

Application Type Renewal
Facility Type Industrial
Major / Minor Minor

**NPDES PERMIT FACT SHEET
THIRD 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>November 14, 2020</u>	EPA Waived?	<u>Yes</u>
Comment Period End Date	<u>December 14, 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

The purpose of this third draft is due to a comment letter dated December 14, 2020 that was received via email on December 14, 2020 from Keystone Cement Company (Keystone). The comment letter offered two comments for the Department's consideration:

Comment 1: Part A – Section I.A – Outfall 002

“A review of the effluent limitations for Keystone Outfall 002 indicates the addition of analyses for total aluminum and total iron at a frequency of one grab sample per quarter (1/quarter). Sampling in accordance with the current NPDES Permit is performed for total iron annually (1/year). In accordance with the latest statewide *PAG-03 General Permit for Discharges of Stormwater Associated with Industrial Activity (9/2016), Appendix N - Glass, Clay, Cement, Concrete and Gypsum Products*, sampling for total iron (and total aluminum) is required semiannually (1/6 months). Sampling at a rate of 1/6 months reflects a 100% increase in the current sampling requirement, which addresses the increase in sampling frequency requested for Outfall 002 in the NPDES Permit Fact Sheet Second Draft. Additionally, the Fact Sheet for the First Draft NPDES Permit notes that “Semi-annual monitoring and reporting for pH, Total Aluminum, and *Total Iron* [emphasis added] are also required under this permit” as if the semi-annual sampling requirement was intended to apply to each outfall at the Keystone facility. With the Second Draft NPDES Permit, the requirements of Internal Monitoring Point (IMP) 102 and Outfall 002 have been combined at the request of the facility, i.e., IMP 102 no longer exists as a monitoring point of compliance, and the requirements applicable in IMP 102 have been transferred to Outfall 002. Although the requirements of IMP 102 and Outfall 002 are now combined, there are no changes in the contributions to the makeup water that discharges from Outfall 002. Currently, Outfall 002 is monitored for total iron at a frequency of 1/year. Because there are no changes in the type of effluent at Outfall 002, there will be no changes in total iron results from current analyses. The need to increase sampling 300% (1/quarter) is unwarranted; an increase of 100% (1/6 months) should be acceptable for the reasons noted above.”

Response –Outfall 002 is the discharge from a 7.0-million-gallon impoundment that is utilized as an alternate water source for quarry operations and dust control. In the previous permit, Internal Monitoring Point (IMP) 102 was used to monitor quarry dewatering and intermittent non-contact cooling water flows before they enter the 7.0-million-gallon impoundment. In the

Approve	Return	Deny	Signatures	Date
X			/s/ Allison Seyfried / Environmental Engineering Specialist	April 23, 2021
X			/s/ Amy M. Bellanca, P.E. / Environmental Engineer Manager	6-8-21

Internal Review and Recommendations

permit renewal application, the permittee requests the relocation of the point of compliance from IMP 102 to Outfall 002. A site visit was conducted by the Water Quality Specialist Supervisor, Stephen Pletchan, to review this proposal. Since Outfall 002 is the actual discharge from the site and the NCCW and quarry water already combine before IMP 102, there were no objections to the permittee's request. He requested an increase in sampling from the pervious permit. The Department requested 1/month sampling for Total Aluminum and Total Iron at Outfall 002 in the first draft of the permit. The sampling frequency was then decreased to 1/quarter in the second draft permit. After further review of the application and the comment letters, the Department has decided that 1/6 months sampling is acceptable for Total Iron and Total Aluminum at Outfall 002. 1/6 months sampling is consistent with the other outfalls at the site and is an increase from the 1/year sampling in the previous permit. Outfall 002 also has 1/day sampling requirements for Total Suspended Solids (TSS) and pH and 1/week reporting for Flow, as per EPA's CFR Title 40 Part 411 - Cement Manufacturing Point Source Category.

Comment 2: Part A – Section I.C – Outfall 004

"This section of the permit identifies specific information regarding Outfall 004, including latitude/longitude, receiving waters, type of effluent, effluent limitations and monitoring requirements. The type of effluent for Outfall 004 is listed as "Other Miscellaneous Discharges." Keystone's NPDES renewal application describes the wastewater or stormwater discharge as "Quarry Dewatering and Stormwater" (see page 4, Form 3800-PM-BCW0008b (Rev. 1/2019), Keystone's NPDES Permit renewal application, July 1, 2019). Additionally, PADEP's "Summary of Review" for the initial NPDES Permit Fact Sheet received by Keystone on June 24, 2020, notes that "Outfall 004 consists of stormwater and quarry groundwater dewatering." Therefore, Keystone requests that the type of effluent for Outfall 004 be revised to state "Quarry Dewatering and Stormwater."

Response – The type of effluent for Outfall 004 was revised to state "Quarry Dewatering and Stormwater."



1st Draft Comment
Letter Keystone Cem



2nd Draft Comment
Letter Keystone Cem