

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

Application Type Amendment,  
Major  
Facility Type Industrial  
Major / Minor Minor

Application No. PA0010782 A-1  
APS ID 1002893  
Authorization ID 1304137

**Applicant and Facility Information**

Applicant Name	<u>GenOn REMA, LLC</u>	Facility Name	<u>Beagle Club Ash Landfill (formerly part of Titus Generating Station)</u>
Applicant Address	<u>315 Riegelsville Road</u> <u>Milford, NJ 08848</u>	Facility Address	<u>296 Poplar Neck Road</u> <u>Birdsboro, PA 19508</u>
Applicant Contact	<u>Karen McClelland</u>	Facility Contact	<u>Craig Montague</u>
Applicant Phone	<u>(724) 877-4462</u>	Facility Phone	<u>(717) 334-7000</u>
Client ID	<u>302275</u>	Site ID	<u>502733</u>
SIC Code	<u>4953</u>	Municipality	<u>Cumru Township</u>
SIC Description	<u>Refuse Systems</u>	County	<u>Berks</u>
Date Application Received	<u>December 17, 2019</u> <u>February 5, 2020</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>(when received by permits engr.)</u>	If No, Reason	<u></u>
Purpose of Application	<u>Major Amendment of NPDES permit to change permittee name, eliminate ten stormwater outfalls, &amp; separate site into different Primary Facilities (PF's) and tracts.</u>		

**Summary of Review**

The Titus Generating Station used to generate electricity using steam and coal. Those operations ceased and the coal piles were removed. Now their only power generation occurs using Combustion Turbines which use fuel oil, exhaust gases, and generate no wastewater. Because steam is not used and the coal piles have been removed, the regional Clean Water nonpoint source staff confirmed that the stormwater from that tract no longer needs coverage under a NPDES permit consistent with the federal regulations at 40 CFR 122.26(b)(14). The DEP geologist who reviewed the Closure Plan for the Titus Generating Station coal storage area was also consulted and did not object to the stormwater at the site no longer being covered by a NPDES permit. Past stormwater sampling reported to the DEP was reviewed and did not show concentrations of concern. The reported sampling results are attached to this Fact Sheet.

In addition, a tract of Titus Generating Station land was formerly sold to Cumru Townhp. That tract has no industrial activity. Stormwater from that tract also does not need coverage under a NPDES permit.

The stormwater from the Beagle Club Ash disposal site on the opposite side of the Schuylkill River from the Titus Generating Station tract does still need to be covered under a NPDES permit: it mixes with leachate from the Ash site before discharging to the Schuylkill River. (According to the permittee, a cap system was installed at Beagle Club Ash Disposal Site with completion occurring during the latter part of 2017.) The Ash Disposal site was used for ash generated by the Titus Generating Station. It no longer accepts waste but the residual leachate is still subject to the federal ELGs for Steam Electric Power Generating Point Sources 40 CFR Part 423.

The owners of the property are interested in dividing the site into tracts and potentially selling a tract(s). For this reason,

Approve	Deny	Signatures	Date
x		Bonnie J. Boylan / Environmental Engineering Specialist	February 7, 2020
		Daniel W. Martin, P.E. / Environmental Engineer Manager	
		Maria D. Bebenek, P.E. / Environmental Program Manager	

### Summary of Review

DEP was asked to prioritize the review of the applications to amend the NPDES permit and to transfer two WQM permits, one WQM permit associated with the Titus Generating Station tract and one WQM permit associated with the Beagle Club Ash Disposal site. All three of these permits were previously issued to NRG REMA LLC. The permittee requested that the permits be changed to GenOn REMA, LLC.

For any future activities on any tracts, the owners or operators will need to hold permits applicable to their operations. For example, if a new industry were to purchase the former area of the steam power generation and coal pile area, their activities could trigger the need for a new NPDES stormwater permit. It would be incumbent on the new owners or operators to make an application and obtain such a permit in that case; a new NPDES permit number would be assigned by the DEP.

Instead of multiple site numbers, DEP's Central Office advised regional staff to use multiple Primary Facility (PF) numbers which was done. The former steam electric generating station tract retained the previous PF number of #246169 while the new PF number of #840311 has been assigned to the Beagle Club Ash Landfill. (Other DEP programs besides the Clean Water Program use different PF numbers for their permits, registrations, or approvals. For example, the Air Program will use a different PF# for the Combustion Turbines at the site.)

The limits and monitoring requirements for outfall 004 and Internal Monitoring Point 104 in NPDES permit PA0010782 have not changed. These are the discharges of leachate and stormwater from the Beagle Club Ash Disposal site.

Specific changes made:

- the permittee name (from NRG REMA LLC to GenOn REMA LLC);
- the facility name (from NRG Titus Generating Station to Beagle Club Ash Disposal Site);
- the ten stormwater outfalls from the other tracts have been removed from Part A and Part C of the NPDES permit (outfalls 001 and 005 through 013);
- in Part C, the 'Annual inspection and compliance evaluation' paragraph and 'Stormwater sampling requirements' paragraph were removed because these apply to stormwater-only discharges where there is no control of the flow and because the Supplemental DMR forms specified in these paragraphs are no longer in use;
- updated 'Bureau of Point and Nonpoint Source Management' to 'Bureau of Clean Water'.

### 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.



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Stormwater monitoring results  
from eDMR/WMS

**Proposed Effluent Limitations and Monitoring Requirements**

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (362-0400-001), SOPs and/or BPJ.

**Outfall 004, Effective Period: Permit Effective Date through Permit Expiration Date.**

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	1/discharge	Estimate
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/discharge	Grab
TSS	XXX	XXX	XXX	30	100	XXX	1/discharge	24-Hr Composite
Total Dissolved Solids	XXX	XXX	XXX	3500	7000	8750	1/discharge	24-Hr Composite
Oil and Grease	XXX	XXX	XXX	15	20	30	1/discharge	Grab
Sulfate	XXX	XXX	XXX	XXX	Report	XXX	1/discharge	Grab
Chloride	XXX	XXX	XXX	XXX	Report	XXX	1/discharge	Grab
Bromide	XXX	XXX	XXX	XXX	Report	XXX	1/discharge	Grab
PCBs (Dry Weather) (pg/L)	XXX	XXX	XXX	XXX	Report	XXX	1/year	24-Hr Composite
PCBs (Wet Weather) (pg/L)	XXX	XXX	XXX	XXX	Report	XXX	1/year	24-Hr Composite

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**Outfall 104, Effective Period: Permit Effective Date through Permit Expiration Date.**

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Flow (MGD) Internal Monitoring Point	Report	Report Daily Max	XXX	XXX	XXX	XXX	1/discharge	Estimate
pH (S.U.) Internal Monitoring Point	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/discharge	Grab
TSS Internal Monitoring Point	XXX	XXX	XXX	30	100	XXX	1/discharge	Grab
Oil and Grease Internal Monitoring Point	XXX	XXX	XXX	15	20	30	1/discharge	Grab