

Application Type Renewal
 Facility Type Stormwater
 Major / Minor Minor

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

Application No. PAS232208
 APS ID 625954
 Authorization ID 1483676

Applicant and Facility Information

| | | | |
|---------------------------|---|------------------|--|
| Applicant Name | <u>Carpenter Co.</u> | Facility Name | <u>Carpenter Co.</u> |
| Applicant Address | <u>5016 Monument Avenue</u> <u>Richmond, VA 23230-3620</u> | Facility Address | <u>57 Olin Way</u> <u>Fogelsville, PA 18051</u> |
| Applicant Contact | <u>Cliff Wilson, Vice President</u> | Facility Contact | <u>Brian Geren, Technical Director</u> |
| Applicant Phone | <u>(804) 359-0800</u> | Facility Phone | <u>(610) 366-8349</u> |
| Client ID | <u>6977</u> | Site ID | <u>240064</u> |
| SIC Code | <u>2297, 3086</u> | Municipality | <u>Upper Macungie Township</u> |
| SIC Description | <u>Manufacturing - Nonwoven Fabrics</u> <u>Manufacturing - Plastics, Foam Products</u> | County | <u>Lehigh</u> |
| Date Application Received | <u>April 29, 2024</u> | EPA Waived? | <u>Yes</u> |
| Date Application Accepted | <u>May 13, 2024</u> | If No, Reason | <u>-</u> |
| Purpose of Application | <u>Renewal of NPDES permit to discharge industrial stormwater.</u> | | |

Summary of Review

The applicant is requesting renewal of an existing NPDES permit to discharge stormwater associated with industrial activity to Iron Run, a HQ-CWF, MF (High Quality-Cold Water Fishes, Migratory Fishes) designated receiving stream in state water plan basin 2-C (Lower Lehigh River). As per the Department's current existing use list, the receiving stream segment does not have an existing use classification that is more protective than its designated use.

The facility contains two manufacturing facilities. The main building consists of a prime foam line, polyester fiber line, and bonded foam line. The prime foam line converts raw materials into polyurethane foam. The fiber line produces sheets of unwoven polyester fiber. Foam and fiber products are primarily used in the bedding and furniture markets. The bonded foam line grinds up recycled foam and glues it back together, primarily for carpet cushion. The second building at the facility makes expanded polystyrene blocks. The blocks are cut to customer specifications and sold primarily for insulation.

No non-stormwater discharges are anticipated during the 5 years following coverage or approval.

The facility is categorized by SIC codes 3086 (Manufacturing - Plastics, Foam Products) and 2297 (Manufacturing - Nonwoven Fabrics). The permit falls under Appendices Q and S monitoring requirements of the PAG-03 General Permit. The Department renewed the NPDES General Permit for Stormwater Discharges Associated with Industrial Activity (PAG-03) and it became effective on March 24, 2023. Therefore, the new monitoring requirements for Appendices Q and S will be utilized in this permit renewal. Semi-annual monitoring and reporting for pH, Chemical Oxygen Demand (COD), Total Suspended Solids (TSS), Total Nitrogen, Total Phosphorous, and Total Zinc are required under this permit.

Benchmark values exist for pH, TSS, and COD. A benchmark value is the concentration of a pollutant in stormwater discharges that serves as a threshold for the determination of whether existing site BMPs are effective in controlling stormwater pollution. The benchmark values can be found in Part C. III. F. of the permit. A corrective action plan must be

| Approve | Deny | Signatures | Date |
|---------|------|---|---------------|
| X | | /s/ Allison Seyfried Zukosky / Project Manager | April 4, 2025 |
| X | | /s/ Edward Dudick, P.E. / Environmental Engineer Manager | April 4, 2025 |

Summary of Review

submitted to DEP if the discharge concentration for the parameters exceed the benchmark values for two or more consecutive monitoring periods.

PPC Plan implementation and completion of an annual inspection and compliance evaluation are required under the permit.

The existing permit expired on October 31, 2024 and the application for renewal was received on time.

A Water Management System Inspection query indicated that on November 15, 2024 a Routine/Partial Inspection was performed.

There is currently one open violation for this client that may need to be resolved before issuance of the final permit:

1. 11/15/2024 - Violation ID 8211123 – Violation Code 245.21 – Failure to use a DEP-certified tank handler or inspector for tank handling or inspection activities (Program Specific ID: 39-38850).

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.

