

Application Type Renewal
 Facility Type Industrial
 Major / Minor Minor

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

Application No. PA0011762
 APS ID 620254
 Authorization ID 1452451

Applicant and Facility Information

Applicant Name	<u>American Nickeloid Company</u>	Facility Name	<u>American Nickeloid Company</u>
Applicant Address	<u>131 Cherry Street</u> <u>Walnutport, PA 18088</u>	Facility Address	<u>131 Cherry Street</u> <u>Walnutport, PA 18088</u>
Applicant Contact	<u>Richard Force</u>	Facility Contact	<u>Richard Force</u>
Applicant Phone	<u>(610) 767-3842</u>	Facility Phone	<u>(610) 767-3842</u>
Client ID	<u>78898</u>	Site ID	<u>246595</u>
SIC Code	<u>3471,3479</u>	Municipality	<u>Walnutport Borough</u>
SIC Description	<u>Manufacturing - Metal Coating and Allied Services, Manufacturing - Plating and Polishing</u>	County	<u>Northampton</u>
Date Application Received	<u>August 28, 2023</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>August 28, 2023</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>Renewal of NPDES permit.</u>		


Summary of Review

Note: The NPDES permit renewal application and several calculations associated with the renewal include confidential production information. Two separate uploads (public and confidential) will be sent to file after issuance of the final NPDES permit.

The applicant is requesting the renewal of an NPDES permit to discharge process/non-process combined wastewater and stormwater into the Lehigh River a TSF/MF (Trout Stocking & Migratory) receiving stream in State Watershed 2-C. Per the Department's current existing use list, the receiving stream does not have an existing use classification that is more protective than the designated use. The discharge is not expected to affect public water supplies.

The facility discharges wastewater associated with metal finishing and electroplating (SIC Codes 3471 & 3479). Water for the facility is provided by various on-site wells. The well water is passed through an ion exchange resin to remove hardness before it is used for the factory processes. Public water, if needed, is available from Walnutport Borough. There are 4 filter presses on site with sludge disposal to a landfill. Outfall 001 accepts IW effluent through IMP 101, a swale discharge, and site stormwater before flowing through a restriction weir. Other discharges of stormwater from the site are conveyed through Outfall 002.

All limitations and monitoring requirements from the previously issued permit are carried over in this renewal at IMP 101, Outfall 001, and Outfall 002. The TDS limits are consistent with DRBC requirements. DRBC Docket D-1985-030-4 doesn't include any additional parameters to add to the NPDES permit. The Oil & Grease and pH maximum limits are derived from PA Chapter 95.2(2)ii and 95.2(1), respectively. TSS limits for Outfall 001 are carried over from the previously issued permit. The 100 mg/L limitation at stormwater-only Outfall 002 is updated to a benchmark value to be consistent with requirements in the latest PAG-03 permit (see below). The technology-based limitations derived from 40 CFR Parts 433 and 465 are below:

Approve	Deny	Signatures	Date
X		 Brian Burden, E.I.T. / Project Manager	June 2, 2026
X		Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Acting Engineer Manager	6-3-26

Summary of Review

Requirements from 40 CFR 433 (best practicable control technology currently available – BPT) are applicable to this facility due to the electroplating and coating processes. The concentration-based limitations from 40 CFR 433.13 are as follows:

Pollutant or pollutant property	Maximum for any 1 day	Monthly average shall not exceed
	Milligrams per liter (mg/l)	
Cadmium (T)	0.69	0.26
Chromium (T)	2.77	1.71
Copper (T)	3.38	2.07
Lead (T)	0.69	0.43
Nickel (T)	3.98	2.38
Silver (T)	0.43	0.24
Zinc (T)	2.61	1.48
Cyanide (T)	1.20	0.65
TTO	2.13	
Oil & Grease	52	26
TSS	60	31
pH	(¹)	(¹)

¹ Within 6.0 to 9.0.

40 CFR 433.12 includes the following:

(a) In lieu of requiring monitoring for TTO, the permittee shall make the following certification statement: “Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation [or pretreatment standard] for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the permitting authority.” as a “comment” on the Discharge Monitoring Report required by 40 CFR 122.44(i), formerly 40 CFR 122.62(i). If monitoring is necessary to measure compliance with the TTO standard, the permittee shall sample industrial for only those pollutants which would reasonably be expected to be present

(b) In requesting the certification alternative, a discharger shall submit a solvent management plan that specifies to the satisfaction of the permitting authority (or, in the case of indirect dischargers, the control authority) the toxic organic compounds used; the method of disposal used instead of dumping, such as reclamation, contract hauling, or incineration; and procedures for ensuring that toxic organics do not routinely spill or leak into the wastewater. For direct dischargers, the permitting authority shall incorporate the plan as a provision of the permit.

The certification statement and management plan are included with the facility’s Toxic Organic Pollutant Management Plan (dated November 1, 1995, revised July 24, 2018) and is incorporated as a provision of the permit. Recent DMRs reviewed during this renewal contain the required certification statement.

A special condition requiring certification for total toxic organics in lieu of monitoring has been continued in this permit as per Part 433.12 at IMP 101. Plant operations include plating, polishing, anodizing, coating, laminating and painting resulting in an annual average treated effluent discharge of 0.018 MGD through IMP 101. IMP 101 has a design flow of 0.045 MGD. The IW effluent is comprised of process water, softener wastewater, boiler blowdown, laboratory wastewater, and reverse osmosis reject and is subject to the BPT standards in 40 CFR Part 433. In 2016 American Nickeloid re-started its metal coating line which is regulated under 40 CFR Part 465 and the required effluent limits and monitoring were added to IMP 101 during the previous permit renewal.

Summary of Review

Requirements from 40 CFR 465 are applicable to the facility due to the coil coating processes performed. 40 CFR 465.11 Subpart A (best practicable control technology currently available – BPT) mass-based limitations for discharges to waters from coating of steel basis material coils are as follows:

Pollutant or pollutant property	BPT effluent limitations			
	Maximum for any 1 day		Maximum for monthly average	
	mg/m ² (pounds per 1 million ft ²) of area processed			
Chromium	1.16	(0.24)	0.47	(0.096)
Cyanide	0.80	(0.17)	0.33	(0.068)
Zinc	3.66	(0.75)	1.54	(0.32)
Iron	3.39	(0.70)	1.74	(0.36)
Oil and grease	55.1	(11.3)	33.1	(6.77)
TSS	113.0	(23.1)	55.1	(11.3)
pH	(¹)	(¹)	(¹)	(¹)

¹ Within the range of 7.5 to 10.0 at all times.

40 CFR 465.21 Subpart B (best practicable control technology currently available – BPT) mass-based limitations for discharges to waters from coating of galvanized basis material coils are as follows:

Pollutant or pollutant property	BPT effluent limitations			
	Maximum for any 1 day		Maximum for monthly average	
	mg/m ² (pounds per 1 million ft ²) of area processed			
Chromium	1.10	(0.23)	0.45	(0.091)
Copper	4.96	(1.02)	2.61	(0.54)
Cyanide	0.76	(0.16)	0.32	(0.064)
Zinc	3.47	(0.71)	1.46	(0.30)
Iron	3.21	(0.66)	1.65	(0.34)
Oil and grease	52.2	(10.7)	31.3	(6.42)
TSS	107.0	(21.9)	52.2	(10.7)
pH	(¹)	(¹)	(¹)	(¹)

¹ Within the range of 7.5 to 10.0 at all times.

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40 CFR 465.31 Subpart C (best practicable control technology currently available – BPT) mass-based limitations for discharges to waters from coating of aluminum basis material coils are as follows:

Pollutant or pollutant property	BPT Effluent limitations			
	Maximum for any 1 day		Maximum for monthly average	
	mg/m ² (pounds per 1 million ft ²) of area processed			
Chromium	1.42	(0.29)	0.58	(0.12)
Cyanide	0.98	(0.20)	0.41	(0.083)
Zinc	4.48	(0.92)	1.89	(0.39)
Aluminum	15.3	(3.14)	6.26	(1.28)
Oil and grease	67.3	(13.8)	40.4	(8.27)
TSS	138.0	(28.3)	67.3	(13.8)
pH	(¹)	(¹)	(¹)	(¹)

¹ Within the range of 7.5 to 10.0 at all times.

To determine how many million square feet of area processed to use in the calculations, the maximum daily production value as reported in the renewal application was used which is consistent with the guidance provided in DEP’s Technical Guidance for the Development and Specification of Effluent Limitations and Other Permit Conditions in NPDES Permits (doc. No. 362-0400-001). Production numbers provided account for both sides of the product. This value was determined by dividing the maximum monthly production by the average amount of production days per month. The values used and calculations can be found in the confidential file. Mass-based limitations from each Subpart were added together to develop the Part A limitations.

pH must be within the range of 7.5 to 9.0 at all times at IMP 101, which is the most stringent of 40 CFR 465 Subparts A, B, and C. At Outfall 001, pH must be within the range of 6.0 to 9.0 at all times.

The discharge was modeled using the Department’s Toxics Management Spreadsheet (TMS) and the pollutant group sampling results provided with the permit renewal application at IMP 101. For modeling inputs, drainage areas were delineated using the USGS StreamStats interactive map, RMIs were obtained using DEP’s eMapPA, and elevations were obtained using the elevation profile tool of StreamStats. The Q₇₋₁₀ calculated by StreamStats was utilized (see Watershed Information attachment). The TMS recommended the following:

Pollutants	Mass Limits		Concentration Limits				Governing WQBEL	WQBEL Basis
	AML (lbs/day)	MDL (lbs/day)	AML	MDL	IMAX	Units		
Total Copper	Report	Report	Report	Report	Report	µg/L	4,357	AFC

Total Copper monitoring/reporting requirements were recommended, however, technology-based limitations are already established in the permit.

The TMS was also used to model the discharge in relation to the nearest downstream public water supply intake location on the Lehigh River near Northampton Borough. Results indicate this discharge is not expected to affect public water supplies.

Stormwater sample results submitted with the renewal application indicate there’s no reasonable potential for stormwater discharges from this site to violate the water quality standards of the Lehigh River. In the previously issued permit, the permittee monitored for pH, TSS, Nitrate-Nitrite as N, Total Aluminum, Total Iron, and Total Zinc. A new PAG-03 industrial stormwater permit was issued by DEP on March 24, 2023 with updated Appendix U requirements for fabricated metal production facilities. Semiannual monitoring/reporting requirements are added to the permit for Oil & Grease, Total Nitrogen

Summary of Review

and Total Phosphorus at Outfalls 001 & 002. Benchmark values are included in the permit for TSS (100 mg/L), pH (9.0 S.U.), Oil & Grease (30 mg/L), and Nitrate-Nitrite as N (3 mg/L) at Outfalls 001 & 002. In the event that stormwater discharge concentrations for these pollutants exceed the benchmark values at the outfall, the permittee shall implement a corrective action plan (2 consecutive exceedances) or consider installing BMPs at the site (4 consecutive exceedances).

All Part C special conditions from the previous permit are carried over. The new template Part C condition titled BMPs to Address Aqueous Film Forming Foam (AFFF) is added to the permit.



TMS PA0011762.pdf



TMS PA0011762
PWS.pdf



Watershed
Information.pdf



1985-030-4.pdf

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.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	<u>001, IMP 101, 002</u>	Design Flow (MGD)	<u>0.045 (IMP 101)</u>
	<u>40° 45' 28.76" (001)</u>		<u>-75° 36' 10.00" (001)</u>
	<u>40° 45' 28.00" (101)</u>		<u>-75° 36' 10.00" (101)</u>
Latitude	<u>40° 45' 21.43" (002)</u>	Longitude	<u>-75° 36' 2.81" (002)</u>
Quad Name	<u>Palmerton</u>	Quad Code	<u>1241</u>
Wastewater Description: <u>IW Process Effluent with ELG</u>			

Receiving Waters	<u>Lehigh River (TSF, MF)</u>	Stream Code	<u>3335</u>
NHD Com ID	<u>26290105</u>	RMI	<u>33.55</u>
Drainage Area	<u>887 mi²</u>	Yield (cfs/mi ²)	<u>0.219</u>
Q ₇₋₁₀ Flow (cfs)	<u>194</u>	Q ₇₋₁₀ Basis	<u>USGS StreamStats</u>
Elevation (ft)	<u>353</u>	Slope (ft/ft)	<u>0.0018</u>
Watershed No.	<u>2-C</u>	Chapter 93 Class.	<u>TSF, MF</u>
Existing Use	<u>-</u>	Existing Use Qualifier	<u>-</u>
Exceptions to Use	<u>-</u>	Exceptions to Criteria	<u>-</u>
Assessment Status	<u>Impaired</u>		
Cause(s) of Impairment	<u>Metals</u>		
Source(s) of Impairment	<u>Acid mine drainage</u>		
TMDL Status	<u>-</u>	Name	<u>-</u>

Background/Ambient Data		Data Source	
pH (SU)	<u>7.0</u>	Default	<u></u>
Temperature (°F)	<u>-</u>	-	<u></u>
Hardness (mg/L)	<u>100</u>	Default	<u></u>
Other:	<u>-</u>	-	<u></u>

Nearest Downstream Public Water Supply Intake	<u>Northampton Borough Municipal Authority</u>		
PWS Waters	<u>Lehigh River</u>	Flow at Intake (cfs)	<u>205</u>
PWS RMI	<u>24.76</u>	Distance from Outfall (mi)	<u>8.8</u>