

September 18, 2018

John Goodwin
Slate Belt Heat Recovery Center LLC
435 Williams Court Suite 100
Baltimore, MD 21220-2888

Re: Draft NPDES Permit- Industrial Stormwater
Slate Belt Heat Recovery Center (SBHRC)
Application No. PA0276120
Authorization ID No. 1221963
Plainfield Township, Northampton County

Dear Mr. Goodwin:

The Department of Environmental Protection (DEP) has prepared the enclosed Draft Individual IW Stormwater NPDES permit for your review and comment.

This Draft Individual IW Stormwater NPDES Permit is for a proposed 400 TPD Biosolids processing facility located within the Grand Central Sanitary Landfill (GCSL) permit area and located adjacent to the Green Knight Economic Development Corporation (GKEDC) "Landfill Gas-to-Energy" facility. The GCSL and GKEDC facilities are also covered under the separate (but overlapping) IW NPDES Permit No. PA0070483. This Draft NPDES Permit is being issued in coordination with other DEP Program permit applications under DEP Permit Coordination.

Also enclosed is a copy of a public notice that, in accordance with DEP regulations at 25 Pa. Code § 92a.82(b), you are required to post near the entrance to your premises and, if the facility or discharge location is remote from these premises, at the entrance to the facility or at the discharge location. These postings shall remain for 30 days.

DEP will publish notice of the draft permit in the Pennsylvania Bulletin in the near future. You may provide written comments on the draft permit up to 30 days following publication of this notice. Following the 30-day public comment period (which may be extended by 15 days at DEP's discretion), DEP will consider any comments received and make a decision on whether to issue a final permit.

Please note the following:

1. Scheduled Combined Multi-Application Public Meeting/Hearing: A public hearing/meeting (Chapter 92a.82-86) has been scheduled for November 7, 2018, from 6:00 to 9:30 pm (at Wind Gap Middle School, 1620 Teels Rd, Pen Argyl, PA 18072) for this project (including this permit application and other related DEP Program permit applications) due to public request. The official Public Meeting/Hearing notices will be issued separately from this letter.

- a. Future Comment-Response Document: Written comments submitted during the public comment period (including Public Hearing/Meeting comments) will be retained by the Department and considered in making the final determination regarding this permit action. Other comments received during the comment period will be addressed and documented by the Department, and made available for public review.
 - b. Previous DEP Clean Water Program-received Public Comments: The attached Fact Sheet's communication log includes summarization and technical evaluation of previous DEP Clean Water Program-received public comments as they applied to the Individual IW Stormwater Permit Application (only). The Fact Sheet indirectly addressed public comments elsewhere (Effluent limit Antidegradation Analysis, etc.).
 - i. Plainfield Township and Penn Argyl Borough have been copied on this Draft NPDES Permit & Fact Sheet as they have provided substantial public comments regarding this permit application. Their comments incorporated other municipalities' comments by reference.
 - ii. The Delaware River Basin Commission (DRBC) and Delaware Riverkeepers Network are copied to allow for comment on the Draft NPDES permit in regard to overall watershed consideration.
 - iii. The other DEP Programs will respond to applicable public comments either separately and/or as part of the overall future Public Hearing/Meeting Comment-Response Document.
2. Permit Coordination: It is DEP's policy to coordinate multiple permits for new facilities and issue the permits simultaneously. The DEP Assistant Regional Director (Joe Buczynski) is the lead contact for permit coordination. Regarding this Draft Individual IW Stormwater NPDES Permit:
- a. Permit coordination and Permit Action: The final NPDES permit will be issued only in conjunction with other Project-related permits. If you do not obtain the required permit(s), the NPDES permit application might be denied.
 - b. Zoning and other Requirements: Nothing in this permit will supersede any other Federal, State, Interstate (DRBC) or local requirements (including zoning and/or ordinances).
 - c. Future Site Changes: This Draft NPDES Permit has been issued on your assurances that no zoning or other permitting issue will require any significant change to stormwater management at this facility. Please note that such changes might require redrafting or denial of this NPDES Permit, depending upon the nature of the change. See NPDES Permit Part A.III.C.2 (Planned Changes to Physical Facilities) notification requirements regarding future plant changes impacting stormwater management after final permit action.
 - d. Future Non-stormwater-related Requirements:
 - i. Process Wastewater/Residuals Disposal at Customer Treatment Plants: Your application mentioned your plan to dispose of site-generated

process wastewater and possibly other residuals at WWTPs that send their biosolids/sludge to your facility. Any off-spec biosolid product would also be considered a site-generated waste product due to mixing with wastes from other sources.

1. Please note each receiving Treatment Plant has existing NPDES Permit Requirements and site-specific limitations about what they can accept. Your wastewater and residuals would be considered hauled-in residual wastes.
 2. Contact Grand Central Sanitary Landfill (GCSL) directly for disposal of any solid waste material at that landfill. The GCSL Industrial Wastewater Treatment Plant cannot accept any of your wastewater without separate written Department approval.
- ii. General Permit PAG-07 (Class A Exceptional Quality Biosolids Land Application): Coverage under this General Permit will be required to allow for distribution of biosolids products (meeting its requirements) unless the (separate) Biosolids General Permit No. WMGR160 will separately cover those activities. Likewise, if the site product did not meet General Permit PAG-07 requirements, then you would need to dispose of the biosolids and/or obtain similar coverage under a different General Permit to allow for land application.
- iii. Sanitary Wastewater (from facility restrooms, showers, etc.): The Application indicates that the site-generated sanitary wastewater (no process wastewater or other wastewater type) will be directed to the Penn Argyl Municipal Authority (PAMA) Treatment Plant through a future sewer lateral. Please note that it is your responsibility to address all applicable PAMA requirements. Discharge of other wastewater types would trigger additional PAMA NPDES Permit requirements and possibly Act 537 Planning Requirements.
3. Sedimentation Basin No. 2 as a Water of the Commonwealth:
- a. Basin Classification History: Your application(s) indicated the Basin is a water of the Commonwealth that is acting as a stormwater control:
 - i. Mining Permit No. 48820501C2: The application indicated the former Doney II Quarry was closed in 2007. The December 17, 2007 PA DEP Mining Program Notice of Permit Correction stated the post-mining land use was corrected from "Water Impoundment" to "Developed Water Resource" (Chapter 77.1 "Land Use – Developed Water Resource": "Land used for storing water for beneficial uses, such as stockponds, irrigation, fire protection, flood control and water supply").
 - ii. MSW Landfill Permit No. 100265: The application(s) indicated the Basin was converted into a "sediment basin and stormwater control facility" under the August 1, 2008 DEP Waste Management Program

MSW Landfill Permit Amendment for Grand Central Sanitary Landfill (GCSL). The quarry was partially filled in and an emergency spillway provided. The Basin discharge barrel (discharging to the UNT to Little Bushkill Creek watershed) was permitted but not installed per your application. GCSL Sediment Trap No. 2 (upslope of Basin No. 2) was also provided to remove landfill cover area sediment prior to reaching the Basin. GCSL separately submitted a MSW Landfill permit amendment application involving modifying the Basin and proposed SBHRC area for this project. The modifications will decrease overall Basin storage/infiltration capacity and relocate the emergency spillway which will now discharge to Waltz Creek. The application indicated the landfill disposal drainage area is capped and revegetated at final grades, hence with little potential for erosion, sedimentation or leachate seeps.

- iii. GCSL NPDES Permit No. PA0074083: This Basin/stormwater drainage area was subsequently included in the GCSL NPDES Permit No. PA0074083 with GCSL Stormwater Outfall No. 012 at the approved but not constructed Basin No. 2 discharge barrel (discharge to the GCSL stormwater control draining to the UNT to Little Bushkill Creek). The stormwater drainage area included the onsite GKEDC LFG-to-Energy Facility (GKEDC). GCSL Stormwater Outfall No. 012 was subsequently removed from the NPDES Permit due to lack of discharge. The GCSL NPDES Permit has not been updated to reflect site changes discussed in the SBHRC Application for Individual IW Stormwater NPDES permit.
- b. Protection of the Waters of the Commonwealth: As a water of the Commonwealth, the Basin is subject to all permitting/regulatory protections as a water of the Commonwealth.
 - i. Standard of Protection (Cold Water Fishery): This application described the Basin as a “non-discharging, engineered, permitted, stormwater control basin”. The application noted the (regraded) Basin would contain a 100-year storm event or 200-year storm event without discharging via the emergency spillway following construction of the SBRHC facility/Basin modification. However, the (regraded) Basin would discharge to Waltz Creek via the relocated emergency spillway during unusual weather events. It is therefore considered part of the Waltz Creek Watershed (after modification under the GCSL minor modification), and will become subject to the same standard of protection as Waltz Creek. Waltz Creek is a Cold Water Fishery (CWF), subject to the August 9, 2004 Waltz Creek TMDL (Metals and Sediment), and impaired due to impairment sources/causes including siltation and urban runoff/storm sewers.

- ii. Additional Permit Requirement: Discharges to the Basin are subject to the existing GCSL NPDES Permit No. PA0074083 requirements, including the Part A.I Additional Requirements (narrative Technology-Based Effluent Limits). This Draft NPDES Permit also contains these requirements. See below for details.
- iii. Reuse/Recycling of Basin No. 2 Water: The Department would allow the facility to use Basin water for dust control, fire-fighting water source, and other incidental outside usage within the Waltz Creek watershed (now including the Basin No. 2 drainage area after basin/site regrading). Discharge to the UNT to Little Bushkill Creek (HQ-CWF) watershed (Drainage Area 6) would require notification/authorization due to the HQ nature of the receiving watershed and uncertainties about potential Basin water quality. Other Plant usages would be subject to the requirements of the proposed non-potable water usage and proper management of the resulting wastewater.
- iv. Overlapping NPDES Permit Protections: The Basin will be receiving stormwater from multiple facilities. The Application(s) indicated the Basin and GCSL Sediment Trap No. 2 will be located in the SBHRC property parcel, but still within the GCSL permit area(s).
 - 1. GCSL Obligations: GCSL has already addressed stormwater requirements for the GCSL landfill and Green Knight facility under NPDES Permit No. PA0074083. Requirements include site-wide implementation of NPDES Permit-listed stormwater BMPs, site-wide PPC Plan requirements (especially NPDES stormwater-related requirements), site-wide stormwater inspection/certification requirements, etc.
 - a. GCSL Landfill Drainage Area: The landfill disposal area has vegetated final cover and existing Sediment Trap No. 2 which minimizes any potential erosion & sedimentation and/or leachate seeps from reaching the Basin. The other GCSL landfill areas (access roads, scales, drainage area to the west of Green Knight facility, etc.) are also subject to NPDES permit requirements.
 - b. GKEDC Drainage Area: GCSL chose to incorporate the Green Knight Facility into its NPDES permit, and is therefore responsible for ensuring the GKEDC Facility complies with all NPDES permit requirements including: Stormwater Best Management Practices (BMPs), site-wide PPC Plan Requirements (especially the NPDES stormwater PPC plan requirements), Stormwater Inspection/certification requirements, etc.

- c. Other GCSL Responsibilities: The SBHRC Facility will be located on a separate parcel leased from GCSL within the landfill permit boundary. GCSL retains all property owner liabilities and responsibilities. Nothing in this permit will supersede any separate requirements of the other GCSL permits/authorizations and/or local requirements.
 2. SBHRC Obligations: SBHRC is responsible for any pollutant being discharged to the waters of the Commonwealth via your facility's outfalls/drainage areas to the Basin, Waltz Creek watershed (CWF) and/or the Unnamed Tributary (UNT) to Little Bushkill Creek (HQ-CWF).
 - a. This NPDES Permit includes additional stormwater outfalls and identified drainage areas to help determine whether the source/cause of any future pollution incident is on or off your facility area.
 - b. The Department recommends that SBHRC record and document any SBHRC determination whether any future pollution event or noncompliance event originated outside of the SBHRC operations.
 - c. The Department has compliance discretion if there is clear evidence that the cause/source of a pollution event is outside the SBHRC facility area.
4. Outfalls and Drainage Areas: The Department has incorporated the following Outfalls/Drainage Areas into this permit.
 - a. Outfall No. 001: This outfall receives stormwater drainage from the SBHRC building and material handling areas, plus drainage from a portion of the GKEDC drainage area being directed into the common stormwater piping upslope of Outfall No. 001.
 - b. Outfall No. 002: This outfall is the emergency spillway discharge point for Basin No. 2. The Department will require grab sampling in event that there is a discharge to Waltz Creek via the Spillway (unless prohibited by safety considerations during extreme weather events).
 - c. Outfall No. 003 (stormwater run-on): This is the GKEDC stormwater pipe inlet upgradient of Outfall No. 001. This Outfall will allow for determination if there is any GKEDC contribution to the Outfall No. 001 discharge.
 - d. Outfall No. 004 (stormwater run-on): This is the GCSL Sediment Trap No. 2 discharge to Basin No. 2. This Outfall will allow for determination if there is any closed landfill cap drainage area contribution to any impact on Basin No. 2.
 - e. Drainage Area No. 005: This is the western drainage area receiving stormwater drainage from the SBHRC truck maneuvering area, SBHRC

- Process Wastewater Tank area, SBHRC parking lot, and any stormwater run-off from the GKEDC/GCSL drainage areas. The GCSL application Figure 1 (Stormwater Management Plan Proposed Drainage Areas) indicated that this is a 10.25-acre overall drainage area minus the NPDES permit application-defined drainage areas for SBHRC and the Basin itself. You have indicated this is a stormwater sheet flow area without a point of concentrated flow to allow for stormwater monitoring. You have indicated there will be no overnight storage of waste-filled or product-filled trucks onsite.
- i. You must implement the SBHRC Stormwater BMPs, the SBHRC PPC Plan, SBHRC stormwater inspection/certification requirements in this sheet flow area. Likewise, GCSL is required to implement its similar NPDES permit requirements for the overlapping GCSL/GKEDC facility area(s).
 - ii. The Department reserves the right to require stormwater sheet flow sampling for this area. See standard NPDES Permit Stormwater Monitoring requirements (Part C.V.B).
- f. Drainage Area No. 006: This is the northern drainage area between SBHRC building and access roads and the GCSL Internal Access Road. This area drains to the UNT to Little Bushkill Creek. You have indicated that no industrial activity/material handling takes place in this area, but it might receive roof-top drainage, airborne dust, and/or potential releases from access road traffic.
- i. You must implement the SBHRC Stormwater BMPs, the SBHRC PPC Plan, and SBHRC stormwater inspection/certification requirements in this sheet flow area. Likewise, GCSL is required to implement its similar NPDES permit requirements for the GKEDC facility area (between the GKEDC building and GCSL access roads).
 - ii. Please note that any building roof drainage or other site drainage may not contain prohibited non-stormwater drainage (see NPDES Part C.I.B). The Department recommends that the building roof-top drainage be directed to the Basin No. 2 side (due to HQ receiving stream watershed on other side).
 - iii. The Department reserves the right to require stormwater sampling for this area.
- g. Drainage Area No. 007: This is the eastern portion of the SBHRC facility (including entrance and access roads) that drains to the GCSL stormwater controls and eventually to Waltz Creek. Other than incoming/outgoing traffic, you have indicated no material handling/industrial activities will take place in this area, but it will receive airborne dust, potential vehicular releases, etc.
- i. You must implement the SBHRC Stormwater BMPs, the SBHRC PPC Plan, SBHRC stormwater inspection/certification requirements in this sheet flow area. Likewise, GCSL is required to implement its similar

- NPDES permit requirements for the GCSL access roads (outside of the SBHRC facility area).
- ii. The Department reserves the right to require stormwater sampling for this area.
5. Permit Limits and Monitoring Requirements: Your application did not propose any constituents as indicator chemicals (for stormwater contamination), did not provide any stormwater data from a similar facility, and did not provide any technical evaluation of existing area GCSL stormwater discharges or existing Basin water quality. Your application mentioned your plan to conduct pre-operation stormwater sampling and analysis, but post-permitting stormwater sampling results cannot be used for initial permitting purposes. The Department has determined the following requirements are required due to site-specific conditions at this time. The Department will re-evaluate monitoring requirements in the next NPDES Permit Renewal:
- a. Biosolids Indicator Constituents: These requirements pertain to all SBHRC outfalls & drainage areas:
 - i. BOD5: 30.0 mg/l IMAX permit limit
 - ii. Total Suspended Solids (TSS): 100.0 mg/l IMAX permit limit
 - iii. Total Dissolved Solids (TDS): Monitoring & Reporting
 - iv. Ammonia-N: Monitoring & Reporting
 - v. Nitrate-N: Monitoring & Reporting
 - vi. Total Phosphorus: Monitoring & Reporting
 - b. Waltz Creek TMDL Metals (Copper, Lead, Zinc): The Department will be evaluating future stormwater data to determine if permit limits are required to protect the waters of the Commonwealth and/or as required by any future Waltz Creek TMDL update. Outfall No. 006 will be monitored for informational purposes.
 - c. GKEDC Contribution to Stormwater Drainage Areas (Outfalls Nos. 001, 003 and Drainage Area 005): Where GKEDC drainage contributes to the stormwater outfall/drainage area, additional SIC Code 4911 permit limits/monitoring requirements will pertain:
 - i. Oil & Grease: 30.0 mg/l IMAX. This limit applies to all SBHRC areas due to potential vehicular/piping releases and proposed site usage of GKEDC oils.
 - ii. Total Iron: Monitoring & Reporting
 - iii. pH: 6.0 SU Instantaneous Minimum and 9.0 SU IMAX
 - iv. Outfall No. 003: As this outfall reports only stormwater run-on from the GKEDC area, no permit limits have been imposed.
 - d. GCSL Contribution to Stormwater Drainage Areas (Outfalls 002, 004; Drainage Areas 005, 006, and 007): The GCSL drainage areas contribute stormwater drainage to these Outfall/drainage areas.
 - i. Outfalls Nos. 002, 004, and Drainage Area 005: Where GCSL Landfill disposal area contributes to the stormwater outfall/drainage area, the

existing GCSL NPDES Permit No. PA0070483 permit limits/monitoring requirements also pertain. Existing GCSL monitoring parameters (or equivalent) is being added including: pH, Arsenic, Barium, Cadmium, Chromium, Cyanide, Iron, Lead, Magnesium, Mercury, Selenium, Silver and Total Organic Carbon (TOC).

- ii. SBHRC Drainage Areas 006 and 007: These areas are potentially subject to GCSL contributions from access roads, but in the absence of GCSL disposal area drainage contribution (and/or other GCSL industrial area/material handling area) will only be monitored upon Department request for SBHRC parameters. The SBHRC parameters would act as indicators of any truck spill or leakage in those areas. The facility is not storing waste-filled or product filled trucks onsite. During normal business days, the SBHRC and GCSL personnel would respond to any truck release onsite.
- iii. Outfall No. 004: As this outfall reports only stormwater run-on from the GCSL Sediment Trap 2, no permit limits have been imposed

6. Site-specific Permit Conditions:

- a. Part C.VI.C (Process Wastewater Tank Release of Collected Precipitation): You have requested authorization to discharge “uncontaminated” collected precipitation from the Process Wastewater Tank’s secondary containment to the Basin No. 2 drainage area. You proposed to verify lack of contamination by a visual inspection (pass/fail criteria not identified but presumed to include lack of clarity/discoloration in addition to an oil sheen that was noted to be removable via “pads”), field pH within the range of 6.0 – 9.0 SU, and field specific conductivity of <2000 umhos “consistent with industry standard practices”. However, you provided no documentation/source for these practices, no technical justification, and no data from any existing biosolids facility.
 - i. The site Standard Operating Procedure must be submitted and approved (in writing) by the Department for this evaluation and oil sheen removal method prior to any such discharge. The method to prevent any discharge-caused erosion & sedimentation must be specified.
 - ii. The Department might not authorize the discharge of collected precipitation with a field conductivity of >315 umhos.
 1. Specific conductivity (field conductivity) is a widely used method of measuring the levels of salts and (correlated) Total Dissolved Solids (TDS) in streams. Pristine rainfall would have a field conductivity in the single digits (being almost equivalent to distilled water). Higher field conductivity would be a measure of contaminants such as salts or metals present.

2. The Waltz Creek TMDL ambient sampling data had an average of ~315 umhos at the headwaters sampling location (Station 1) on the West Branch of Waltz Creek. This is within the general range expected in streams within limestone or shale-rich areas. Therefore, the burden falls on you to show that a higher field conductivity level is protective of the waters of the Commonwealth.
- b. Part C.VI.D (Additional PPC Plan Requirements):
- i. Fire Safety Planning: Due to the proposed renewable fuel product onsite (presumed to be combustible) and potential fire-fighting water releases to the waters of the Commonwealth, the Department will require the PPC Plan incorporate contingency measures/planning in event of an onsite fire in the building, product storage areas, and/or in an onsite product-containing truck. The plan must address measures to allow for use of Basin No. 2 water for fire-fighting purposes onsite. The planning must include measures to ensure the fire-fighting water flows are directed away from the UNT to Little Bushkill Creek HQ watershed. The PPC Plan-identified fire-fighting methods and resources must be coordinated with both GCSL and GKEDC, including any provisions to allow for use of offsite GCSL/GKEDC equipment and/or Basin No. 2 water for fire-fighting purposes.
 - ii. Truck Release Scenario: The SBHRC PPC Plan shall be updated to address truck spill/release contingency planning within the SBHRC site prior to acceptance of biosolids onsite. GCSL remains responsible for any truck spill, leak, or other release on the GCSL access roads and GKEDC facility area.
 - iii. Recordkeeping: All pollution incident events, stormwater inspection report(s) and SBHRC determinations (regarding specific events) will be incorporated in the PPC Plan Pollution Incident Reporting Section and Inspection Report/Noncompliance Report Form copy maintained with the onsite PPC Plan copy.
7. Standard Permit Conditions: The Department wishes to draw your attention to the following standard NPDES Permit conditions:
- a. Part A.I Additional Requirements Items 1 – 4: As noted above, the Basin is classified as a water of the Commonwealth, subject to all permitting/regulatory protections, including these narrative Technology-Based Effluent Limits (TBELs). The Basin should not be receiving any significant erosion & sedimentation or other pollutant loadings from the co-located facilities under NPDES Permit requirements (closed revegetated capped landfill areas with prior Sediment Trap; limited potential exposure from existing/proposed enclosed material handling areas; areas with implemented stormwater BMPs/PPC Plan).

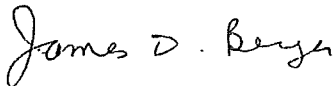
- b. Part A.III.A.4: “Test procedures (methods) for the analysis of pollutants or pollutant parameters shall be sufficiently sensitive.” Per the EPA Sufficiently Sensitive Rule, an insensitive non-detect concentration level (above the DEP Target Quantitation Limit) must be treated as that constituent being present at the insensitive non-detect level. Therefore, the Department recommends all application and compliance/DMR-reporting sampling & analysis meet the DEP Target Quantitation Limits (QLs). The existing DEP Target QLs can be found in the DEP IW NPDES Permit Application Instructions.
- c. Part A.III.B.7: “If the permittee monitors any pollutant at monitoring points as designated by this permit, using analytical methods described in Part A III.A.4. herein, more frequently than the permit requires, the results of this monitoring shall be incorporated, as appropriate, into the calculations used to report self-monitoring data on the DMR.”
- d. Part A.III.C.1: “Annual Report – The permittee shall submit a complete Annual Report to the DEP office that issued the permit by May 1 each year using DEP’s Annual Report template, attached to this permit. The Annual Report shall address activities under the permit for the previous calendar year. The permittee shall submit the Annual Report electronically if notified by DEP in writing. If the permittee discharges to a municipal separate storm sewer system (MS4), a copy of the Annual Report shall be submitted to the operator of the MS4.” Please note Plainfield Township has a MS4 NPDES Permit No. PAI132220.
- e. Part A.III.C.2: The “Planned Changes to Physical Facilities” conditions require Department notification prior to making the change. The Department will review the notification information to determine if any additional permitting requirements pertain.
- f. Part A.III.C.3: The “Unanticipated Noncompliance or Potential Pollution Reporting” conditions apply to any facility-wide noncompliance or potential pollution event. This includes noncompliance with Part A.I Additional Requirements for narrative Technology-Based Effluent Limits.
- g. Part B.I.D: The “Proper Operation and Maintenance” condition applies to structural stormwater controls including the vegetated berm, etc. Part C.II.C incorporates post-construction controls by reference.
- h. Part C.II: The “Best Management Practices (BMPs)” must be implemented and maintained on the site. The Department recommends that you verify that the proposed site will be compliant with all listed requirements (including maintaining any post-construction stormwater controls).
- i. Part C.III: The “Routine Inspections” requirements are the minimum requirements. The Department recommends that you verify the facility will be compliant with all permit condition requirements.
- j. Part C.IV: The “Preparedness, Prevention, and Contingency (PPC) Plan” requirements represent the minimum requirements. The Department recommends that you verify the facility will be compliant with all permit

condition requirements prior to facility start-up. See additional Part C.VI.D PPC Plan requirements.

- k. Part C.V: The “Stormwater Monitoring Requirements” represents the minimum requirements. In addition, the Part C.V.B language applies to the Drainage Areas 005 through 007 (including sheet flow areas): “The permittee shall, upon written notice from DEP, install inlets, pipes, and/or other structures or devices that are considered necessary in order to conduct representative stormwater sampling, in accordance with a schedule provided by DEP.” Please note the USEPA has technical guidance on how to sample sheet flow stormwater on its website.
8. DMR and Supplemental Forms: The draft permit contains a number of reporting requirements, including the submission of Discharge Monitoring Reports (DMRs) and Supplemental Forms. These templates are not attached to the draft permit. DMR(s) will be issued with the final permit and will include all monitoring requirements in Part A of the permit. DEP’s standard Supplemental Forms are available on DEP’s website (visit www.dep.state.pa.us/edmr and select “Supplemental Forms”). A checklist will be prepared for the final permit as an inventory of the Forms that will need to be submitted as attachments to the DMR.

If you have any questions regarding this permit, please contact me at 570.826.2308. If you have questions regarding permit coordination and the future combined Public Hearing/Meeting, please contact the Assistant Regional Director (Joe Buczynski) via 570-826-2511. Contact the DEP Waste Management Program (via 570-826-2511) directly if you have any questions regarding Basin classification, earth disturbance requirements, and/or construction stormwater requirements.

Sincerely,



James D. Berger, P.E.
Environmental Engineer
Clean Water Program

Enclosures

Mr. John Goodwin

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September 18, 2018

cc: Delaware River Basin Commission (DRBC)
EarthRes Group Inc.
Grand Central Sanitary Landfill
Plainfield Township
Penn Argyl Borough
Delaware Riverkeepers Network
DEP Assistant Regional Director
DEP Waste Management Program
DEP Air Quality Program
DEP CW Monitoring & Compliance Section
DEP File