

Application Type Renewal
Facility Type Industrial
Major / Minor Minor

**NPDES PERMIT FACT SHEET
SECOND DRAFT**

Application No. PA0011517
APS ID 845231
Authorization ID 1279928

Applicant and Facility Information

Applicant Name	<u>Keystone Cement Company</u>	Facility Name	<u>Keystone Cement Company</u>
Applicant Address	<u>Route 329, Box A</u> <u>Bath, PA 18014-0058</u>	Facility Address	<u>Route 329</u> <u>Bath, PA 18014</u>
Applicant Contact	<u>Beth Rinaldi,</u> <u>E.H. & S. Document Coordinator</u>	Facility Contact	<u>Beth Rinaldi,</u> <u>E.H. & S. Document Coordinator</u>
Applicant Phone	<u>(610) 837-1881</u>	Facility Phone	<u>(610) 837-1881</u>
Client ID	<u>245087</u>	Site ID	<u>451528</u>
SIC Code	<u>3241</u>	Municipality	<u>East Allen Township</u>
SIC Description	<u>Manufacturing - Cement, Hydraulic</u>	County	<u>Northampton</u>
Date Published in PA Bulletin	<u>July 11, 2020</u>	EPA Waived?	<u>Yes</u>
Comment Period End Date	<u>August 10, 2020</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>Renewal of an NPDES permit for discharge of treated Industrial waste and stormwater.</u>		

Internal Review and Recommendations

A first draft of this application appeared in the PA Bulletin on July 11, 2020.

The purpose of this second draft is due to a comment letter dated August 10, 2020 that was received via email on August 10, 2020 from Keystone Cement Company (Keystone). The comment letter offered three comments for the Department's consideration:

Comment #1 requests the sampling frequency for total aluminum and total iron at Outfall 002 be changed to 1/6 months to match the other outfalls.

Response – The sampling frequency for total aluminum and total iron at Outfall 002 was been adjusted to 1/quarter. This outfall has a higher sampling frequency for total aluminum and total iron due to the discharge consisting of quarry dewatering, non-contact cooling water (overflow from site impoundment), and stormwater. The other outfalls only discharge stormwater. The permittee also requested to relocate Internal Monitoring Point 102 (IMP 102) to Outfall 002. IMP 102 was used to monitor quarry dewatering and intermittent non-contact cooling water flow before they entered the 7.0-million-gallon-impoundment. A site visit by the Water Quality Specialist Supervisor, Stephen Pletchan, confirmed this change was acceptable; however, he requested an increase in sampling from the previous permit's frequency of 1/year.

Comment #2 further explains that having a 1/month sampling frequency would not allow the facility enough time to collect samples since the sample needs to be collected from a storm even greater than 0.1 inches in magnitude and occur at least 72 hours from the previous storm event measuring 0.1 inches in magnitude. The permittee requests the permit be revised to address sample frequency periods when a sample cannot be obtained in accordance with Part C, Section III. F.

Response – The sampling frequency was adjusted to 1/quarter. Discharge Monitoring Reports (DMRs) also have a box to check if there was no discharge from an outfall during the monitoring period. There is also a comments section on the DMR if more information needs to be explained by the permittee.

Approve	Return	Deny	Signatures	Date
X			/s/ Allison Seyfried / Environmental Engineering Specialist	October 8, 2020
X			/s/ Amy M. Bellanca, P.E. / Environmental Engineer Manager	10-28-20

Internal Review and Recommendations

Comment #3 requests clarification from the Department regarding if the limits in the permit are benchmark values (like in the PAG-03 General Permit) or if they are actual limits.

Response – The effluent limits for all outfalls in this permit are not benchmark values and exceedance can constitute permit violations. This facility has an Individual NPDES Permit, not a General Permit. General Permits cannot be granted to facilities that discharge stormwater to surface waters classified as High Quality (HQ) or Exceptional Value (EV). Discharges from this facility are to Monocacy Creek, which is classified as HQ-CWF. Monocacy Creek is also impaired for habitat alterations and siltation. Although the parameters that are required for monitoring/ sampling are based off the SIC Code of the facility and corresponding Appendix from the PAG-03, it does not mean that all the same conditions apply.

A pre-application meeting occurred via Skype for this facility on September 24, 2020 regarding the installation of a natural gas line onsite. The facility has an existing NPDES Permit for Construction Activities. The Clean Water Program should be notified if the addition or removal of any outfalls is planned or if there are any changes to the drainage areas to each outfall.



08-10-2020
Comment Letter Key: