pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest Regional Office
CLEAN WATER PROGRAM

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

Application Type	**Amendment, Major**	Application No.	**PA0002437 A-1**
Facility Type	**Industrial**	APS ID	**1024686**
Major / Minor	**Major>Minor**	Authorization ID	**1340316**

Applicant and Facility Information

Applicant Name	**Lindy Paving Inc.**	Facility Name	**Neville Terminal - Shenango Parcel**
Applicant Address	2340 2nd Avenue	Facility Address	200 Neville Road
	Pittsburgh, PA 15219-3106		Pittsburgh, PA 15225-1620
Applicant Contact	Ryan Mitchell	Facility Contact	***same as applicant***
Applicant Phone	(412) 281-4389	Facility Phone	***same as applicant***
Client ID	27160	Site ID	260982
SIC Code	2951	Municipality	Neville Township
SIC Description	Asphalt Paving Mixtures and Blocks	County	Allegheny
Date Application Received	December 4, 2020	EPA Waived?	No
Date Application Accepted	January 25, 2021	If No, Reason	Major facility
Purpose of Application	NPDES permit amendment for approval to add salt storage with associated storm water discharges.		

Summary of Review

On April 29, 2020, on behalf of Shenango, Inc. (Shenango), CORE Environmental Services, Inc. (CORE) submitted a request to terminate NPDES Permit PA0002437 for the former Neville Coke Plant. Per the Notice of Termination (NOT), the Neville Coke Plant ceased all industrial operations and completed facility-wide decommissioning operations on November 1, 2019 and has not operated since. Remediation activities were completed, and the site was brought up to grade and capped with either soil or asphalt. One unused warehouse building and one smokestack (used for telecommunications) remain at the site.

Notwithstanding Shenango's claim in its NOT that all potential stormwater exposures were removed from the facility, the Department sent a pre-denial letter to Shenango on July 24, 2020 noting that naphthalene was still being reported at Outfall 008. The pre-denial letter requested that Shenango identify and mitigate any potential sources of naphthalene and report its findings to the Department at which time the Department would reexamine the request for termination.

Shenango withdrew its request to terminate NPDES Permit PA0002437 on July 29, 2020.

On September 16, 2020, CORE submitted an application to transfer NPDES Permit PA0002437 from Shenango to Lindy Paving Incorporated (Lindy). Lindy operates another facility on Neville Island, but it is not contiguous with the Shenango Parcel.

On November 30, 2020, on behalf of Lindy, CSC, Inc. submitted an application to amend NPDES Permit PA0002437. The Department received that application on December 4, 2020. The amendment application describes Lindy's proposed activities as follows:

> "When approved, and initially, as much as 100,000 tons of salt will be stored on an existing pad (approximately 120-feet by 375-feet; approximately 44,400 sq. feet). The area is partially walled (full wall on two sides; and partial walls on two sides). The partially walled sides have ramps allowing for truck traffic as well as loading / unloading. The bottom of the "pit" is paved with asphalt (i.e., 100% impervious). The salt pile will be covered with tarps except for adding or removing salt (10-foot sections of tarp will be added or removed as needed).

Approve	Deny	Signatures	Date
X		Ryan C. Decker, P.E. / Environmental Engineer	March 15, 2021
X		Michael E. Fifth, P.E. / Environmental Engineer Manager	March 16, 2021

Summary of Review

"If business conditions warrant, addition storage (area(s) might be used as well. Any additional salt storage will incorporate storage and loading / unloading activities on a synthetic, impermeable surface."

Outfalls 001, 007, and 008 will remain in the permit. Conditions from Appendix K (relating to Salt Storage and Distribution sites) of the Department's "PAG-03 NPDES General Permit for Discharges of Stormwater Associated with Industrial Activity" will be added to the amended permit, including requirements for Best Management Practices to minimize the potential mobilization of salt from the stockpile to waters of the Commonwealth via storm water runoff. Sampling requirements will be added/modified to require monthly sampling of total suspended solids, total dissolved solids, chloride, and pH in addition to the existing semi-annual monitoring requirements related to potential discharges of legacy contaminants from the former Neville Coke Plant.

Shenango previously operated a cooling water intake structure at the Neville Coke Plant. Outfall 003 authorized discharges of backwash water from the cooling water intake structure's intake screen. DEP understands that the intake currently is not operational and might have been demolished as part of decommissioning. Therefore, Outfall 003 and conditions relating to the intake structure will be removed from the permit.

Administrative Updates

Shenango's Neville Coke Plant was formerly identified as a "Major" facility, which means that EPA reviewed NPDES permitting actions associated with the site. This permit amendment will re-rate the site as a Minor industrial waste facility in accordance with the current site status/characteristics and EPA's "NPDES Permit Rating Work Sheet" (see attached).

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.	001	Design Flow (MGD)	Variable
Latitude	40° 29' 54.61"	Longitude	-80° 04' 29.50"
Quad Name	Pittsburgh West	Quad Code	1505
Wastewater Description:	Storm water runoff that may include runoff from a salt storage pile		
Receiving Waters	Ohio River (WWF)	Stream Code	32317
NHD Com ID	99684474	RMI	975.78
Drainage Area		Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)		Q_{7-10} Basis	
Elevation (ft)		Slope (ft/ft)	
Watershed No.	20-G	Chapter 93 Class.	WWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	Dioxins, Pathogens, Polychlorinated Biphenyls (PCBs)		
Source(s) of Impairment	Sources Unknown		
TMDL Status	Final	Name	Ohio River
Nearest Downstream Public Water Supply Intake	Moon Township Municipal Authority		
PWS Waters	Ohio River	Flow at Intake (cfs)	
PWS RMI	969.36	Distance from Outfall (mi)	6.42

Changes Since Last Permit Issuance: The Neville Coke Plant was demolished.

Other Comments:

Discharge, Receiving Waters and Water Supply Information

Outfall No.	007	Design Flow (MGD)	Variable
Latitude	40° 29' 28.63"	Longitude	-80° 04' 47.00"
Quad Name	Pittsburgh West	Quad Code	1505
Wastewater Description:	Storm water runoff that may include runoff from a salt storage pile		
Receiving Waters	Ohio River (WWF) (back channel)	Stream Code	32317
NHD Com ID	134396130	RMI	975.63
Drainage Area		Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)		Q_{7-10} Basis	
Elevation (ft)		Slope (ft/ft)	
Watershed No.	20-G	Chapter 93 Class.	WWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	Dioxins, Pathogens, PCBs		
Source(s) of Impairment	Source Unknown		
TMDL Status	Final, 04/09/2001	Name	Ohio River
Nearest Downstream Public Water Supply Intake	Moon Township Municipal Authority		
PWS Waters	Ohio River	Flow at Intake (cfs)	
PWS RMI	969.36	Distance from Outfall (mi)	6.27

Changes Since Last Permit Issuance: The Neville Coke Plant was demolished.

Other Comments:

Discharge, Receiving Waters and Water Supply Information

Outfall No.	008	Design Flow (MGD)	Variable
Latitude	40° 29' 28.04"	Longitude	-80° 04' 45.82"
Quad Name	Pittsburgh West	Quad Code	1505
Wastewater Description:	Storm water runoff that may include runoff from a salt storage pile		
Receiving Waters	Ohio River (WWF) (back channel)	Stream Code	32317
NHD Com ID	134396130	RMI	4.2700
Drainage Area		Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)		Q_{7-10} Basis	
Elevation (ft)		Slope (ft/ft)	
Watershed No.	20-G	Chapter 93 Class.	WWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	Dioxins, Pathogens, PCB		
Source(s) of Impairment	Source Unknown		
TMDL Status	Final, 04/09/2001	Name	Ohio River
Nearest Downstream Public Water Supply Intake	Moon Township Municipal Authority		
PWS Waters	Ohio River	Flow at Intake (cfs)	
PWS RMI	969.36	Distance from Outfall (mi)	6.27

Changes Since Last Permit Issuance: The Neville Coke Plant was demolished.

Other Comments:

Compliance History

DMR Data for Outfall 001 (from January 1, 2020 to December 31, 2020)

Parameter	DEC-20	NOV-20	OCT-20	SEP-20	AUG-20	JUL-20	JUN-20	MAY-20	APR-20	MAR-20	FEB-20	JAN-20
Flow (MGD) Daily Maximum	0.0072						0.02					
pH (S.U.) Maximum	7.74						7.87					
COD (mg/L) Daily Maximum	< 0.01						< 20					
TSS (mg/L) Daily Maximum	11						13.3					
Oil and Grease (mg/L) Daily Maximum	< 0.01						< 5					
Ammonia (mg/L) Daily Maximum	< 0.01						< 0.5					
Total Arsenic (mg/L) Daily Maximum	< 0.01						< 0.001					
Total Cadmium (mg/L) Daily Maximum	< 0.01						< 0.001					
Total Chromium (mg/L) Daily Maximum	< 0.01						< 0.001					
Total Copper (mg/L) Daily Maximum	< 0.01						0.001					
Total Cyanide (mg/L) Daily Maximum	0.013						< 0.01					
Total Iron (mg/L) Daily Maximum	0.321						0.50					
Total Lead (mg/L) Daily Maximum	< 0.01						0.001					
Benzo(a)Pyrene (mg/L) Daily Maximum	< 0.01						< 0.003					
Naphthalene (mg/L) Daily Maximum	< 0.01						< 0.003					
Total Phenolics (mg/L) Daily Maximum	< 0.01						0.014					

DMR Data for Outfall 007 (from January 1, 2020 to December 31, 2020)

Parameter	DEC-20	NOV-20	OCT-20	SEP-20	AUG-20	JUL-20	JUN-20	MAY-20	APR-20	MAR-20	FEB-20	JAN-20
Flow (MGD) Daily Maximum	0.17280691						0.001					
pH (S.U.) Maximum	7.81						7.93					
COD (mg/L) Daily Maximum	< 0.01						82.8					
TSS (mg/L) Daily Maximum	< 0.01						21.8					
Oil and Grease (mg/L) Daily Maximum	< 0.01						< 5					
Ammonia (mg/L) Daily Maximum	< 0.01						< 0.5					
Total Arsenic (mg/L) Daily Maximum	< 0.01						< 0.001					
Total Cadmium (mg/L) Daily Maximum	< 0.01						< 0.001					
Total Chromium (mg/L) Daily Maximum	< 0.01						0.003					
Total Copper (mg/L) Daily Maximum	0.0613						0.006					
Total Cyanide (mg/L) Daily Maximum	< 0.01						0.02					
Total Iron (mg/L) Daily Maximum	0.0927						0.89					
Total Lead (mg/L) Daily Maximum	< 0.01						0.004					
Benzo(a)Pyrene (mg/L) Daily Maximum	0.002						< 0.003					
Naphthalene (mg/L) Daily Maximum	0.015						< 0.003					
Total Phenolics (mg/L) Daily Maximum	< 0.01						< 0.01					

DMR Data for Outfall 008 (from January 1, 2020 to December 31, 2020)

Parameter	DEC-20	NOV-20	OCT-20	SEP-20	AUG-20	JUL-20	JUN-20	MAY-20	APR-20	MAR-20	FEB-20	JAN-20
Flow (MGD) Daily Maximum	0.17280 691						0.001					
pH (S.U.) Maximum	7.83						7.95					
COD (mg/L) Daily Maximum	42.9						47.2					
TSS (mg/L) Daily Maximum	10.0						19.0					
Oil and Grease (mg/L) Daily Maximum	67.4						< 5					
Ammonia (mg/L) Daily Maximum	< 0.01						< 0.5					
Total Arsenic (mg/L) Daily Maximum	< 0.01						< 0.001					
Total Cadmium (mg/L) Daily Maximum	< 0.01						< 0.001					
Total Chromium (mg/L) Daily Maximum	< 0.01						< 0.001					
Total Copper (mg/L) Daily Maximum	0.137						0.002					
Total Cyanide (mg/L) Daily Maximum	0.013						0.01					
Total Iron (mg/L) Daily Maximum	0.166						0.11					
Total Lead (mg/L) Daily Maximum	< 0.01						< 0.001					
Benzo(a)Pyrene (mg/L) Daily Maximum	0.00095						< 0.003					
Naphthalene (mg/L) Daily Maximum	0.00062						0.004					
Total Phenolics (mg/L) Daily Maximum	0.11						0.013					

Image Source and Date: Google Earth Pro; 7/8/2017. Before shutdown of DTE/Shenango, Inc.'s Neville Coke Plant.

Image Source and Date: Google Earth Pro; 9/17/2019. After demolition/decommissioning activities were substantially complete.

Development of Effluent Limitations

Outfall No.	001	**Design Flow (MGD)**	Variable
Latitude	40° 29' 52.00"	**Longitude**	-80° 04' 31.00"

Wastewater Description: Storm water runoff

001.A. Technology-Based Effluent Limitations (TBELs)

Pursuant to 25 Pa. Code § 92a.61(h) and DEP's policy for permitting storm water discharges associated with industrial activities described in Section III of DEP's "Standard Operating Procedure (SOP) for Clean Water Program – Establishing Effluent Limitations for Individual Industrial Permits", minimum monitoring requirements and BMPs described in the PAG-03 NPDES General Permit for Discharges of Stormwater Associated with Industrial Activity will be applied to the Shenango Parcel's storm water discharges. As explained in the introductory section of this Fact Sheet, Lindy plans to use the Shenango Parcel for salt storage. Appendix K of the PAG-03 applies to Existing Salt Storage and Distribution Sites. Even though the salt pile at the Shenango Parcel will be new, Appendix K states the following about new piles:

This General Permit does not cover the following discharges:

A. Discharges from new salt storage and distribution sites. New salt storage and distribution sites with large stockpiles must apply for and obtain an individual NPDES permit (or other DEP approval), whether or not such sites are co-located with other industrial activities, unless such discharges will be covered by an MS4 NPDES permit. New salt storage and distribution sites with small stockpiles are not required to seek permit coverage under an individual NPDES permit if the BMPs specified in Section IV of this appendix are implemented and maintained, unless otherwise notified by DEP in writing that permit coverage or other DEP approval is required.

The BMPs in Section IV of PAG-03, Appendix K are as follows:

IV. SECTOR-SPECIFIC BMPs

In addition to the BMPs contained in Part C II of the General Permit, the permittee shall implement, at a minimum, all of the following BMPs that are applicable to the processes in place at the facility for which coverage under this General Permit is approved. The following BMPs apply to salt stockpiles only and not stockpiles of antiskid materials (e.g., stone, sand, cinders, etc.) that may be present on-site unless DEP determines that such materials are causing or contributing to pollution, in which case the BMPs shall be implemented upon receipt of written notification from DEP in accordance with a schedule provided by DEP or an approved alternate schedule.

A. Surface and Cover.

1. The permittee shall store salt stockpiles and conduct loading/unloading activities on a synthetic, impermeable surface (i.e., $< 10^{-7}$ cm/sec).

2. If stockpiles are not covered under permanent, structural cover, stockpiles must be covered by materials including but not limited to tarpaulin, polyethylene, polyurethane, polypropylene or hypalon with sufficient strength to prevent tearing. When loading and unloading is not being done, the entire stockpile must be covered at all times.

B. Material Management.

1. Remove covering at the working face just high enough to load out the day's shipment. This will minimize moisture absorption and secure the cover if wind direction shifts toward the working face.

2. Maintain the working face perpendicular to the long axis of the pile by loading alternately left/right and right/left.

3. Avoid creating a horseshoe-shaped working face that results from removing the center of the pile and leaving extended edges or aprons.

4. Maintain adequate cover at the lower edge or toe of the working face to permit maximum possible resealing of the edge of the cover when operations are completed for the day. Take care to avoid cover damage caused by cascading salt from the upper section of the working face.

5. Establish and maintain the working face at the downwind end of the stockpile whenever operationally feasible.

6. Clean up material spills from loading/unloading areas at the end of the work day.

C. Stormwater Management

1. If stormwater collection ponds or basins are installed and utilized, such ponds shall contain a synthetic liner and be managed to limit discharges to only those times where surface water flows are elevated.

2. The permittee shall recycle collected stormwater that may have come into contact with salt materials when determined by the permittee to be feasible.

The Sector-Specific BMPs from Section IV of PAG-03, Appendix K will be included in the amended permit. Lindy also will be required to 1) maintain the impermeable pad in a condition that prevents the transfer of salt into the groundwater; 2) repair or replace damaged stockpile cover materials; and 3) remove any salt residue from uncovered areas. The Appendix K conditions listed above will be modified to include the additional requirements. Weekly visual inspections will be required to evaluate the effectiveness of the site's BMPs (refer to the "Routine Inspections" requirements in Part C.II.D of the permit).

To ensure that there is baseline consistency across the state for all salt storage facilities that discharge storm water associated with their industrial activities, the monitoring requirements of Appendix K of the PAG-03 will be imposed at the Shenango Parcel's storm water outfalls. The Appendix K monitoring requirements are shown in Table 1.

Table 1. PAG-03 Appendix K – Minimum Monitoring Requirements

Parameter	Measurement Frequency	Sample Type	Benchmark Values
pH (S.U.)	1 / 6 months	Grab	XXX
Total Suspended Solids (TSS) (mg/L)	1 / 6 months	Grab	100
Total Dissolved Solids (mg/L)	1 / 6 months	Grab	XXX
Chloride (mg/L)	1 / 6 months	Grab	2,000

The benchmark values listed in Table 1 are not effluent limitations and exceedances do not constitute permit violations. However, if the permittee's sampling demonstrates exceedances of benchmark values for two consecutive monitoring periods, the permittee must submit a corrective action plan within 90 days of the end of the monitoring period triggering the plan. That requirement and the benchmark values will be specified in a condition in Part C of the permit.

Treatment requirements for new and expanding mass loadings of Total Dissolved Solids (TDS)

Salt-bearing storm water runoff from the new salt stockpile would represent a new mass loading of TDS to the Ohio River. 25 Pa. Code § 95.10 regulates new and expanding mass loadings of TDS but exempts various types of facilities and discharge loadings. Among those exemptions is "New and expanding discharge loadings of TDS equal to or less than 5,000 pounds per day, measured as an average daily discharge over the course of a calendar year, otherwise known as the annual average daily load." The BMPs required by the amended permit should limit the discharge of salt from the site and if there are any discharges, they should be intermittent. Consequently, the site is unlikely to exceed the 5,000 pounds per day threshold and should be exempt from treatment requirements on that basis.

Nevertheless, DEP will include a benchmark of 2,000 mg/L for TDS based on the 2,000 mg/L effluent standard in § 95.10(c) for new and expanding TDS discharges—in addition to the benchmarks imposed pursuant to Appendix K of the PAG-03. As explained above, the benchmark values are not effluent limits and exceedances do not constitute permit violations but exceeding the 2,000 mg/L benchmark for TDS (or chloride) would suggest that BMPs are not functioning as designed.

Existing Monitoring Requirements

To the extent that effluent limits are necessary to ensure that storm water Best Management Practices (BMPs) are adequately implemented, DEP's Permit Writers' Manual recommends that effluent limits be developed for industrial storm water discharges based on a determination of Best Available Technology (BAT) using Best Professional Judgment (BPJ). BPJ of BAT typically involves the evaluation of end-of-pipe wastewater treatment technologies, but DEP considers the use of BMPs to be BAT for storm water outfalls unless effluent concentrations indicate that BMPs provide inadequate pollution control. Table 2 summarizes the semi-annual results reported at Outfall 001 on DMRs after the renewed permit took effect on June 1, 2017.

Table 2. DMR Results for Outfall 001 (2nd Half of 2017 through 2nd Half of 2020)

Parameter	2nd Half 2017	1st Half 2018	2nd Half 2018	1st Half 2019	2nd Half 2019	1st Half 2020	2nd Half 2020
Ammonia-Nitrogen	0.71	0.71	1.18	<0.5	<0.5	<0.5	<0.01
Arsenic, Total	0.002	<0.001	<0.001	<0.001	<0.001	<0.001	<0.01
Benzo(a)Pyrene	0.013	<0.015	<0.003	<0.003	<0.003	<0.003	<0.01
Cadmium, Total	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.01
COD	147	38.6	52.4	48.3	20.6	<20	<0.01
Chromium, Total	0.004	0.003	0.003	0.001	<0.001	<0.001	<0.01
Copper, Total	0.01	0.06	0.003	0.003	0.001	0.001	<0.01
Cyanide, Total	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	0.013
Flow	0.01152	0.02	0.02	0.03	0.002	0.02	0.0072
Iron, Total	1.15	0.28	1.03	0.69	0.34	0.5	0.321
Lead, Total	0.011	0.002	0.002	0.012	<0.001	0.001	<0.01
Naphthalene	0.015	<0.015	<0.003	0.007	<0.003	<0.003	<0.01
Oil and Grease	<5.0	26.5	<5	<5	<5	<5	<0.01
pH	7.96	7.87	7.91	7.89	7.75	7.87	7.74
Phenolics, Total	<0.01	<0.01	<0.01	<0.01	<0.01	0.014	<0.01
TSS	81	194	12	25.5	10.2	13.3	11

Some effluent concentrations exhibit a general downward trend through decommissioning (e.g., COD) while other effluent concentrations started low or not-detectable and remained low or not-detectable (e.g., cadmium). To ensure that the downward trend is maintained and/or that the potential for legacy contamination of storm water runoff is minimized, the existing semi-annual monitoring requirements will be maintained in the amended permit through at least the end of the current permit term (May 31, 2022). DEP will consider changes to the existing monitoring requirements associated with legacy contamination of storm water runoff when the permit is renewed.

001.B. Water Quality-Based Effluent Limitations (TBELs)

Generally, DEP does not develop numerical WQBELs for storm water discharges. Pursuant to 25 Pa. Code § 96.4(g), mathematical modeling used to develop WQBELs must be performed at Q_{7-10} low flow conditions. Precipitation-induced discharges generally do not occur at Q_{7-10} design conditions because the precipitation that causes a storm water discharge will increase the receiving stream's flow and that increased stream flow will provide additional assimilative capacity during a storm event.

Furthermore, at the flow rates reported by Shenango (maximum of 0.03 MGD or 0.0464 cfs), Outfall 001's storm water discharges are unlikely to impact the river. The Q_{7-10} of the Ohio River is 4,730 cfs with Outfall 001's discharges representing just 0.001% of the river's Q_{7-10} flow. Any potential impacts would be less likely during storm events when the Ohio River's flow is greater than 4,730 cfs.

Even though no mathematical modeling is performed, conditions in Part C of the permit will ensure compliance with water quality standards through a combination of best management practices including pollution prevention and exposure minimization, good housekeeping, erosion and sediment control, and spill prevention and response.

001.C. Effluent Limitations and Monitoring Requirements for Outfall 001

In accordance with 25 Pa. Code §§ 92a.12 and 92a.61, effluent limits applicable at Outfall 001 are the more stringent of TBELs, WQBELs, regulatory effluent standards, and monitoring requirements as summarized below.

Table 3. Effluent Limits and Monitoring Requirements for Outfall 001

Parameter	Mass (pounds)		Concentration (mg/L)			Basis
	Average Monthly	Daily Maximum	Average Monthly	Daily Maximum	Instant Maximum	
Flow (MGD)	—	Report	—	—	—	25 Pa. Code § 92a.61(h)
Total Suspended Solids	—	—	—	Report	—	PAG-03, Appendix K; 25 Pa. Code § 92a.61(h)
Total Dissolved Solids	—	—	—	Report	—	PAG-03, Appendix K; 25 Pa. Code § 92a.61(h)
Chloride	—	—	—	Report	—	PAG-03, Appendix K; 25 Pa. Code § 92a.61(h)

Table 3 (continued). Effluent Limits and Monitoring Requirements for Outfall 001

Parameter	Mass (pounds)		Concentration (mg/L)			Basis
	Average Monthly	Daily Maximum	Average Monthly	Daily Maximum	Instant Maximum	
Oil and Grease	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Chemical Oxygen Demand	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Ammonia-Nitrogen	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Arsenic, Total	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Cadmium, Total	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Chromium, Total	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Copper, Total	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Cyanide, Total	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Iron, Total	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Lead, Total	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Benzo(a)pyrene	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Naphthalene	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Phenols (4AAP)	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
pH	—	—	—	Report	—	PAG-03, Appendix K; 25 Pa. Code § 92a.61(h)

The parameters with monitoring requirements imposed pursuant to Appendix K of the PAG-03 will require 1/month grab sampling. Salt handling is typically seasonal and sampling 1/6 months would not be enough to ensure that BMPs are working properly. The sampling frequency and sample type for all other parameters will be 1/6 months grab samples as previously established.

Development of Effluent Limitations

Outfall Nos.	007 and 008	**Design Flow (MGD)**	Variable
Latitude	40° 29' 39.00" / 40° 29' 36.00"	**Longitude**	-80° 4' 42.00" / -80° 4' 42.00"

Wastewater Description: Storm water runoff

SWO.A. Technology-Based Effluent Limitations (TBELs)

Outfalls 007 and 008 are not close to the planned location for Lindy's salt stockpile. However, Lindy was not specific about which outfalls might discharge storm water runoff from areas exposed to the salt stockpile. Therefore, the monitoring requirements from Appendix K of the PAG-03 General Permit will be imposed at Outfall 007 and 008.

Existing Monitoring Requirements

In the Fact Sheet Addendum 3 (from 2016) for the facility's current NPDES permit, DEP stated the following:

> Based on the extensive history of industrial activity at the site, Outfalls 007 and 008 will remain in the permit despite the omission of those outfalls from the revised permit application. DEP considers it likely that storm water runoff from the site will be impacted by legacy contaminants for some time and monitoring of the site's storm water is warranted to confirm whether those impacts exist.

As explained in the introductory section of this Fact Sheet, DEP intended to deny Shenango's request to terminate the NPDES permit because naphthalene was still detected at Outfall 008. Tables 4 and 5 summarize the semi-annual results reported at Outfalls 007 and 008 on DMRs since the renewed permit took effect on June 1, 2017.

Table 4. DMR Results for Outfall 007 (2nd Half of 2017 through 2nd Half of 2020)

Parameter	2nd Half 2017	1st Half 2018	2nd Half 2018	1st Half 2019	2nd Half 2019	1st Half 2020	2nd Half 2020
Ammonia-Nitrogen	<0.5	16.23	1.53	<0.5	<0.5	<0.5	<0.01
Arsenic, Total	0.003	0.004	<0.001	0.003	<0.001	<0.001	<0.01
Benzo(a)Pyrene	0.009	0.091	<0.003	0.007	<0.003	<0.003	0.002
Cadmium, Total	<0.001	0.003	<0.001	<0.001	<0.001	<0.001	<0.01
COD	208	547	49.8	<20	123	82.8	<0.01
Chromium, Total	0.016	0.044	0.007	0.007	0.002	0.003	<0.01
Copper, Total	0.029	0.17	0.014	0.032	0.012	0.006	0.0613
Cyanide, Total	0.01	0.06	<0.01	<0.01	0.04	0.02	<0.01
Flow	0.00216	0.002	0.002	0.002	0.002	0.001	0.17280691
Iron, Total	2.02	9.51	1.04	0.4	0.84	0.89	0.0927
Lead, Total	0.031	0.2	0.01	0.013	0.07	0.004	<0.01
Naphthalene	<0.003	0.022	<0.003	0.014	<0.003	<0.003	0.015
Oil and Grease	<5.0	17.5	<5	<5	<5.0	<5	<0.01
pH	7.53	7.71	7.68	7.59	7.48	7.93	7.81
Phenolics, Total	<0.01	<0.01	<0.01	<0.01	0.029	<0.01	<0.01
TSS	91.5	685	<5	222	75.2	21.8	<0.01

Table 5. DMR Results for Outfall 008 (2nd Half of 2017 through 2nd Half of 2020)

Parameter	2nd Half 2017	1st Half 2018	2nd Half 2018	1st Half 2019	2nd Half 2019	1st Half 2020	2nd Half 2020
Ammonia-Nitrogen	<0.5	9.41	1.88	0.69	<0.5	<0.5	<0.01
Arsenic, Total	0.003	0.002	<0.001	<0.001	<0.001	<0.001	<0.01
Benzo(a)Pyrene	0.027	<0.015	<0.003	0.005	<0.003	<0.003	0.00095
Cadmium, Total	<0.001	0.001	<0.001	<0.001	<0.001	<0.001	<0.01
COD	261	284	39.4	201	67.6	47.2	42.9
Chromium, Total	0.017	0.021	0.005	<0.001	0.001	<0.001	<0.01
Copper, Total	0.044	0.1	0.006	0.012	0.003	0.002	0.137
Cyanide, Total	<0.01	0.01	<0.01	<0.01	<0.01	0.01	0.013
Flow	0.00144	0.001	0.002	0.002	0.002	0.001	0.17280691
Iron, Total	1.93	4.75	0.42	8.03	0.36	0.11	0.166
Lead, Total	0.057	0.066	0.007	0.001	0.002	<0.001	<0.01
Naphthalene	0.005	<0.015	<0.003	0.006	0.003	0.004	0.00062
Oil and Grease	<5.0	97.4	<5	<5	<5	<5	67.4
pH	7.49	7.66	7.63	7.65	7.61	7.95	7.83
Phenolics, Total	<0.01	<0.01	<0.01	<0.01	<0.01	0.013	0.11
TSS	56.8	242	9	112	28	19	10

As with Outfall 001, to ensure that the downward trend in effluent concentrations is maintained and/or that the potential for legacy contamination of storm water runoff is minimized, the existing semi-annual monitoring requirements will be maintained in the amended permit through at least the end of the current permit term (May 31, 2022). DEP will consider changes to the existing monitoring requirements associated with legacy contamination of storm water runoff when the permit is renewed.

SWO.B. Water Quality-Based Effluent Limitations (TBELs)

As explained in Section 001.B of this Fact Sheet, no mathematical modeling is performed to develop WQBELs for storm water discharges from Outfalls 007 and 008. Any impacts to the river would be negligible. Even though no mathematical modeling is performed, conditions in Part C of the permit will ensure compliance with water quality standards through a combination of best management practices including pollution prevention and exposure minimization, good housekeeping, erosion and sediment control, and spill prevention and response.

SWO.C. Effluent Limitations and Monitoring Requirements for Outfalls 007 and 008

In accordance with 25 Pa. Code §§ 92a.12 and 92a.61, effluent limits imposed at Outfalls 007 and 008 are the more stringent of TBELs, WQBELs, regulatory effluent standards, and monitoring requirements as described in Sections SWO.A and SWO.B, above. The applicable requirements are summarized below.

Table 6. Effluent limits and monitoring requirements for Outfalls 007 and 008

Parameter	Mass (pounds)		Concentration (mg/L)			Basis
	Average Monthly	Daily Maximum	Average Monthly	Daily Maximum	Instant Maximum	
Flow (MGD)	—	Report	—	—	—	25 Pa. Code § 92a.61(h)
Total Suspended Solids	—	—	—	Report	—	PAG-03, Appendix K; 25 Pa. Code § 92a.61(h)
Total Dissolved Solids	—	—	—	Report	—	PAG-03, Appendix K; 25 Pa. Code § 92a.61(h)
Chloride	—	—	—	Report	—	PAG-03, Appendix K; 25 Pa. Code § 92a.61(h)
Oil and Grease	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Chemical Oxygen Demand	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Ammonia-Nitrogen	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Arsenic, Total	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Cadmium, Total	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Chromium, Total	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Copper, Total	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Cyanide, Total	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Iron, Total	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Lead, Total	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Benzo(a)pyrene	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Naphthalene	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
Phenols (4AAP)	—	—	—	Report	—	25 Pa. Code § 92a.61(h)
pH	—	—	—	Report	—	PAG-03, Appendix K; 25 Pa. Code § 92a.61(h)

The parameters with monitoring requirements imposed pursuant to Appendix K of the PAG-03 will require 1/month grab sampling. The sampling frequency and sample type for all other parameters will be 1/6 months grab samples as previously established.

Tools and References Used to Develop Permit	
☐	WQM for Windows Model (see Attachment)
☐	Toxics Management Spreadsheet (see Attachment)
☐	TRC Model Spreadsheet (see Attachment)
☐	Temperature Model Spreadsheet (see Attachment)
☐	Water Quality Toxics Management Strategy, 361-0100-003, 4/06.
☐	Technical Guidance for the Development and Specification of Effluent Limitations, 362-0400-001, 10/97.
☐	Policy for Permitting Surface Water Diversions, 362-2000-003, 3/98.
☐	Policy for Conducting Technical Reviews of Minor NPDES Renewal Applications, 362-2000-008, 11/96.
☐	Technology-Based Control Requirements for Water Treatment Plant Wastes, 362-2183-003, 10/97.
☐	Technical Guidance for Development of NPDES Permit Requirements Steam Electric Industry, 362-2183-004, 12/97.
☐	Pennsylvania CSO Policy, 385-2000-011, 9/08.
☐	Water Quality Antidegradation Implementation Guidance, 391-0300-002, 11/03.
☐	Implementation Guidance Evaluation & Process Thermal Discharge (316(a)) Federal Water Pollution Act, 391-2000-002, 4/97.
☐	Determining Water Quality-Based Effluent Limits, 391-2000-003, 12/97.
☐	Implementation Guidance Design Conditions, 391-2000-006, 9/97.
☐	Technical Reference Guide (TRG) WQM 7.0 for Windows, Wasteload Allocation Program for Dissolved Oxygen and Ammonia Nitrogen, Version 1.0, 391-2000-007, 6/2004.
☐	Interim Method for the Sampling and Analysis of Osmotic Pressure on Streams, Brines, and Industrial Discharges, 391-2000-008, 10/1997.
☐	Implementation Guidance for Section 95.6 Management of Point Source Phosphorus Discharges to Lakes, Ponds, and Impoundments, 391-2000-010, 3/99.
☐	Technical Reference Guide (TRG) PENTOXSD for Windows, PA Single Discharge Wasteload Allocation Program for Toxics, Version 2.0, 391-2000-011, 5/2004.
☐	Implementation Guidance for Section 93.7 Ammonia Criteria, 391-2000-013, 11/97.
☐	Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers, 391-2000-014, 4/2008.
☐	Implementation Guidance Total Residual Chlorine (TRC) Regulation, 391-2000-015, 11/1994.
☐	Implementation Guidance for Temperature Criteria, 391-2000-017, 4/09.
☐	Implementation Guidance for Section 95.9 Phosphorus Discharges to Free Flowing Streams, 391-2000-018, 10/97.
☐	Implementation Guidance for Application of Section 93.5(e) for Potable Water Supply Protection Total Dissolved Solids, Nitrite-Nitrate, Non-Priority Pollutant Phenolics and Fluorides, 391-2000-019, 10/97.
☐	Field Data Collection and Evaluation Protocol for Determining Stream and Point Source Discharge Design Hardness, 391-2000-021, 3/99.
☐	Implementation Guidance for the Determination and Use of Background/Ambient Water Quality in the Determination of Wasteload Allocations and NPDES Effluent Limitations for Toxic Substances, 391-2000-022, 3/1999.
☐	Design Stream Flows, 391-2000-023, 9/98.
☐	Field Data Collection and Evaluation Protocol for Deriving Daily and Hourly Discharge Coefficients of Variation (CV) and Other Discharge Characteristics, 391-2000-024, 10/98.
☐	Evaluations of Phosphorus Discharges to Lakes, Ponds and Impoundments, 391-3200-013, 6/97.
☐	Pennsylvania's Chesapeake Bay Tributary Strategy Implementation Plan for NPDES Permitting, 4/07.
☐	SOP:
☐	Other:

NPDES Permit Rating Work Sheet

☐ Regular Addition
☐ Discretionary Addition
☐ Score change, but no status change
☑ Deletion

NPDES No.: PA0002437

Facility Name: Lindy Paving Shenango Parcel (formerly Shenango's Neville Coke Plant--now demolished)

City: Neville Township

Receiving Water: Ohio River

Reach Number: 5030101000072

Is this facility a steam electric power plant (SIC=4911) with one or more of the following characteristics?

1. Power output 500 MW or greater (not using a cooling pond/lake)
2. A nuclear power plant
3. Cooling water discharge greater than 25% of the receiving stream's 7Q10 flow rate

☐ YES; score is 600 (stop here) ☑ NO (continue)

Is this permit for a municipal separate storm sewer serving a population greater than 100,000?

☐ YES; score is 700 (stop here)
☑ NO (continue)

FACTOR 1:Toxic Pollutant Potential

PCS SIC Code: _____ Primary SIC Code: 2951

Other SIC Codes: _____ _____ _____ _____

Industrial Subcategory Code: 0 (Code 000 if no subcategory)

Determine the Toxicity potential from Appendix A. *(Be sure to use the TOTAL toxicity potential column and check one)*

	Toxicity Group	Code	Points		Toxicity Group	Code	Points		Toxicity Group	Code	Points
☑	No process waste streams	0	0	☐	3.	3	15	☐	7	7	35
☐	1.	1	5	☐	4.	4	20	☐	8.	8	40
☐	2.	2	10	☐	5.	5	25	☐	9.	9	45
				☐	6.	6	30	☐	10.	10	50

Code Number Checked: 0

Total Points Factor 1: 0

FACTOR 2: Flow/Stream Flow Volume *(Complete either Section A or Section B; check only one)*

Section A - Wastewater Flow Only Considered

Wastewater type (See Instructions)			Code	Points
Type I:	Flow < 5 MGD	☐	11	0
	Flow 5 to 10 MGD	☐	12	10
	Flow>10 to 50 MGD	☐	13	20
	Flow> 50 MGD	☐	14	30
Type II:	Flow<1 MGD	☐	21	10
	Flow 1 to 5 MGD	☐	22	20
	Flow >5 to 10 MGD	☐	23	30
	Flow>10 MGD	☐	24	50
Type III:	Flow <1 MGD	☑	31	0
	Flow 1 to 5 MGD	☐	32	10
	Flow >5 to 10 MGD	☐	33	20
	Flow >10 MGD	☐	34	30

Section B - Wastewater and Stream Flow Considered

Wastewater type (See Instructions)	Percent of Instream Wastewater Concentration at Receiving Stream Low Flow		Code	Points
Type I/III:	<10%	☐	41	0
	≥10% to <50%	☐	42	10
	≥50%	☐	43	20
Type II	<10%	☐	51	0
	≥10% to <50%	☐	52	20
	≥50%	☐	53	30

Code Checked from Section A or B: 31

Total Points Factor 2: 0

1

NPDES Permit Rating Work Sheet

FACTOR 3: Conventional Pollutants

NPDES No.: PA0002437

(only when limited by the permit)

A. Oxygen Demanding Pollutants (check one) ☐ BOD ☐ COD ☐ OTHER:

Permit Limits (check one)		Code	Points
☐	<100 lbs/day	1	0
☐	100 to 1000 lbs/day	2	5
☐	>1000 to 3000 lbs/day	3	15
☐	>3000 lbs/day	4	20

Code Checked:
Points Scored: 0

B. Total Suspended Solids (TSS)

Permit Limits (check one)		Code	Points
☐	<100 lbs/day	1	0
☐	100 to 1000 lbs/day	2	5
☐	>1000 to 5000 lbs/day	3	15
☐	>5000 lbs/day	4	20

Code Checked:
Points Scored: 0

C. Nitrogen Pollutants (check one) ☐ Ammonia ☐ OTHER:

Permit Limits (check one)	Nitrogen Equivalent	Code	Points
☐	<300 lbs/day	1	0
☐	300 to 1000 lbs/day	2	5
☐	>1000 to 3000 lbs/day	3	15
☐	>3000 lbs/day	4	20

Code Checked:
Points Scored: 0

Total Points Factor 3: 0

FACTOR 4: Public Health Impact

Is there a public drinking water supply located within 50 miles downstream of the effluent discharge (this includes any body of water to which the receiving water is a tributary)? A public drinking water supply may include infiltration galleries, or other methods of conveyance that ultimately get water from the above referenced supply.

☑ YES (if yes, check toxicity potential number below)

☐ NO (if no, go to Factor 5)

Determine the human health toxicity potential from Appendix A. Use the same SIC Code and subcategory reference as in Factor 1. (Be sure to use the human health toxicity group column and ***check one below****)*

Toxicity Group	Code	Points	Toxicity Group	Code	Points	Toxicity Group	Code	Points
☐ No process waste streams	0	0	☐ 3.	3	0	☐ 7.	7	15
☐ 1.	1	0	☐ 4.	4	0	☑ 8.	8	20
☐ 2.	2	0	☐ 5.	5	5	☐ 9.	9	25
			☐ 6.	6	10	☐ 10.	10	30

Code Number Checked: 8

Total Points Factor 4: 20

NPDES Permit Rating Work Sheet

FACTOR 5: Water Quality Factors

NPDES No.: PA0002437

A. Is (or will) one or more of the effluent discharge limits based on water quality factors of the receiving stream (rather than technology-based federal effluent guidelines, or technology-based state effluent guidelines), or has a wasteload allocation been assigned to the discharge?

	Code	Points
☐ YES	1	10
☑ NO	2	0

B. Is the receiving water in compliance with applicable water quality standards for pollutants that are water quality limited in the permit?

	Code	Points
☑ YES	1	0
☐ NO	2	5

C. Does the effluent discharged from this facility exhibit the reasonable potential to violate water quality standards due to whole effluent toxicity?

	Code	Points
☐ YES	1	10
☑ NO	2	0

Code Number Checked: *A.* 2 *B.* 1 *C.* 2

Total Points Factor 5 *A.* 0 +*B.* 0 +*C.* 0 = 0

FACTOR 6: Proximity to Near Coastal Waters

A. Base Score: Enter flow code here (from Factor 2): 31

Enter the multiplication factor that corresponds to the flow code: 0.0

Check appropriate facility HPRI Code (from PCS):

	HPRI#	Code	HPRI Score
☐	1	1	20
☐	2	2	0
☐	3	3	30
☐	4	4	0
☐	5	5	20

Flow code	Multiplication Factor
11, 31, or 41	0.00
12, 32, or 42	0.05
13, 33, or 43	0.10
14 or 34	0.15
21 or 51	0.10
22 or 52	0.30
23 or 53	0.60
24	1.00

HPRI Code Checked:

Base Score (HPRI Score) 0 x (Multiplication Factor) 0.0 = 0 (Total Points)

B. Additional Points – NEP Program

For a facility that has an HPRI code of 3, does the facility discharge to one of the estuaries enrolled in the National Estuary Protection (NEP) program (see instructions) or the Chesapeake Bay?

	Code	Points
☐ YES	1	10
☐ NO	2	0

C. Additional Points – Great Lakes Area of Concern

For a facility that has an HPRI code of 5, does the facility discharge any of the pollutants of concern into one of the Great Lakes' 31 areas of concern (see instructions)?

	Code	Points
☐ YES	1	10
☐ NO	2	0

Code Number Checked: *A.* *B.* *C.*

Total Points Factor 6 *A.* 0 +*B.* 0 +*C.* 0 = 0

NPDES Permit Rating Work Sheet

Score Summary

NPDES No.: PA0002437

Factor	Description	Total Points
1.	Toxic Pollutant Potential	0
2.	Flow/Streamflow Volume	0
3.	Conventional Pollutants	0
4.	Public Health Impacts	20
5.	Water Quality Factors	0
6.	Proximity to Near Coastal Waters	0
	TOTAL (Factors 1 through 6)	20

S1. Is the total score equal to or greater than 80? ☐ YES (Facility is a major) ☑ NO

S2. If the answer to the above question is no, would you like this facility to be discretionary major?

☑ NO

☐ YES (Add 500 points to the above score and provide reason below:

Reason:

NEW SCORE: 20

OLD SCORE:

Ryan Decker
Permit Reviewer's Name

(412) 442-4144
Phone Number

01/07/2021
Date

Reset Form

APPENDIX K

EXISTING SALT STORAGE AND DISTRIBUTION SITES

I. APPLICABILITY

The requirements in Appendix K apply to stormwater discharges from Existing Salt Storage and Distribution Sites with large and/or small stockpiles, regardless of SIC Code, where the discharges do not enter a municipal separate storm sewer system (MS4) that is covered by an NPDES permit.

The term "existing" refers to sites that are used for roadway deicing material storage or distribution as of the effective date of the PAG-03 General Permit. The term "salt" is inclusive of solid chemical products stored and utilized for the principal purpose of deicing roadways for public safety (including but not limited to sodium chloride, magnesium chloride, calcium chloride, calcium magnesium acetate, potassium acetate, and mixtures thereof). The terms "large stockpile" and "small stockpile" refer to sites that are designed for storage of at least 3,000 tons of salt and less than 3,000 tons of salt, respectively.

II. SECTOR-SPECIFIC DISCHARGE PROHIBITIONS

This General Permit does not cover the following discharges:

A. Discharges from new salt storage and distribution sites. New salt storage and distribution sites with large stockpiles must apply for and obtain an individual NPDES permit (or other DEP approval), whether or not such sites are co-located with other industrial activities, unless such discharges will be covered by an MS4 NPDES permit. New salt storage and distribution sites with small stockpiles are not required to seek permit coverage under an individual NPDES permit if the BMPs specified in Section IV of this appendix are implemented and maintained, unless otherwise notified by DEP in writing that permit coverage or other DEP approval is required.

B. Discharges from new or existing salt storage and distribution sites that also store other non-salt and non-aggregate materials for deicing, including but not limited to coal ash and incinerator ash.

III. MONITORING REQUIREMENTS

The permittee must monitor and report analytical results for the parameters listed below on Discharge Monitoring Reports (DMRs) for representative outfalls, subject to footnotes provided. The benchmark values listed below are not effluent limitations, and exceedances do not constitute permit violations. However, if the permittee's sampling demonstrates exceedances of benchmark values for two consecutive monitoring periods, the permittee shall submit a corrective action plan within 90 days of the end of the monitoring period triggering the plan.

Parameter	Monitoring Requirements [1],[2],[3]		Benchmark Values
	Minimum Measurement Frequency [4]	Sample Type	
pH (S.U.)	1 / 6 months	Grab	XXX
Total Suspended Solids (TSS) (mg/L)	1 / 6 months	Grab	100
Total Dissolved Solids (mg/L)	1 / 6 months	Grab	XXX
Chloride (mg/L)	1 / 6 months	Grab	2,000

Footnotes

(1) The permittee shall monitor the listed parameters at representative outfalls that receive runoff (including discharges from stormwater collection ponds) from areas where salt is stored and handled. One sample must be collected during the period October 1 – March 31 (to be submitted on a DMR due April 28) and

one sample must be collected during the period April 1 – September 30 (to be submitted on a DMR due October 28).

(2) Permittees with large stockpiles shall monitor the listed parameters in accordance with Footnote (1). Permittees with small stockpiles shall monitor the listed parameters for the first year of General Permit coverage; if discharge concentrations are less than benchmark values identified above for both sample events, monitoring may be reduced to 1/year during the period October 1 – March 31 for the remainder of the General Permit term, otherwise monitoring must continue semiannually throughout the term.

(3) In accordance with Part C V.B, the permittee shall conduct additional monitoring if specified by DEP in the letter authorizing permit coverage or other correspondence.

(4) This is the minimum number of sampling events required. Permittees are encouraged to perform more than the minimum number of sampling events.

IV. SECTOR-SPECIFIC BMPs

In addition to the BMPs contained in Part C II of the General Permit, the permittee shall implement, at a minimum, all of the following BMPs that are applicable to the processes in place at the facility for which coverage under this General Permit is approved. The following BMPs apply to salt stockpiles only and not stockpiles of antiskid materials (e.g., stone, sand, cinders, etc.) that may be present on-site unless DEP determines that such materials are causing or contributing to pollution, in which case the BMPs shall be implemented upon receipt of written notification from DEP in accordance with a schedule provided by DEP or an approved alternate schedule.

A. Surface and Cover.

1. The permittee shall store salt stockpiles and conduct loading/unloading activities on a synthetic, impermeable surface (i.e., $< 10^{-7}$ cm/sec).

2. If stockpiles are not covered under permanent, structural cover, stockpiles must be covered by materials including but not limited to tarpaulin, polyethylene, polyurethane, polypropylene or hypalon with sufficient strength to prevent tearing. When loading and unloading is not being done, the entire stockpile must be covered at all times.

B. Material Management.

1. Remove covering at the working face just high enough to load out the day's shipment. This will minimize moisture absorption and secure the cover if wind direction shifts toward the working face.

2. Maintain the working face perpendicular to the long axis of the pile by loading alternately left/right and right/left.

3. Avoid creating a horseshoe-shaped working face that results from removing the center of the pile and leaving extended edges or aprons.

4. Maintain adequate cover at the lower edge or toe of the working face to permit maximum possible resealing of the edge of the cover when operations are completed for the day. Take care to avoid cover damage caused by cascading salt from the upper section of the working face.

5. Establish and maintain the working face at the downwind end of the stockpile whenever operationally feasible.

6. Clean up material spills from loading/unloading areas at the end of the work day.

C. Stormwater Management

1. If stormwater collection ponds or basins are installed and utilized, such ponds shall contain a synthetic liner and be managed to limit discharges to only those times where surface water flows are elevated.

2. The permittee shall recycle collected stormwater that may have come into contact with salt materials when determined by the permittee to be feasible.