

Application Type Renewal
Facility Type Industrial
Major / Minor Minor

**NPDES PERMIT FACT SHEET
FOURTH 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 Box A</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>June 26, 2021</u>	EPA Waived?	<u>Yes</u>
Comment Period End Date	<u>July 26, 2021</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>Renewal of an NPDES permit for discharge of treated industrial wastewater and stormwater.</u>		

Internal Review and Recommendations

The purpose of this fourth draft permit is due to a comment letter dated July 26, 2021 that was received via email on July 26, 2021 from Keystone Cement Company (Keystone) and also because 6 months (or 180 days) have elapsed since the previous draft has been issued.

The permit consists of limitations for Outfalls 002, 003, 004, 005, and 006. Outfalls 003, 005, and 006 are stormwater only. Outfall 004 consists of stormwater and quarry groundwater dewatering. 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 previously issued 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 permit renewal application, the permittee requested 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. IMP 102 was removed from the permit and all sampling requirements were moved to Outfall 002.

Keystone has since realized that a significant amount of work is necessary to prepare for safe access to the sample point at Outfall 002 because the outfall is located on a steep embankment that is vegetated with trees and weeds. Keystone determined that the location would not be ready for daily sampling at the time the permit would become effective.

Therefore, the most recent comment letter dated July 26, 2021 requests that, "the Department consider allowing both locations as the point of compliance – IMP 102 or Outfall 002. This will provide Keystone with the ability to sample either location and comply with the same effluent limitations provided in the Third Draft NPDES Permit".

Response - The definition for "At Outfall (XXX)" on page 8 of the NPDES permit states that "At Outfall (XXX) means a sampling location in outfall line XXX below the last point at which wastes are added to the outfall line

Approve	Return	Deny	Signatures	Date
X			/s/ Allison Seyfried / Environmental Engineering Specialist	December 20, 2021
X			/s/ Amy M. Bellanca, P.E. / Environmental Engineer Manager	12-27-21

Internal Review and Recommendations

(XXX), or where otherwise specified". The IMP 102 sampling location occurs after the quarry water discharge and the NCCW. Therefore, the standard wording of "at Outfall 002" in the table on page 2 of the NPDES permit will be maintained. This wording allows the permittee to take samples at either the IMP 102 location or at Outfall 002. Keystone should identify which location each sample is collected.

The standard template of the NPDES Permit was revised in August 2021 and has been used for this fourth draft permit.

Please note that on August 28, 2021, updated NPDES regulations at 25 Pa. Code § 92a.62 related to annual fees became effective. The facility covered by the permit is classified in the Minor IW Facility with ELG fee category, which has an annual fee of \$3,000. Invoices for annual fees will be mailed to permittees approximately three months prior to the due date, which is the anniversary of the effective date of your latest new or reissued permit prior to August 28, 2021. Please review Part A of your permit related to annual fees. These annual fees are effective now and may be billed before your draft permit is finalized, unless your facility is exempt from these fees under 25 Pa. Code § 92a.62.



1st Draft Comment
Letter Keystone Cem



2nd Draft Comment
Letter Keystone Cem



3rd Draft Comment
Letter Keystone Cem