

Application Type Renewal
Facility Type Storm Water
Major / Minor Minor

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

Application No. PAS603508
APS ID 339477
Authorization ID 1486792

Applicant and Facility Information

Applicant Name	<u>Cumberland Recycling Inc.</u>	Facility Name	<u>Cumberland Scrap Metal Recyclers</u>
Applicant Address	<u>PO Box 307</u> <u>Carlisle, PA 17013-0307</u>	Facility Address	<u>121 Stover Drive</u> <u>Carlisle, PA 17015</u>
Applicant Contact	<u>Steven Field</u>	Facility Contact	<u>Seth Heinle</u>
Applicant Phone	<u>(570) 622-6543</u>	Facility Phone	<u>(717) 243-8781</u>
Client ID	<u>148136</u>	Site ID	<u>543434</u>
SIC Code	<u>5093</u>	Municipality	<u>Middlesex Township</u>
SIC Description	<u>Wholesale Trade - Scrap And Waste Materials</u>	County	<u>Cumberland</u>
Date Application Received	<u>May 28, 2024</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>June 26, 2024</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 a NPDES individual permit for discharges of stormwater associated with industrial activity located in Middlesex Township, Cumberland County. See Figure 1 and Figure 2 for an Outfall Location Map and Site Plan.

The facility's primary SIC code is 5093 (scrap and waste materials) which requires an NPDES permit. Since the facility discharges to an HQ-CWF surface water, the facility must be covered under a NPDES Individual Permit for Discharges of Stormwater Associated with Industrial Activities. If the facility qualified for a PAG-03, they would fall under Appendix P based on their SIC Code.

Facility Description, from application: scrap metal and recycling processing, ferrous and non-ferrous.

A renewal application was received via Public Uploads Ref ID 236291 on 5/28/2024. Additional information was received via email. The application was deemed complete on 6/26/2024.

The facility has one outfall that discharges to a UNT to Letort Spring Run (HQ-CWF, MF): Outfall 001. Outfall 001 is located at the northeastern portion of the property off Stover Drive.

The applicant noted in an email that the plant is currently shuttered and there has been no activity by Cumberland Recycling Inc. since the Covid-19 pandemic.

Per the application, the PPC Plan was last reviewed in September 2016.

Part C permit conditions require semi-annual 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. There are no open violations for the client that would warrant withholding the issuance of this permit.

Approve	Deny	Signatures	Date
X		<i>Jacob S. Rakowsky</i> Jacob S. Rakowsky, E.I.T. / Project Manager	7/9/2024
X		<i>Scott M. Arwood</i> Scott M. Arwood, P.E. / Environmental Engineer Manager	7/9/2024

Summary of Review

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</u>
Latitude	<u>40° 13' 28.6"</u>	Longitude	<u>-77° 8' 8.9"</u>
Wastewater Description: <u>Stormwater associated with industrial activity.</u>			
Receiving Waters	<u>Unnamed Tributary to Letort Spring Run (HQ-CWF, MF)</u>	Stream Code	<u>10262</u>
NHD Com ID	<u>56405535</u>	RMI	<u>0.42</u>
Drainage Area	<u>1.84 sq. mi.</u>	Yield (cfs/mi ²)	<u></u>
Q ₇₋₁₀ Flow (cfs)	<u>Parameters out of StreamStats suggested range.</u>	Q ₇₋₁₀ Basis	<u>StreamStats</u>
Watershed No.	<u>7-B</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>Attaining Use(s)</u>		
Cause(s) of Impairment	<u></u>		
Source(s) of Impairment	<u></u>		
TMDL Status	<u></u>	Name	<u></u>
Nearest Downstream Public Water Supply Intake	<u>PA American Water Co West</u>		
PWS Waters	<u>Conodoguinet Creek</u>	Municipality	<u>Silver Spring Twp, Cumberland County</u>
PWS RMI	<u>19.54</u>	Distance from Outfall (mi)	<u>~14.5</u>

Changes Since Last Permit Issuance:

The application noted that a stormwater pipe and swale were constructed on the property in 2021 under PAD210049. The pipe and swale were installed in a manner that does not increase stormwater discharge from the site. The stormwater pipe and swale also collect stormwater from adjacent properties, Cumberland Steel and Ritner Steel. Outfall 001 is located downstream of the point where stormwater from the adjacent properties commingle. DEP advised the applicant via email that the facility is responsible for the sample results at Outfall 001, which may be influenced by the adjacent properties' stormwater runoff. The applicant was not aware of a different sampling location upstream that would capture stormwater solely from its facility and acknowledged that they are responsible for Outfall 001's sample results.

Drainage Area: 130,770 SF

% Impervious: 27.4 %

Description of Materials/Activities in Drainage Area Exposed to Precipitation:
 Scrap recycling storage.

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:
 Vegetated swale.

Compliance History	
Summary of DMRs:	A summary of eDMR data from 2019 through 2024 can be found in Table 1 below. The facility was not required to submit impairment sampling since the receiving water is not impaired. The discharge is not expected to cause or contribute to an impairment.
Summary of Inspections:	A compliance evaluation was conducted on 11/5/2019. No violations were noted. A routine/partial inspection was conducted on 9/30/2020. No violations were noted. An administrative/file review was conducted on 1/5/2024. A violation was noted for failure to submit NPDES renewal application at least 180 days prior to expiration or later approved date. The renewal application was received late on 5/28/2024. The client current has no open violations that should affect the issuance of the final permit.

Table 1. Outfall 001 eDMR Sampling Results from 2019 through 2024.

	2019 - 2024 eDMR Summary						Additional Renewal Application Samples			
	COD (mg/L)	TSS (mg/L)	Oil and Grease (mg/L)	Total Copper (mg/L)	Total Lead (mg/L)	Total Zinc (mg/L)	BOD5 (mg/L)	TN (mg/L)	TP (mg/L)	pH (S.U.)
2019 1st Half	28.2	43.5	5.60	10.00	10.00	10.00	-	-	-	-
2019 2nd Half	35.8	13.5	5.30	0.29	0.23	0.72	-	-	-	-
2020 1st Half	20.0	5.0	5.71	0.00850	0.00261	0.10000	-	-	-	-
2020 2nd Half	20.0	5.0	5.65	0.00721	0.00158	0.10000	-	-	-	-
2021 1st Half	20.0	5.4	5.81	0.05360	0.00727	0.10000	-	-	-	-
2021 2nd Half	108.0	74.0	5.50	0.28200	0.12500	0.82700	-	-	-	-
2022 1st Half	20.0	5.0	5.88	0.00583	0.00255	0.03940	-	-	-	-
2022 2nd Half	20.0	5.0	5.00	0.01570	0.00491	0.03980	-	-	-	-
2023 1st Half	20.0	21.2	5.90	0.02580	0.01410	0.09270	-	-	-	-
2023 2nd Half	20.0	33.6	5.95	0.44000	0.03950	0.18200	-	-	-	-
2024 1st Half	20.0	5.0	5.62	0.01230	0.00283	0.07100	6.0	0.32	0.10	6.58
Average	30.2	19.7	5.63	1.01281	0.94821	1.11563	6.0	0.32	0.10	6.58
Max	108.0	74.0	5.95	10.00	10.00	10.00	6.0	0.32	0.10	6.58
PAG03 No Exposure Conditions (</=)	30	30	5.0	None	None	None	10	2.0	1.0	6.0 to 9.0
PAG03 Benchmarks	120	100	30	None	None	None	30	None	None	9.0

Summary of eDMRs: Available eDMR data from 2019 through 2024 showed that concentrations did not exceed PAG03 benchmarks.

Based on the facility's **SIC Code of 5093**, the **applicable PAG-03** NPDES Permit for Discharges of Stormwater Associated with Industrial Activity (effective 3/24/2023) appendix is **Appendix P**, which would include the following monitoring requirements:

Table 2. PAG03, Appendix P Requirements

Parameter	Monitoring Requirements ^{(1),(2)}		Benchmark Values
	Minimum Measurement Frequency	Sample Type	
Total Nitrogen (mg/L) ⁽³⁾	1 / 6 months	Calculation	XXX
Total Phosphorus (mg/L)	1 / 6 months	Grab	XXX
Total Suspended Solids (TSS) (mg/L)	1 / 6 months	Grab	100
Oil and Grease (mg/L)	1 / 6 months	Grab	30
Chemical Oxygen Demand (mg/L)	1 / 6 months	Grab	120
Total Aluminum (mg/L)	1 / 6 months	Grab	XXX
Total Copper (mg/L)	1 / 6 months	Grab	XXX
Total Lead (mg/L)	1 / 6 months	Grab	XXX
Total Zinc (mg/L)	1 / 6 months	Grab	XXX

Footnotes

- (1) In accordance with Part C V.C, 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 may optionally perform additional sampling.
- (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.

Proposed Effluent Limitations and Monitoring Requirements

The facility was previously required to sample for COD, TSS, Oil and Grease, Total Copper, Total Lead, and Total Zinc. These parameters will be retained for the renewal, consistent with PAG03 Appendix P (effective 3/24/2023). TN and TP sampling will be added as a requirement for this permit, which is consistent with PAG03 Appendix P. Total Iron sampling will also be added as a requirement for this permit due to the presence of ferrous materials at the facility.

Table 3. Proposed Monitoring Requirements

Parameter	Effluent Limitations				Monitoring Requirements ^{(1),(2)}	
	Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
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
Total Suspended Solids (TSS) (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Chemical Oxygen Demand (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Aluminum (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Copper (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Lead (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Zinc (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab

Footnotes

- (1) In accordance with Part C V.C, 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 may optionally perform additional sampling.
- (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.

All required parameters from PAG-03 Appendix P are included in this permit.
 Benchmarks for TSS of 100 mg/L, Oil and Grease of 30 mg/L, and COD of 120 mg/L are included, which is typical of the monitoring requirements for PAG-03 Appendices (effective 3/24/2023).
 The BMPs from Appendix P 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 a High Quality (HQ) or Exceptional Value (EV) water, so Module 1 (Anti Degradation Module) was not attached to the 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:
 Unnamed Tributary to Letort Spring Run (HQ-CWF, MF)



Figure 1. Outfall Location

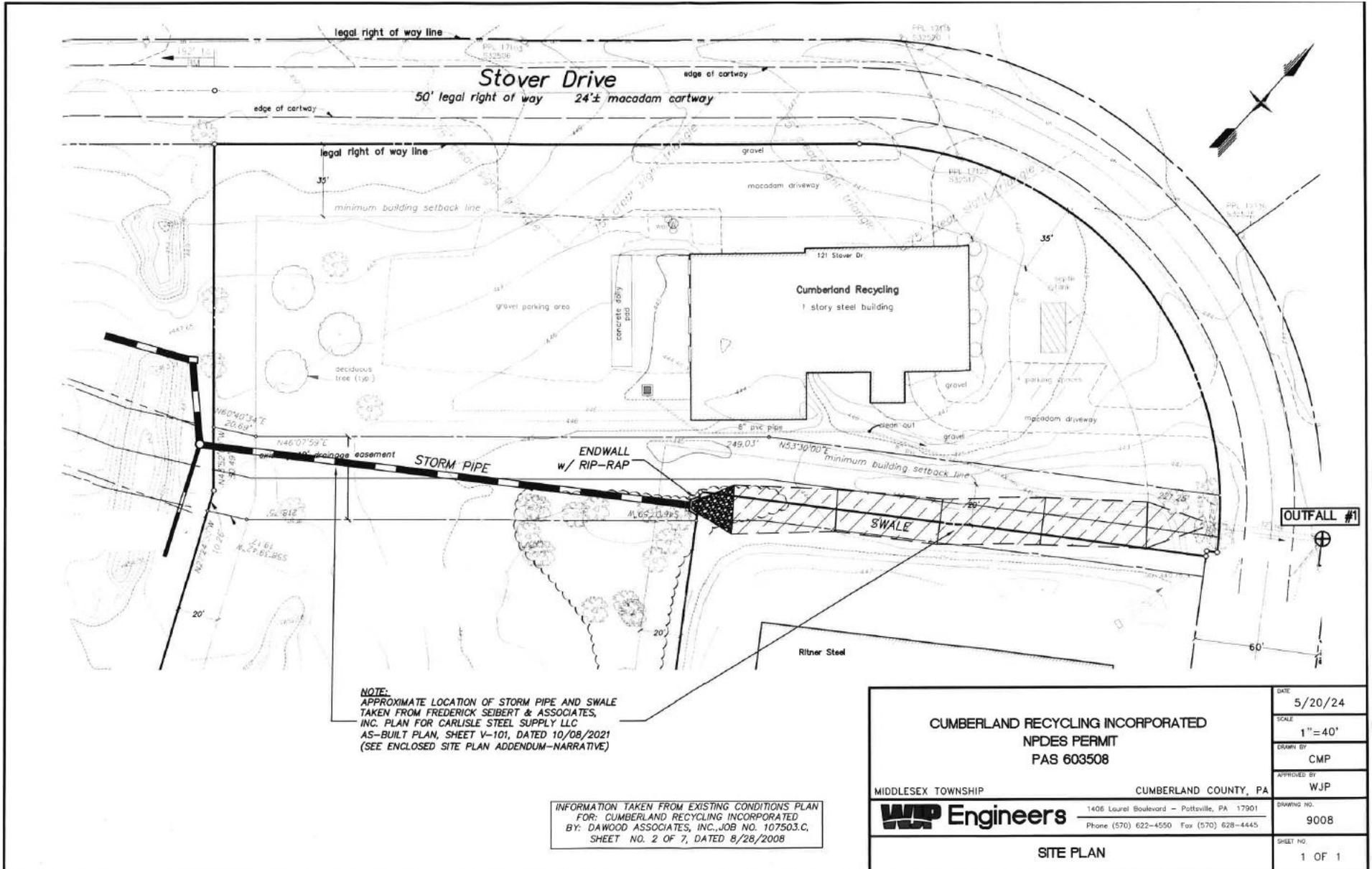


Figure 2. Site Plan