pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southeast Regional Office
CLEAN WATER PROGRAM

Application Type	**New**	Application No.	**PA0245674**
Facility Type	**Storm Water**	APS ID	**1119309**
Major / Minor	**Minor**	Authorization ID	**1494892**

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

Applicant and Facility Information

Applicant Name	**Penn Color Inc.**	Facility Name	**Penn Color Hatfield Plant**
Applicant Address	2801 Richmond Road	Facility Address	2755 Bergey Road
	Hatfield, PA 19440-1808		Hatfield, PA 19440-1758
Applicant Contact	Jeffrey Zaskoda	Facility Contact	Jeffrey Zaskoda
Applicant Phone	(215) 997-2221	Facility Phone	(215) 997-2221
Client ID	65245	Site ID	502541
SIC Code	2851	Municipality	Hatfield Township
SIC Description	Manufacturing - Paints and Allied Products	County	Montgomery
Date Application Received	July 11, 2024	EPA Waived?	Yes
Date Application Accepted		If No, Reason	

Purpose of Application

Summary of Review

This facility was previously covered under a General Stormwater Permit, PAR150003 issued in 2012 and is located on the corner of 2755 Bergey Road and 2801 Richmond Road in Hatfield Township. On January 26, 2023 the facility submitted a Notice of Intent (NOI) for the PAG03 permit renewal. Based on the review, Department requested the facility to conduct Perfluorooctane Sulfonate (PFOS) sampling analysis on their discharge due to the receiving stream impairment for PFOS. Subsequently on June 2, 2023 PFOS sampling results were submitted for all three outfalls discharging from the site. The results showed elevated levels of PFOS in the discharge.

A determination was made that the stormwater discharge from the facility's site can be more appropriately controlled under an individual permit. As a result, a new Individual Stormwater Application is submitted for the continuation of the coverage for the facility's discharge.

Penn Color is a worldwide manufacturer of pigment dispersions sold to manufacturers requiring color bases in their products. Facility operates a pigment dispersions and thermoplastic (resin and pigment blending) manufacturing plant. There are two main operations buildings at the Hatfield Facility known as the dry building and the wet building. Raw and processing materials include: Solid pigments, Polymers/resins, plasticizers, solvents, blended solvents, liquid nitrogen, and #2 fuel oil.

Site stormwater flow is generally west to east toward a tributary of the West Branch Neshaminy Creek. The facility has three permitted stormwater outfalls located on the facility property but outside of the fence line.

Outfall 001 collects stormwater from the north and east sides of the dry building and the area near the maintenance building.

Outfall 002 collects stormwater from the area on the west side of the dry building and tank farm A.

Approve	Deny	Signatures	Date
X		*Sara Abraham* Sara Reji Abraham, E.I.T. / Project Manager	August 14, 2024
X		*Pravin Patel* Pravin C. Patel, P.E. / Environmental Engineer Manager	08/15/2024

Summary of Review

Outfall 003 collects stormwater from the area surrounding the wet building, the thermal oxidizer, and tank farm B. Stormwater collets in a detention basin that discharges to the outfall located immediately outside of the fence line.

Review of the sampling results shows no concern for any parameters except PFOS. The discharge concentration reported in the application for PFOS are 24.6 ng/l for Outfall 001, 1050 ng/l for Outfall 002 and 425 ng/l for Outfall 003. According to the guidance, quarterly monitoring for the parameters PFOA, PFOS, HFPO-DA and PFBS is included in the permit. A PFAS reduction plan is also included in Part C of the permit.

PAG03 General Permit Appendix F is applicable to the facility's operation. Semiannual monitoring is included for the Parameters pH, COD, TSS, Nitrate-Nitrite as N, Total Nitrogen, Total Phosphorus, Total Aluminum, Total Iron, Total Lead and Total Zinc in consistent with the General Permit.

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.

Act 14 Notifications:

Hatfield Township	-	July 10, 2024
Montgomery County	-	July 10, 2024

Permit Conditions:

A. Stormwater Outfalls
B. Best Management Practices
C. Stormwater Monitoring Requirements
D. Routine Inspections
E. PPC Plan Requirement
F. Acquire Necessary Property Rights
G. Proper Sludge Disposal
H. PFAS Reduction Plan

Discharge, Receiving Waters and Water Supply Information

Outfall No.	001	Design Flow (MGD)	0
Latitude	40º 17' 38.98"	Longitude	-75º 17' 40.61"
Wastewater Description:	Stormwater		
Receiving Waters	Unnamed Tributary to West Branch Neshaminy Creek (WWF, MF)	Stream Code	02894
NHD Com ID	25484736	RMI	1.29
Watershed No.	2-F	Chapter 93 Class.	WWF, MF
Assessment Status	Impaired		
Cause(s) of Impairment	flow regime modification, siltation		
Source(s) of Impairment	rural (residential areas)		
TMDL Status	Final	Name	Neshaminy Creek

Discharge, Receiving Waters and Water Supply Information

Outfall No.	002	Design Flow (MGD)	0
Latitude	40º 17' 35.00"	Longitude	-75º 17' 39.88"
Wastewater Description:	Stormwater		
Receiving Waters	Unnamed Tributary to West Branch Neshaminy Creek (WWF, MF)	Stream Code	02894
NHD Com ID	25484736	RMI	1.21
Watershed No.	2-F	Chapter 93 Class.	WWF, MF
Assessment Status	Impaired		
Cause(s) of Impairment	flow regime modification, siltation		
Source(s) of Impairment	rural (residential areas)		
TMDL Status	Final	Name	Neshaminy Creek

Discharge, Receiving Waters and Water Supply Information

Outfall No.	003	Design Flow (MGD)	0
Latitude	40º 17' 33.01"	Longitude	-75º 17' 38.99"
Wastewater Description:	Stormwater		
Receiving Waters	Unnamed Tributary to West Branch Neshaminy Creek (WWF, MF)	Stream Code	02894
NHD Com ID	25484736	RMI	1.17
Watershed No.	2-F	Chapter 93 Class.	WWF, MF
Assessment Status	Impaired		
Cause(s) of Impairment	flow regime modification		
Source(s) of Impairment	rural (residential areas)		
TMDL Status	Final	Name	Neshaminy Creek

Compliance History

DMR Data for Outfall 001 (from July 1, 2023 to June 30, 2024)

Parameter	JUN-24	MAY-24	APR-24	MAR-24	FEB-24	JAN-24	DEC-23	NOV-23	OCT-23	SEP-23	AUG-23	JUL-23
pH (S.U.) Daily Maximum	7.6						7.7					
COD (mg/L) Daily Maximum	6.6						32.0					
TSS (mg/L) Daily Maximum	6.9						11.0					
Nitrate-Nitrite (mg/L) Daily Maximum	1.25						1.45					
Total Nitrogen (mg/L) Daily Maximum	1.8						E					
Total Phosphorus (mg/L) Daily Maximum	0.062						0.023					
Total Aluminum (mg/L) Daily Maximum	0.089						0.304					
Total Iron (mg/L) Daily Maximum	0.11						0.895					
Total Lead (mg/L) Daily Maximum	0.00058						0.0028					
Total Zinc (mg/L) Daily Maximum	0.063						0.183					

DMR Data for Outfall 002 (from July 1, 2023 to June 30, 2024)

Parameter	JUN-24	MAY-24	APR-24	MAR-24	FEB-24	JAN-24	DEC-23	NOV-23	OCT-23	SEP-23	AUG-23	JUL-23
pH (S.U.) Daily Maximum	7.6						7.1					
COD (mg/L) Daily Maximum	24						34.9					
TSS (mg/L) Daily Maximum	18.4						28.8					
Nitrate-Nitrite (mg/L) Daily Maximum	0.52						0.41					
Total Nitrogen (mg/L) Daily Maximum	1.7						E					

Total Phosphorus (mg/L) Daily Maximum	0.15						0.052					
Total Aluminum (mg/L) Daily Maximum	0.5						0.839					
Total Iron (mg/L) Daily Maximum	0.79						1.69					
Total Lead (mg/L) Daily Maximum	0.0033						0.0052					
Total Zinc (mg/L) Daily Maximum	0.12						0.127					

DMR Data for Outfall 003 (from July 1, 2023 to June 30, 2024)

Parameter	JUN-24	MAY-24	APR-24	MAR-24	FEB-24	JAN-24	DEC-23	NOV-23	OCT-23	SEP-23	AUG-23	JUL-23
pH (S.U.) Daily Maximum	7.5						7.6					
COD (mg/L) Daily Maximum	3.5						12.4					
TSS (mg/L) Daily Maximum	6.0						3.3					
Nitrate-Nitrite (mg/L) Daily Maximum	0.76						0.47					
Total Nitrogen (mg/L) Daily Maximum	0.73						E					
Total Phosphorus (mg/L) Daily Maximum	0.025						0.031					
Total Aluminum (mg/L) Daily Maximum	0.027						0.0997					
Total Iron (mg/L) Daily Maximum	2.5						1					
Total Lead (mg/L) Daily Maximum	0.00053						0.00053					
Total Zinc (mg/L) Daily Maximum	0.0068						0.0169					

Compliance History

Proposed Effluent Limitations and Monitoring Requirements

Outfall 001, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Nitrate-Nitrite	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Lead	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Zinc	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
PFOA (ng/L)	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
PFOS (ng/L)	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
PFBS (ng/L)	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
HFPO-DA (ng/L)	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab

Proposed Effluent Limitations and Monitoring Requirements

Outfall 002, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Nitrate-Nitrite	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Lead	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Zinc	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
PFOA (ng/L)	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
PFOS (ng/L)	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
PFBS (ng/L)	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
HFPO-DA (ng/L)	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab

Proposed Effluent Limitations and Monitoring Requirements

Outfall 003, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Nitrate-Nitrite	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Lead	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Zinc	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
PFOA (ng/L)	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
PFOS (ng/L)	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
PFBS (ng/L)	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
HFPO-DA (ng/L)	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab