designed to minimize the potential for accelerated erosion and sedimentation in order to protect, maintain, reclaim, and restore water quality and existing and designated uses. Various BMPs and their design standards are listed in the *Erosion and Sediment Pollution Control Program Manual*, No. 363-2134-008, as amended and updated. The manual is available from the department or authorized conservation district or can be downloaded from the department's Web site at www.depweb.state.pa.us. E&S Plans and BMPs, and revisions thereto, which meet the requirements of 25 Pa. Code Chapter 102, are conditions of this permit and incorporated by reference.

- b. E&S Control Plans required under this permit are considered reports that shall be available to the public under Section 607 of the Clean Streams Law and 25 Pa. Code Chapter 92 of the department's regulations. The owner or operator of a facility with stormwater discharges covered by this permit shall make E&S Plans available to the public upon request. E&S Plans must be made available at the site of the construction activity at all times.
- c. The staging of earth disturbance activities and maintenance requirements contained in the approved E&S Plan must be followed.
- d. Upon the installation or stabilization of all perimeter sediment control BMPs and at least 3 days prior to proceeding with the bulk earth disturbance activities, the permittee or co-permittee shall provide notification to the department or authorized conservation district.

Part C, Post Construction Stormwater Management Plans – This section has been extensively revised to read as follows:

- a. A PCSM Plan must be prepared, developed, and implemented for each activity covered by this permit in accordance with the department's 2002 *Comprehensive Stormwater Management Policy*, DEP Policy No. 392-0300-002, and addressed under several regulatory programs administered by the department. These regulatory programs utilize narrative based effluent limitations in the form of BMPs to achieve the regulatory standard to protect, maintain, and improve the commonwealth's water resources through comprehensive site planning and BMP design guidance. Various BMPs and their design standards are listed in the *Pennsylvania Stormwater Best Management Practices Manual*, No. 363-0300-002, as amended and updated. The manual is available from the department or authorized conservation district or can be downloaded from the department's Web site at www.depweb.state.pa.us. Each PCSM Plan must be submitted to the department or authorized conservation district. The PCSM plan must employ stormwater management BMPs to control the volume, rate, and water quality of the postconstruction stormwater runoff so as to protect and maintain the chemical, physical, biological properties and existing/designated uses of the waters of this commonwealth.
- b. PCSM Plans required under this permit are considered reports that shall be available to the public under Section 607 of the Clean Streams Law and 25 Pa. Code Chapter 92 of the department's regulations. The owner or operator of a facility with stormwater discharges covered by this permit shall make PCSM Plans available to the public upon request. The PCSM Plans must be made available at the site of the construction activity at all times.
- c. Permittees and co-permittees are responsible for ensuring that a licensed professional have oversight responsibilities for the design and proper installation of BMPs identified in the PCSM Plan prior to the submission of the NOT for this permit. The licensed professional shall certify that the BMPs identified in the plan have been installed in accordance with the approved plan. The installation schedule of PCSM BMPs and maintenance requirements contained within the approved PCSM Plan must be followed; and failure to comply with the installation schedule is a violation of this permit, the Clean Streams Law, and the Clean Water Act.
- d. The stormwater management program must be consistent with the assumptions and requirements of any available Wasteload Allocations (WLAs) for the discharges as set forth in any applicable Total Maximum Daily Loads (TMDLs) established for the receiving waters.

PREPARDNESS, PREVENTION, AND CONTINGENCY PLANS

If toxic, hazardous, or other polluting materials will be on site, the permittee or co-permittee(s) must develop a PPC Plan for use while those materials are on site. The PPC Plan shall be developed in accordance with department regulations. The PPC Plan shall identify areas which may include, but are not limited to, waste management areas, raw material storage areas, fuel storage areas, temporary and permanent spoils storage areas, maintenance areas, and any other areas that may have the potential to cause noncompliance with the terms and conditions of this permit due to the storage, handling, or disposal of any toxic or hazardous substances such as oil, gasoline, pesticides, herbicides, solvents, etc. BMPs shall be developed and implemented for each identified area. The PPC Plan shall be maintained on site at all times and shall be made available for review by the department, authorized conservation district, or other authorized local, state, or federal agent or representative.

Part C, Preconstruction Conferences –A sentence was added to the end of this item noting the documents that the permittee or co-permittee must bring to a preconstruction conference. The item specifies that they must bring a copy of their NPDES permit, a copy of the stamped plan from the conservation district, and all associated department approvals/permits which must be available at the conference upon request.

Part C, Clean Fill Requirements – This item was added under the Spoil and Borrow area item to read: Any person placing clean fill that has been affected by a spill or release of a regulated substance must use department Form FP-001 to certify the origin of the fill material and the results of the analytical testing to qualify the materials as clean fill. The form must be retained by the owner of the property receiving the fill. Fill material not qualifying as clean fill is regulated fill and must be managed in accordance with the department's municipal or residual waste regulations based on 25 Pennsylvania Code Chapters 287 or 271, whichever is applicable.

Part C, Phased Projects – The department added “and supporting information” to this requirement to clarify that additional materials may be needed to demonstrate compliance with the permit terms and conditions.

Part C, Wetland Protection –A sentence was added at the end which reads “Special precautions must be taken to protect wetlands and other water resources identified in the NOI, plans, and other supporting documents.” This will help to ensure that these sensitive areas are properly addressed in the plans.

Part C, Infiltration BMPs – The department added item # 11 to read “Where infiltration BMPs are being utilized, the permittee and co-permittee must ensure that soil compaction is avoided or minimized in those areas. If the areas planned for infiltration BMPs are compromised, additional soil testing must be performed to verify that the BMP will perform as planned.” This was added to emphasize the importance of protecting areas meant for infiltration BMPs and to ensure that once installed these types of BMPs will function properly.

Part C, Stabilization – The department added item # 12 to read “Upon completion or temporary cessation of the earth disturbance activity the project site shall be immediately stabilized in accordance with the recommendations contained in the *Erosion and Sediment Pollution Control Program Manual (E&S Manual)*, Commonwealth of Pennsylvania, Department of Environmental Protection No. 363-2134-008, April 2000, as amended and updated” An addition was also made to require that PCSM BMPs be operational. These additions were made to clearly identify methods available and the standards to achieve for proper stabilization.

Part C, Sewage Facilities – The department added item # 13 to read “Earth disturbance may not commence until all related Act 537 Sewage Facilities Planning approvals have been obtained.” This means that a site requiring Act 537 approval must obtain that approval before earth disturbance activities begin on the site.

OTHER RESOURCES

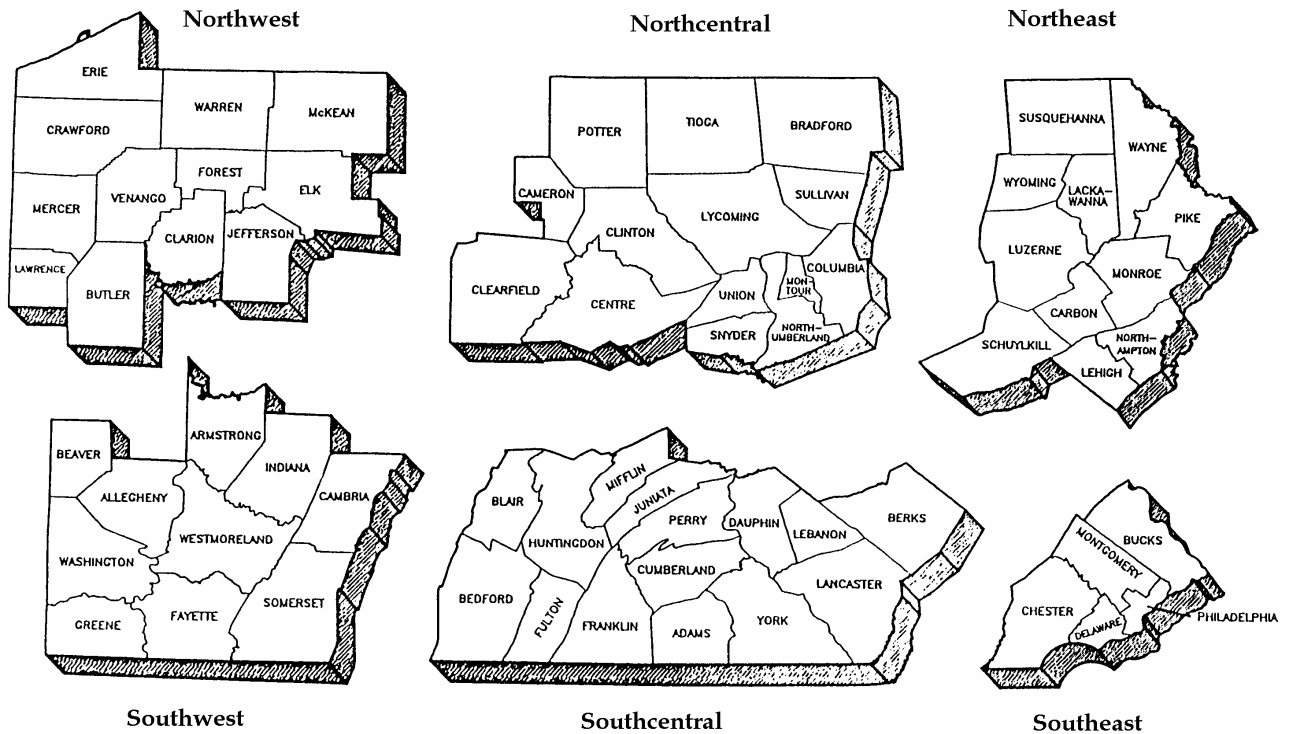
1. Web site with links and electronic resources for NPDES PAG-02 General Permit.

DEP has developed a set of resource materials which are available online at www.depweb.state.pa.us, keyword: stormwater.

For more information,
Call the DEP regional office in your area or contact:

Department of Environmental Protection
Bureau of Watershed Management
Division of Waterways, Wetlands and Stormwater Management
400 Market St.
P.O. Box 8775
Harrisburg, PA 17105
717-787-6827

DEP REGIONAL OFFICES



Southeast Region

2 East Main Street
Norristown, PA 19401
484-250-5970

Counties: Bucks, Chester, Delaware, Montgomery and Philadelphia

Southwest Region

400 Waterfront Drive
Pittsburgh, PA 15222-4745
412-442-4000

Counties: Allegheny, Armstrong, Beaver, Cambria, Fayette, Greene, Indiana, Somerset, Washington and Westmoreland

Southcentral Region

909 Elmerton Ave.
Harrisburg, PA 17110
717-705-4700

Counties: Adams, Bedford, Berks, Blair, Cumberland, Dauphin, Franklin, Fulton, Huntingdon, Juniata, Lancaster, Lebanon, Mifflin, Perry and York

Northwest Region

230 Chestnut St.
Meadeville, PA 16335-3481
814-332-6984

Counties: Butler, Clarion, Crawford, Elk, Erie, Forest, Jefferson, Lawrence, McKean, Mercer, Venango and Warren

Northeast Region

2 Public Square
Wilkes-Barre, PA 18711-0790
570-826-2511

Counties: Carbon, Lackawanna, Lehigh, Luzerne, Monroe, Northampton, Pike, Schuylkill, Susquehanna, Wayne and Wyoming

Northcentral Region

208 W. Third St., Suite 101
Williamsport, PA 17701
570-327-3636

Counties: Bradford, Cameron, Clearfield, Centre, Clinton, Columbia, Lycoming, Montour, Northumberland, Potter, Snyder, Sullivan, Tioga and Union