

Southwest Regional Office CLEAN WATER PROGRAM

 Application Type
 Renewal

 Facility Type
 Storm Water

 Major / Minor
 Minor

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

 Application No.
 PA0217395

 APS ID
 1092008

 Authorization ID
 1445873

Applicant and Facility Information

Applicant Name	Danzer Veneer Americas Inc.	Facility Name	Danzer Veneer Americas – Darlington Plant
Applicant Address	blicant Address 119 Aid Drive		119 Aid Drive
	Darlington, PA 16115-1637		Darlington, PA 16115-1637
Applicant Contact	Tracy Rowlett	Facility Contact	Same as Applicant
Applicant Phone	(724) 827-8366	Facility Phone	Same as Applicant
Applicant Email	tracy.rowlett@danzer.com	Facility Email	Same as Applicant
Client ID	287869	Site ID	462772
SIC Code	2435	Municipality	Darlington Township
SIC Description	Manufacturing - Hardwood Veneer And Plywood	County	Beaver
Date Application Rece	eivedJune 29, 2023	EPA Waived?	Yes
Date Application Acce	epted July 5, 2023	If No, Reason	
Purpose of Application	n Renewal NPDES Permit Coverage).	

Summary of Review

The Department received a renewal NPDES permit application from Liberty Environmental, Inc. on behalf of Danzer Veneer Americans, Inc. on June 29, 2023 for the coverage of their Darlington Plant. The site is a wood products manufacturing facility with an SIC code of 2435, Hardwood Veneer/Veneer Manufacturing.

The site receives sliced veneer as raw materials and finished products. Veneer is then clipped, graded, sorted and sold from the facility. The facility also processes thick veneer cut for flooring. The flooring is brought in from production facilities off site, kiln dried, sorted and cut to size. Previously, the facility had an active log yard, but currently there are no activities in the area. Wet decking is no longer conducted at the site, as well. Veneer and flooring are received at the facility in the shipping docks, under roof inside the facility. This veneer is then stored prior to any processing. Forklifts are used in the facility for the movement of this veneer, including loading and unloading of trucks.

The forklifts on site use propane which is stored in 2 bulk tanks and transferred to 33-pound tanks for use on the forklifts. Another fuel source is diesel, which is stored in a 525-gallon tank in the log yard. Diesel is used for the mobile equipment located in the log yard. The diesel fuel tank is equipped with a secondary containment structure that does not collect rainwater. An employee is always present when fuel is transferred and there is a spill kit located beside this tank. Oils, lubricants and other liquid chemicals or waste are handled and stored inside within 55-gallon drums, on a contained concrete floor. Boiler chemicals are stored within the boiler-room. All floor drains in the boiler area are connected to the wastewater treatment plant. Spill kits are located in the shipping area, the boiler room, and near the fuel tanks.

The site has two outfalls that discharge to North Fork of the Little Beaver Creek, designated in 25 PA Code Chapter 93 as a High-Quality Cold-Water Fishery. Both outfalls receive stormwater only. The stormwater that discharges via Outfall 001 is

Approve	Deny	Signatures	Date
х		Adam Olesnanik, P.E. / Environmental Engineer	November 8, 2023
х		Michael E. Fifth, P.E. / Environmental Engineer Manager	November 11, 2023

Summary of Review

from roofs and gutters of the production building, parking lot, and loading/unloading area. The stormwater that discharges via Outfall 002 is from roofs and gutters of the warehouse and office building and a parking lot. The outfalls are equipped with oil booms and are checked monthly.

The site withdraws well water for production uses for boiler/blowdown and restrooms. The site treats the well water with two water softeners and a reverse osmosis unit. The only discharges from the site is stormwater. The boiler/blowdown, the backwash of the water softeners, and the reverse osmosis reject water are sent to a holding tank at the wastewater treatment plant. The wastewater treatment plant is not in operation at this time and any water accumulated in the storage tank is hauled to a local POTW. The restrooms discharge to two (2) sand mound systems.

The site has no open violations. The site was last inspected September 9, 2021, no violations were noted.

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 Inform	nation	
Outfall No. <u>001</u> Latitude <u>40º 41</u> Quad Name <u>Nev</u> Wastewater Descrip	7' 44.80" w Galilee otion: <u>Stormwater</u>	Design Flow (MGD) Longitude Quad Code	0 -80° 27' 57.80" 1202
Receiving Waters NHD Com ID Drainage Area Q ₇₋₁₀ Flow (cfs) Elevation (ft) Watershed No. Existing Use Exceptions to Use	North Fork Little Beaver Creek 99676962 96.7 2.2 960 20-B	Stream Code RMI Yield (cfs/mi ²) Q ₇₋₁₀ Basis Slope (ft/ft) Chapter 93 Class. Existing Use Qualifier Exceptions to Criteria	33323 3.83 0.0228 StreamStats 0.0001 HQ-CWF
Cause(s) of Impairn Source(s) of Impairn TMDL Status Nearest Downstrear PWS Waters PWS RMI	ment	Name Unknown, greater than 4 miles Flow at Intake (cfs) Distance from Outfall (mi)	s in Ohio

Discharge, Receiving	g Waters and Water Supply Inform	nation	
Outfall No. 002		Design Flow (MGD)	0
Latitude 40° 4	7' 45.14"	Longitude	-80° 27' 44.87"
Quad Name Ne	w Galilee	Quad Code	1202
Wastewater Descrip	otion: Stormwater		
Passiving Waters	North Fork Little Resver Creek	Stroom Codo	22222
NHD Com ID	99676962		4.07
Drainage Area	96.7	Yield (cfs/mi ²)	0.0228
Q ₇₋₁₀ Flow (cfs)	2.2	Q ₇₋₁₀ Basis	StreamStats
Elevation (ft)	960	Slope (ft/ft)	0.0001
Watershed No.	20-B	Chapter 93 Class.	HQ-CWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Attaining Use(s)		
Cause(s) of Impairn	nent		
Source(s) of Impair	ment		
TMDL Status		Name	
Nearest Downstrea	m Public Water Supply Intake	Unknown, greater than 4 miles	s in Ohio
PWS Waters		Flow at Intake (cfs)	
PWS RMI		Distance from Outfall (mi)	

Development of Effluent Limitations

Outfall No.	001	Design Flow (MGD)	0
Latitude	40° 47' 44.80"	Longitude	-80º 27' 57.80"
Outfall No.	002	Design Flow (MGD)	0
Latitude	40º 47' 45.14"	Longitude	-80º 27' 44.87"
Wastewater Description: Stormwater			

Technology-Based Limitations

Federal Effluent Limitation Guidelines (ELGs)

Based on the site's SIC code, 2435 Hardwood Veneer and Plywood, the operations would be subject to the ELGs in 40 CFR 429.33, Subpart B; however, the only discharge from the site is stormwater and not production related wastewater. Therefore, no effluent limits based on 40 CFR 429 will be imposed.

Stormwater Technology Limits

Outfalls 001 and 002 will be subject to PAG-03 General Stormwater Permit conditions as a minimum requirement because the outfalls receive stormwater. The SIC code for the site is 2435 and the corresponding appendix of the PAG-03 that would apply to the facility is Appendix D. The reporting requirements applicable to stormwater discharges are shown in Table 1 below. Monitoring for Pentachlorophenol, Total Arsenic, Total Chromium, and Total Copper are included in the PAG-03 if the site uses chlorophenolic formulations or arsenic/chromium/copper formulations. The site does not use these formulations; therefore, monitoring for these parameters will not be include in the Draft Permit. Along with the monitoring requirements, sector specific BMPs included in Appendix D of the PAG-03 will also be included in Part C of the Draft Permit.

Parameter	Max Daily Concentration	Measurement Frequency	Sample Type
Total Nitrogen	Monitor and Report	1/6 Months	*Calculation
Total Phosphorus	Monitor and Report	1/6 Months	Grab
рН	Monitor and Report	1/6 Months	Grab
Chemical Oxygen Demand (COD)	Monitor and Report	1/6 Months	Grab
Total Suspended Solids (TSS)	Monitor and Report	1/6 Months	Grab

Table 1: PAG-03 Appendix (D) Monitoring Requirements

*Total Nitrogen is the sum of Total Kjeldahl-N (TKN) plus Nitrite-Nitrate as N (NO₂+NO₃-N), where TKN and NO₂+NO₃-N are measured in the same sample.

Water Quality-Based Limitations

Stormwater WQBELs

Water quality analyses are typically performed under low-flow (Q7-10) conditions. Stormwater discharges occur at variable rates and frequencies but not however during Q7-10 conditions. Since the discharges from Outfalls 001 and 002 are composed entirely of stormwater, a formal water quality analysis cannot be accurately conducted. Accordingly, water quality-based effluent limitations based on water quality analyses are not proposed.

Anti-Degradation

Antidegradation regulations under Chapter 93.4c(a)(I)(i) required discharges to protect the existing use of receiving waters. Chapter 93.4c(b) requires dischargers to consider non-discharge alternatives, public participation and social/economic justification when proposing new, additional or increased discharges to high quality or exceptional value streams. Existing use protection required under Chapter 93.4c(a)(I)(i) is ensured for discharges to high quality streams imposing the most stringent of technology-based, water quality based and non-degrading effluent limitations. In this case, non-degradation effluent limitations are not applicable because the discharge is stormwater and the permittee is not proposing any new, additional or increased discharges from the site.

Anti-Backsliding

Previous limits can be used pursuant to EPA's anti-backsliding regulation, 40 CFR 122.44(I) and are displayed below in Table 2.

Table 2. Proposed Endent Monitoring Requirements					
Parameter	Max Daily Concentration	Benchmark Values (mg/L)	Measurement Frequency	Sample Type	
pH (S.U)	Monitor and Report	XXX	1/6 Months	Grab	
Chemical Oxygen Demand (COD)	Monitor and Report	120	1/6 Months	Grab	
Total Suspended Solids (TSS)	Monitor and Report	100	1/6 Months	Grab	

Table 2: Proposed Effluent Monitoring Requirements

Proposed Effluent Limitations and Monitoring Requirements

The proposed effluent monitoring requirements for Outfall 001 and 002 are displayed in Table 3 below, they are the most stringent values from the above effluent limitation development. A Part C condition is included in the Draft Permit requiring a Corrective Action Plan when there are two consecutive exceedances of the benchmark values, which are also included in the Part C condition. The benchmark values are also displayed below in table 3. Note that there is now a Benchmark of 9.0 S.U. for pH. These values are not effluent limitations, an exceedance of the benchmark value is not a violation. As describe above, if there are two consecutive exceedances of the benchmark value, a correction action plan must be conducted to evaluate site stormwater controls and BMPs. Benchmark monitoring is a feedback tool, along with routine inspections and visual assessments, for assessing the effectiveness of stormwater controls and BMPs. An exceedance of the benchmark provides permittees with an indication that the facility's controls may not be sufficiently controlling pollutants in stormwater.

Table 3: Proposed Effluent Monitoring Requirements

Parameter	Max Daily Concentration	Benchmark Values (mg/L)	Measurement Frequency	Sample Type
Total Nitrogen	Monitor and Report	XXX	1/6 Months	*Calculation
Total Phosphorus	Monitor and Report	XXX	1/6 Months	Grab
pH (S.U)	Monitor and Report	9.0	1/6 Months	Grab
Chemical Oxygen Demand (COD)	Monitor and Report	120	1/6 Months	Grab
Total Suspended Solids (TSS)	Monitor and Report	100	1/6 Months	Grab

Tools and References Used to Develop Permit		
	WQM for Windows Model (see Attachment)	
	Toxics Management Spreadsheet (see Attachment)	
	TRC Model Spreadsheet (see Attachment)	
	Temperature Model Spreadsheet (see Attachment)	
	Water Quality Toxics Management Strategy, 361-0100-003, 4/06.	
	Technical Guidance for the Development and Specification of Effluent Limitations, 386-0400-001, 10/97.	
	Policy for Permitting Surface Water Diversions, 386-2000-019, 3/98.	
	Policy for Conducting Technical Reviews of Minor NPDES Renewal Applications, 386-2000-018, 11/96.	
	Technology-Based Control Requirements for Water Treatment Plant Wastes, 386-2183-001, 10/97.	
	Technical Guidance for Development of NPDES Permit Requirements Steam Electric Industry, 386-2183-002, 12/97.	
	Pennsylvania CSO Policy, 386-2000-002, 9/08.	
	Water Quality Antidegradation Implementation Guidance, 391-0300-002, 11/03.	
	Implementation Guidance Evaluation & Process Thermal Discharge (316(a)) Federal Water Pollution Act, 386-2000-008, 4/97.	
	Determining Water Quality-Based Effluent Limits, 386-2000-004, 12/97.	
	Implementation Guidance Design Conditions, 386-2000-007, 9/97.	
	Technical Reference Guide (TRG) WQM 7.0 for Windows, Wasteload Allocation Program for Dissolved Oxygen and Ammonia Nitrogen, Version 1.0, 386-2000-016, 6/2004.	
	Interim Method for the Sampling and Analysis of Osmotic Pressure on Streams, Brines, and Industrial Discharges, 386-2000-012, 10/1997.	
	Implementation Guidance for Section 95.6 Management of Point Source Phosphorus Discharges to Lakes, Ponds, and Impoundments, 386-2000-009, 3/99.	
	Technical Reference Guide (TRG) PENTOXSD for Windows, PA Single Discharge Wasteload Allocation Program for Toxics, Version 2.0, 386-2000-015, 5/2004.	
	Implementation Guidance for Section 93.7 Ammonia Criteria, 386-2000-022, 11/97.	
	Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers, 386-2000-013, 4/2008.	
	Implementation Guidance Total Residual Chlorine (TRC) Regulation, 386-2000-011, 11/1994.	
	Implementation Guidance for Temperature Criteria, 386-2000-001, 4/09.	
	Implementation Guidance for Section 95.9 Phosphorus Discharges to Free Flowing Streams, 386-2000-021, 10/97.	
	Implementation Guidance for Application of Section 93.5(e) for Potable Water Supply Protection Total Dissolved Solids, Nitrite-Nitrate, Non-Priority Pollutant Phenolics and Fluorides, 386-2000-020, 10/97.	
	Field Data Collection and Evaluation Protocol for Determining Stream and Point Source Discharge Design Hardness, 386-2000-005, 3/99.	
	Implementation Guidance for the Determination and Use of Background/Ambient Water Quality in the Determination of Wasteload Allocations and NPDES Effluent Limitations for Toxic Substances, 386-2000-010, 3/1999.	
	Design Stream Flows, 386-2000-003, 9/98.	
	Field Data Collection and Evaluation Protocol for Deriving Daily and Hourly Discharge Coefficients of Variation (CV) and Other Discharge Characteristics, 386-2000-006, 10/98.	
	Evaluations of Phosphorus Discharges to Lakes, Ponds and Impoundments, 386-3200-001, 6/97.	
	Pennsylvania's Chesapeake Bay Tributary Strategy Implementation Plan for NPDES Permitting, 4/07.	
	SOP:	
	Other:	

