

Application Type Renewal
Facility Type Storm Water
Major / Minor Minor

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

Application No. PAS902202
APS ID 625828
Authorization ID 1466138

Applicant and Facility Information

Applicant Name	<u>Lehigh County Authority</u>	Facility Name	<u>Lehigh County Authority Pretreatment Plant</u>
Applicant Address	<u>1053 Spruce Road, PO Box 3348 Allentown, PA 18106-9408</u>	Facility Address	<u>7676 Industrial Boulevard Allentown, PA 18106-9218</u>
Applicant Contact	<u>Andrew Moore, Director of Plant Operations</u>	Facility Contact	<u>Diana Heimbach, Jacobs Project Manager</u>
Applicant Phone	<u>(610) 398-2503</u>	Facility Phone	<u>(610) 395-9782</u>
Client ID	<u>67774</u>	Site ID	<u>533857</u>
SIC Code	<u>4952</u>	Municipality	<u>Upper Macungie Township</u>
SIC Description	<u>Trans. & Utilities - Sewerage Systems</u>	County	<u>Lehigh</u>
Date Application Received	<u>December 19, 2023</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>December 27, 2023</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>Renewal of NPDES Permit for discharge of 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.

Iron Run is impaired for flow regime modification and siltation due to urban runoff/ storm sewers.

The facility is a wastewater pretreatment plant. The facility receives approximately 40-80 hauled-in truck loads per day from assorted industries. Wastewater sludges are land-applied. The pre-treated wastewater is conveyed to the Allentown Kline Island publicly owned WWTP.

The site has 10 outfalls. Outfall locations can be observed in the "Pretreatment Facility Site Catchment/Drainage Area Exhibit" plan on page 3 of this fact sheet. A description of each outfall can be observed in the table on page 25 of the draft NPDES Permit.

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

The facility is categorized by SIC code 4952 (Trans. & Utilities - Sewerage Systems) and falls under Appendix J 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 Appendix J will be utilized in this permit renewal as well as carrying over parameters that were added in previous permit renewals. Semi-annual monitoring and reporting for pH, Biochemical Oxygen Demand (BOD5),

Approve	Deny	Signatures	Date
X		Allison S. Zukosky (signed) Allison S. Zukosky / Project Manager	December 11, 2024
X		Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Acting Engineer Manager	12-12-24

Summary of Review

Chemical Oxygen Demand (COD), Total Suspended Solids (TSS), Oil & Grease, Nitrate-Nitrite as N, Total Nitrogen, Total Phosphorous, and Total Iron are required under this permit.

Benchmark values exist for pH, BOD5, COD, TSS, and Oil & Grease. 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 submitted to DEP if the discharge concentration for the parameters exceed the benchmark values for two or more consecutive monitoring periods.

Permit Requirements

Parameter	Limit (mg/l unless otherwise specified)	SBC	Model/Basis
pH	6.0 – 9.0	Inst. MIN - IMAX	Previous Permit Requirement and Appendix J
BOD5	30.0	IMAX	Previous Permit Requirement
Chemical Oxygen Demand (COD)	120.0	IMAX	Previous Permit Requirement and Appendix J
TSS	100.0	IMAX	
Oil & Grease	30.0	IMAX	
Nitrate-Nitrite as N	Report	IMAX	
Total Iron	Report	IMAX	Previous Permit Requirement.
Total Nitrogen	Report	Daily Max	
Total Phosphorus	Report	Daily Max	
			Updated Appendix J Requirement

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

The existing permit expired June 30, 2024 and the application for renewal was received on time.

A Water Management System Inspection query indicated that on April 17, 2020 a Compliance Evaluation was performed.

There are currently 10 open violations for this client that may need to be resolved before issuance of the final permit. The 3 open violations for this particular facility can be found below:

- 03/07/2022 - Violation ID 947817 – Violation Code 92A.41(B) – NPDES - Failure to orally notify DEP within 4 hours of a pollution incident or submit written report within 5 days of incident.
- 03/07/2022 - Violation ID 947822 – Violation Code 92A.41(A)4 – NPDES - NPDES - Failure to take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of a permit.
- 03/07/2022 - Violation ID 947823 – Violation Code 92A.44 – NPDES - Violation of effluent limits in Part A of 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.

