

Application Type Renewal
Facility Type Storm Water
Major / Minor Minor

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

Application No. PAS203504
APS ID 746245
Authorization ID 1449572

Applicant and Facility Information

Applicant Name	<u>Contech Engineered Solutions LLC</u>	Facility Name	<u>Contech Engineered Solutions Greencastle</u>
Applicant Address	<u>9100 Centre Pointe Drive West Chester, OH 45069-4846</u>	Facility Address	<u>600 N Washington Street Greencastle, PA 17225-1240</u>
Applicant Contact	<u>Charles Wolfe</u>	Facility Contact	<u>Christopher Hallam</u>
Applicant Phone	<u>(800) 338-1122</u>	Facility Phone	<u>(717) 597-2148</u>
Client ID	<u>286945</u>	Site ID	<u>466376</u>
SIC Code	<u>3317,3444</u>	Municipality	<u>Greencastle Borough</u>
SIC Description	<u>Manufacturing - Sheet Metal Work, Manufacturing - Steel Pipe And Tubes</u>	County	<u>Franklin</u>
Date Application Received	<u>August 4, 2023</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>December 15, 2023</u>	If No, Reason	<u></u>
Purpose of Application	<u>NPDES discharge of stormwater associated with industrial activity.</u>		

Summary of Review

This is a renewal application for an NPDES individual permit for discharges of stormwater associated with industrial activity located in Greencastle Borough, Franklin County. See Figures 1 through 4 for site maps.

Facility Description: Steel pipe production.

The facility's primary SIC code listed on the renewal application is 3317 (manufacturing – sheet metal work). The facility listed SIC code 3444 (manufacturing – steel pipe and tubes) on previous permit applications. SIC codes 3317 and 3444 require a NPDES permit for discharges of stormwater associated with industrial activity. Since the facility discharges to an HQ surface water, the facility does not qualify for a PAG-03 general permit. Therefore, the facility must be covered under an individual permit for discharges of stormwater associated with industrial activity. If the facility qualified for a PAG-03, they would fall under Appendix B (Primary Metals) based on SIC code 3317 and they would fall under Appendix U (Fabricated Metal Products) based on SIC code 3444.

Currently, the facility is covered under PAS203504, which was effective 02/01/2019 and expired 01/31/2024. The renewal application was received 08/04/2023 via OnBase 117735. A completeness deficiency letter was issued 08/08/2023 via email. The completeness deficiencies were addressed on 12/15/2023 via email. A technical deficiency letter was issued 12/15/2023 via email. The technical deficiencies were addressed on 02/08/2024 via email.

On 02/20/2024, an inspection of the site by DEP resulted in a discharge violation. The permittee responded to the violation on 04/24/2024 via email that site staff installed a filter system to the hose between the sump pump and the point of discharge at the reroll area. A follow-up inspection by DEP on 03/18/2025 concluded that the remedial actions taken have corrected the violation and the violation was closed. The 03/18/2025 inspection report was issued by DEP via email on 02/06/2026.

Approve	Deny	Signatures	Date
X		<i>Jacob S. Rakowsky</i> Jacob S. Rakowsky, E.I. / Project Manager	03/25/2026
X		<i>Scott M. Arwood</i> Scott M. Arwood, P.E. / Environmental Engineer Manager	03/26/2026

Summary of Review

When reviewing the revised application and facility records, it was observed that the benchmark of 100 mg/L for Total Suspended Solids (TSS) was exceeded for two or more consecutive monitoring periods at Outfall 001. Per Part C.V.F of the permit, a corrective action plan (CAP) had to be submitted for the exceedances. A request for a CAP was sent via email on 02/19/2026. A CAP was received via email on 03/10/2026. See Attachment A.

The facility has one outfall: Outfall 001. Outfall 001 is located near the northwest portion of the property. The entire site drains to Outfall 001. Stormwater discharge at Outfall 001 leaves the site and flows northwest until it reaches UNT 59848 to Muddy Run (HQ-CWF, MF).

The PPC Plan was last updated March 2023.

Part C permit conditions require semiannual site inspections as well as implementation of BMPs and implementation of the facility PPC plan. Given the BMPs in place, the discharge is not expected to have any measurable effect on the water quality of the receiving stream.

EPA waiver is in effect.

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</u>	Design Flow (MGD)	<u>N/A (stormwater)</u>
Latitude	<u>39° 48' 2.6352"</u>	Longitude	<u>-77° 43' 21.7236"</u>
Wastewater Description: <u>Stormwater associated with industrial activity.</u>			
Receiving Waters	<u>Unnamed Tributary to Muddy Run (HQ-CWF, MF)</u>	Stream Code	<u>59848</u>
NHD Com ID	<u>49479356</u>	RMI	<u>0.52</u>
Drainage Area	<u>3.47 sq. mi.</u>	Yield (cfs/mi ²)	<u></u>
Q ₇₋₁₀ Flow (cfs)	<u>0.95</u>	Q ₇₋₁₀ Basis	<u>StreamStats</u>
Watershed No.	<u>13-C</u>	Chapter 93 Class.	<u>HQ-CWF, 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>HABITAT ALTERATIONS, ORGANIC ENRICHMENT, SILTATION, PATHOGEN</u>		
Source(s) of Impairment	<u>AGRICULTURE, AGRICULTURE, AGRICULTURE, UNKNOWN</u>		
TMDL Status	<u></u>	Name	<u></u>
Nearest Downstream Public Water Supply Intake	<u>None in Pennsylvania. 15 miles to Maryland border.</u>		
PWS Waters	<u>Conococheague Creek</u>	Municipality	<u>Antrim Twp & Montgomery Twp, Franklin County</u>
PWS RMI	<u>0.0</u>	Distance from Outfall (mi)	<u>15</u>

Drainage Area (sf): 783,499

% Impervious: 85%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:
 Steel pipe, plastic, fiberglass / forklift operations.

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:
 None.

Compliance History	
Summary of DMRs:	<p>A summary of eDMR data can be found in Table 1 below. Additional application sampling results can be found in Table 2 below.</p> <p>The facility was required to submit impairment sampling results for the siltation, organic enrichment, and pathogens impairment of the receiving water. The discharge is not expected to cause or contribute to an impairment.</p> <p>The facility is up to date on their eDMR submissions.</p>
Summary of Inspections:	<p>The facility was inspected on 02/20/2024. A violation was noted for an unauthorized, unpermitted discharge of industrial waste. A follow-up inspection was conducted on 03/18/2025. The facility corrected the violation and the violation was closed.</p> <p>The client currently has no open violations that should affect issuance of the final permit.</p>

Table 1. Last 3 Years of eDMR Sampling Results for Outfall 001.

Monitoring Period	Outfall 001						
	pH (S.U)	TSS (mg/L)	Nitrate-Nitrite as N (mg/L)	Total Iron (mg/L)	Total Manganese (mg/L)	Total Zinc (mg/L)	Total Aluminum (mg/L)
2025 2 nd Half	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge
2025 1 st Half	6.47	284	E	3.94	0.0956	0.35	3.18
2024 2 nd Half	6.49	506	2.285	5.14	0.132	0.521	3.56
2024 1 st Half	8.05	1064	35.958	3.05	0.0642	0.688	2.42
2023 2 nd Half	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge
2023 1 st Half	6.58	128	1.74	2.04	0.0578	0.272	1.4
Avg.	6.90	495.5	13.328	3.54	0.087	0.458	2.64
Max.	8.05	1064	35.958	5.14	0.132	0.688	3.56

Table 2. Additional Application Sampling Results (2024)

Pollutant	Outfall 001
Oil and Grease (mg/L)	10
BOD5 (mg/L)	777
COD (mg/L)	1320
TSS (mg/L)	1064
TN (mg/L)	35.958
TP (mg/L)	ND
pH (S.U.)	8.05
Nitrate-Nitrogen (mg/L)	35.4
Nitrite-Nitrogen (mg/L)	0.558
Total Aluminum (mg/L)	2.42
Total Iron (mg/L)	3.05
Total Manganese (mg/L)	0.0642
Total Zinc (mg/L)	0.688
E. Coli. (MPN/100mL)	3465.8
Fecal coliform (col/100mL)	3200
Total Organic Carbon (mg/L)	1.92
TKN (mg/L)	ND

Summary of Sampling Results:

The values in red in Tables 1 and 2 exceeded typical PAG-03 benchmarks or permit limits. The applicable PAG-03 benchmarks include: 30 mg/L for Oil and Grease; 30 mg/L for BOD5; 120 mg/L for COD; 100 mg/L for TSS; 9.0 S.U. for pH; 3.0 mg/L for Nitrate + Nitrite-Nitrogen; 2,000 mg/L for chloride. PAG-03 benchmarks were exceeded for BOD5, COD, Nitrate + Nitrite-Nitrogen, and TSS at Outfall 001. The previous permit included a benchmark of 100 mg/L for TSS. The previous permit did not include limits

Based on the facility's **SIC code of 3317**, the applicable PAG-03 NPDES Permit for Discharges of Stormwater Associated with Industrial Activity (effective 3/24/2023) appendix is **Appendix B**, which would include semiannual monitoring of TN, TP, TSS, Oil and Grease, Total Aluminum, Total Copper, Total Iron, Total Lead, and Total Zinc.

Based on the facility's **SIC code of 3444**, the applicable PAG-03 NPDES Permit for Discharges of Stormwater Associated with Industrial Activity (effective 3/24/2023) appendix is **Appendix U**, which would include semiannual monitoring of TN, TP, pH, TSS, Oil and Grease, Nitrate + Nitrite-Nitrogen, Total Aluminum, Total Iron, and Total Zinc.

The facility's previous permit included semiannual monitoring of pH, TSS, Nitrate + Nitrite-Nitrogen, Total Aluminum, Total Iron, Total Manganese, and Total Zinc. Total Manganese was listed on previous applications as a potential pollutant of concern.

A CAP was required to be submitted for the consecutive TSS exceedances at Outfall 001. See Attachment A.

Proposed Effluent Limitations and Monitoring Requirements

All parameters from PAG-03 Appendix B and PAG-03 Appendix U are included in this permit renewal for Outfall 001. All parameters from the previous permit are included in this permit renewal for Outfall 001. Additionally, BOD5 and COD monitoring has been added to Outfall 001 due to their exceedances of typical PAG-03 benchmarks in the renewal application.

Table 3. Proposed Monitoring Requirements for Outfall 001.

Parameter	Effluent Limitations				Monitoring Requirements ^{(1),(2)}	
	Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	Report	XXX	1/6 months	Grab
Biochemical Oxygen Demand (BOD5) (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Chemical Oxygen Demand (COD) (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Suspended Solids (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Nitrate-Nitrite as N (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen (mg/L) ⁽³⁾	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Aluminum, Total (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Lead, Total (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Manganese, Total (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Zinc, Total (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab

Footnotes

- (1) The permittee shall conduct additional monitoring if specified by DEP in the letter authorizing permit coverage or other correspondence.
- (2) This is the minimum number of sampling events required. Permittees are encouraged, and it may be advantageous in demonstrating compliance, to perform more than the minimum number of sampling events.
- (3) 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.

Benchmarks for pH of 9.0 S.U., Nitrate + Nitrite-Nitrogen of 3.0 mg/L, BOD5 of 30 mg/L, COD of 120 mg/L, TSS of 100 mg/L, Oil and Grease of 30 mg/L are included, which are typical of the monitoring requirements for PAG-03 Appendices (effective 3/24/2023).

The BMPs from PAG-03 Appendix B and Appendix U are included.

The requirement to submit an Annual Report is included.

The requirement for routine inspections on a semiannual basis is included.

Antidegradation (93.4):

The applicant is not proposing a new or increased discharge to HQ or EV waters, so Module 1 (Anti Degradation Module) was not required with this application.

The effluent limits for this discharge have been developed to ensure that existing instream water uses and the level of water quality necessary to protect the existing uses are maintained and protected. Best Management Practices will ensure that the existing instream uses are protected. No Exceptional Value Waters are impacted by this discharge.

The designated use of the receiving waters are as follows:
UNT 59848 to Muddy Run (HQ-CWF, MF)

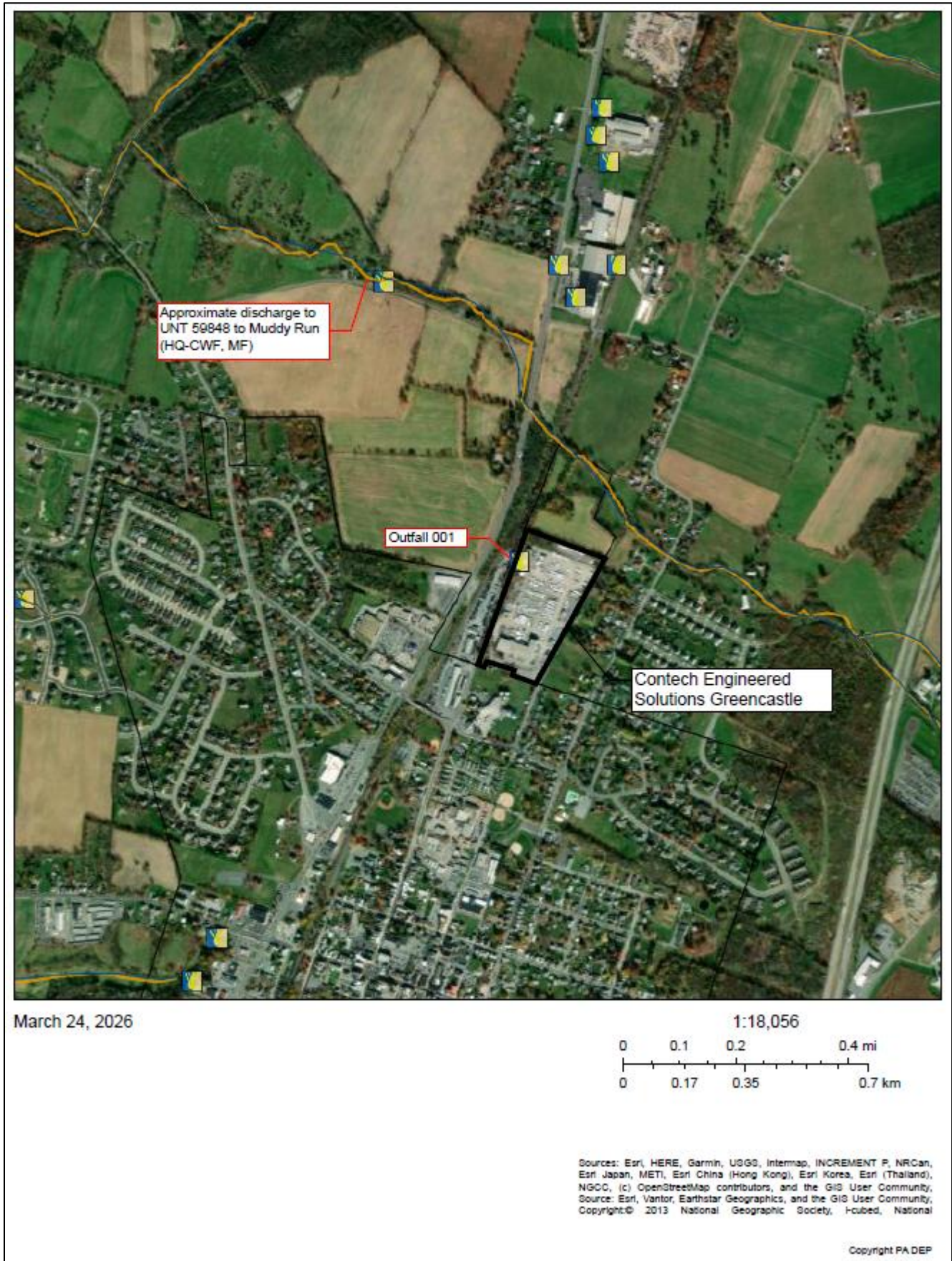


Figure 1. eMapPA Printout

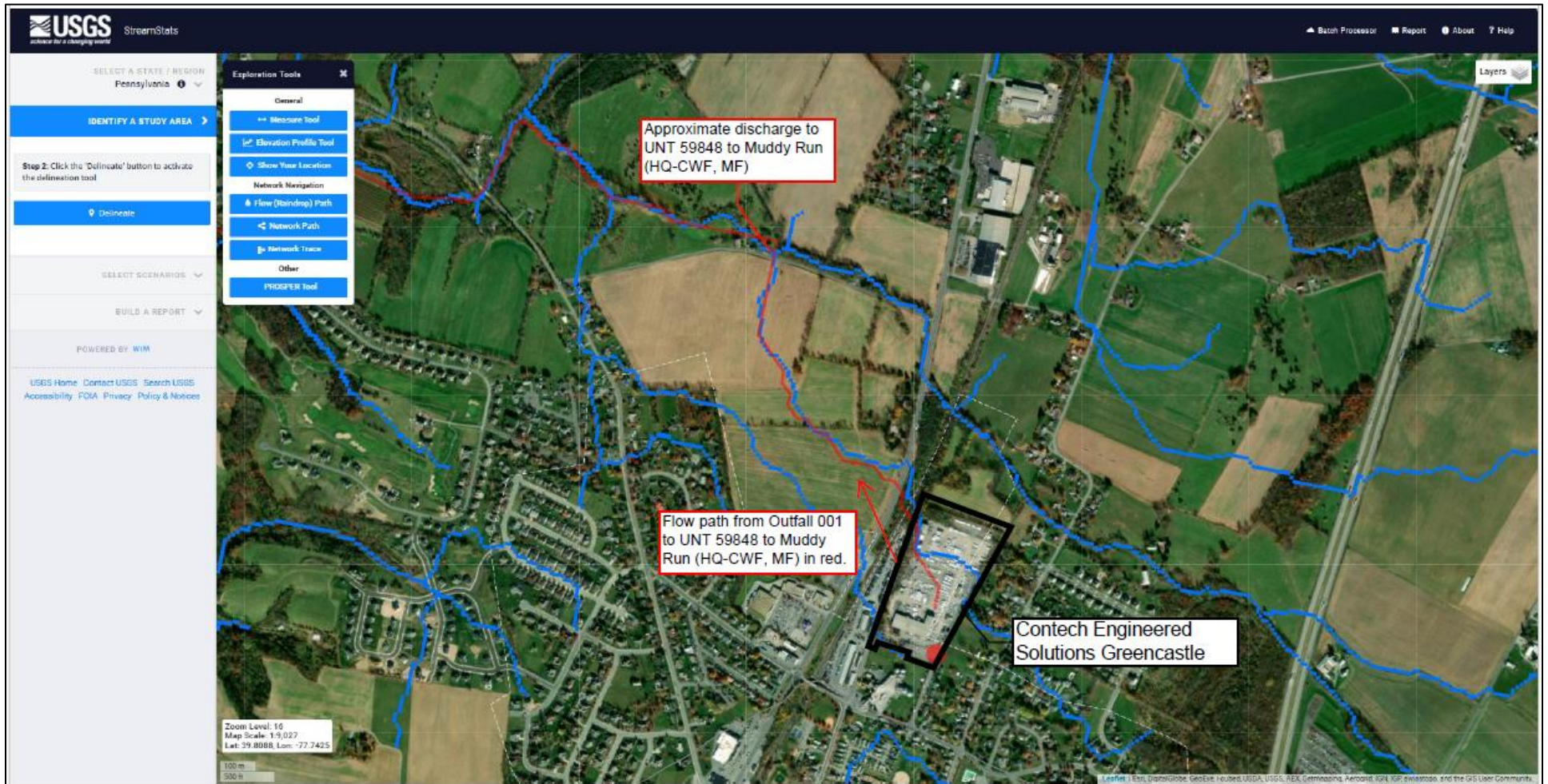


Figure 2. USGS StreamStats Flow Path

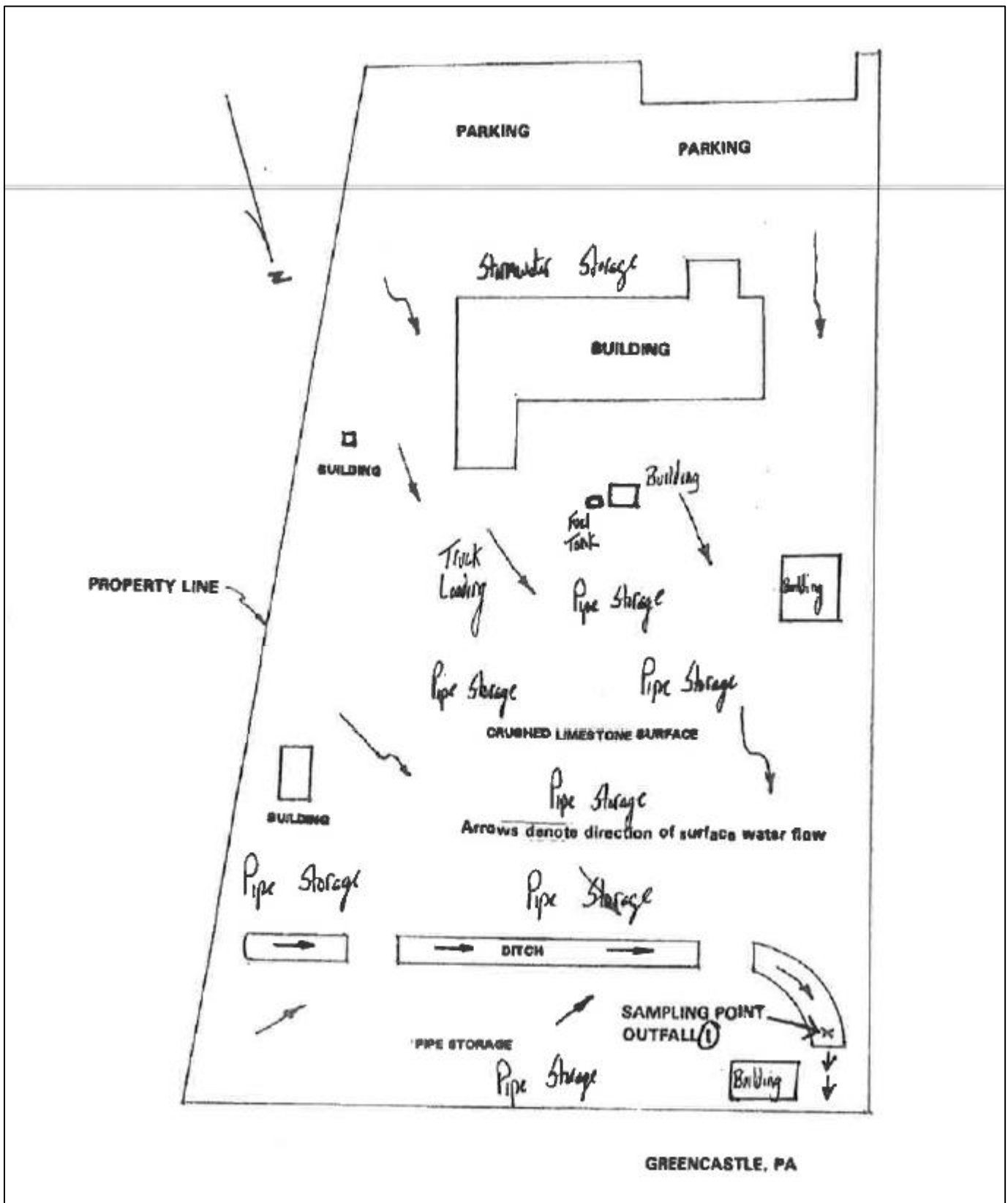


Figure 3. Site Plan

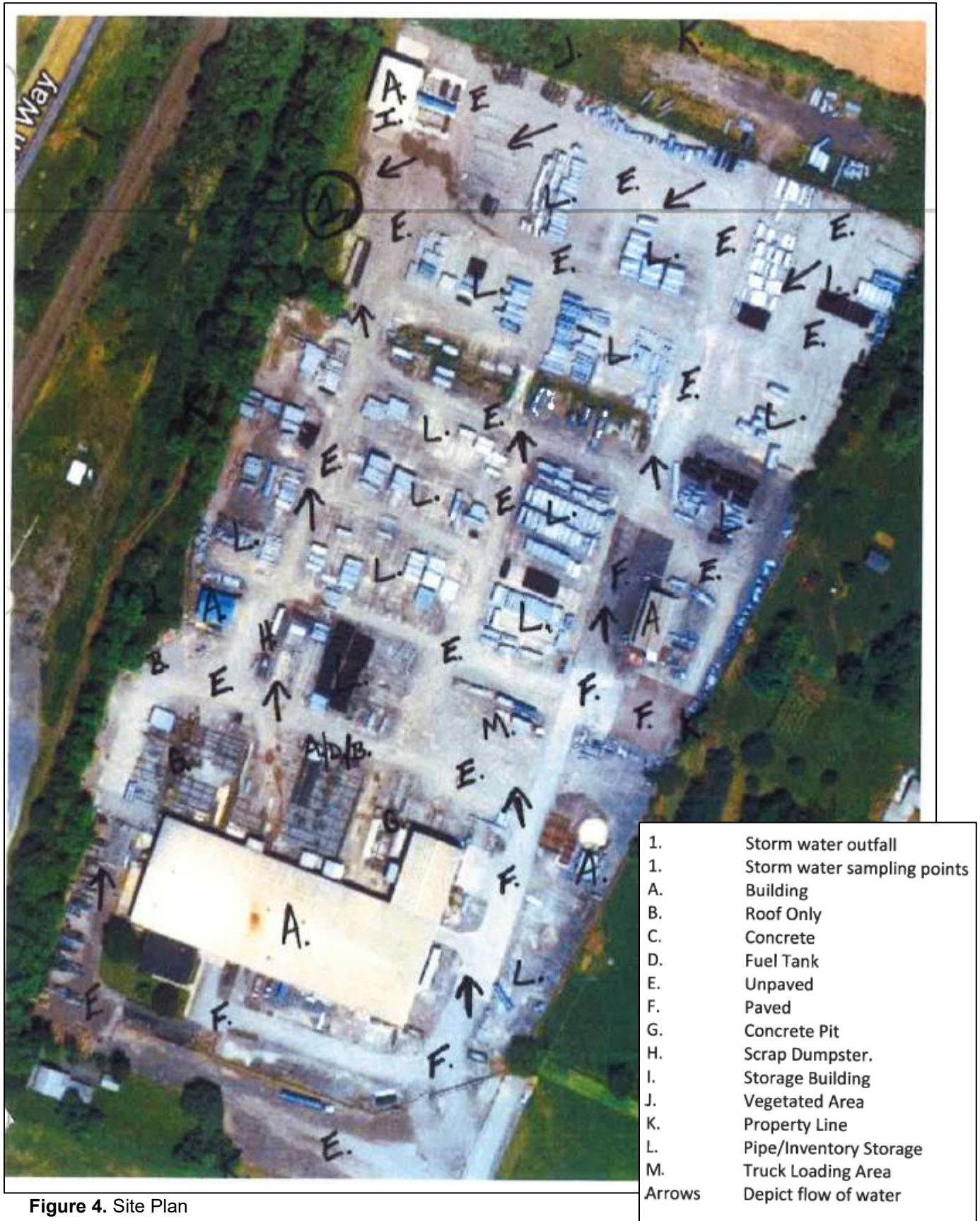
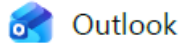


Figure 4. Site Plan

ATTACHMENT A

CORRECTIVE ACTION PLAN (CAP)



RE: [EXTERNAL] PA203504 Contech Engineered Solutions LLC - Greencastle

From Christopher Hallam <Christopher.Hallam@ContechES.com>

Date Tue 3/10/2026 10:39 AM

To Rakowsky, Jacob <jrakowsky@pa.gov>; Charles Wolfe <Charles.Wolfe@ContechES.com>

Cc Arwood, Scott <sarwood@pa.gov>; Stawiarski, Summer <sustawiars@pa.gov>; Fake, Kyle <kyfake@pa.gov>

Good morning Mr. Rakowsky,

I have created the following Corrective Action Plan for reducing my Total Suspended Solids:

- . Add grass pavers to our drainage ditch
- . Add an erosion control blanket to the drainage ditch embankment
- . Add a Stone Check Dam to our drainage ditch using large stone rip rap
- . Add smaller clean stone around outlet entrance
- . Increase monitoring to ensure erosion is controlled and water flow is slowed

Thank you,

Chris Hallam
Plant Manager

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