

Application Type Renewal
Facility Type Storm Water
Major / Minor Minor

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

Application No. PA0011631
APS ID 1074675
Authorization ID 1415811

Applicant and Facility Information

Applicant Name	<u>WP Cromby LLC</u>	Facility Name	<u>Former Cromby Generating Station</u>
Applicant Address	<u>133 River Road</u> <u>Mystic, CT 06355</u>	Facility Address	<u>100 Cromby Road</u> <u>Phoenixville, PA 19460</u>
Applicant Contact	<u>Timothy Conway</u>	Facility Contact	<u>Timothy Conway</u>
Applicant Phone	<u>(516) 322-5531</u>	Facility Phone	<u>(516) 322-5531</u>
Client ID	<u>344193</u>	Site ID	<u>455163</u>
SIC Code	<u>4911</u>	Municipality	<u>East Pikeland Township</u>
SIC Description	<u>Trans. & Utilities - Electric Services</u>	County	<u>Chester</u>
Date Application Received	<u>October 27, 2022</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u></u>	If No, Reason	<u></u>
Purpose of Application	<u>Permit Renewal</u>		

Summary of Review

The applicant requests renewal of an NPDES permit to discharge stormwater from Former Cromby Generating Station through various outfalls. All steam electric generation related activities at the facility were discontinued in 2011 and decommissioning efforts were completed in 2012. The property is in the later-stage process of demolition, dismantling, and recycling.

There are 4 Outfalls 002, 004, 008 and 009 at the site.

According to the records, stormwater discharges from Outfalls 002 and 004 are very similar, collecting stormwater mainly from near/surrounding areas of the former main buildings. Therefore, as a representative outfall, monitoring is only required at Outfall 004 for stormwater parameters pH, TSS, Oil and Grease, and Iron, total similar to the existing permit.

Outfall 008 is comprised mainly of surface runoff from agricultural fields located adjacent to the west of the facility. This drainage area is not part of the facility property, does not include any industrial activity, and is not under the control of the permittee. No monitoring is required similar to the existing permit.

Outfall 009 collects stormwater from some portions of the old railroad. The remaining areas are upland farmland, vegetated areas, and cleaned concrete pads formerly used for storage. Monitoring is required for the stormwater parameters pH, TSS, Oil and Grease, and Iron, total similar to the existing permit.

Because the site has been largely cleared, dismantled, and unoccupied, the outfalls are inspected only during semi-annual stormwater sampling events. Outfall maintenance usually consists of clearing of vegetation, as needed.

Monitoring for PCBs continued in the draft permit for Outfalls 002, 004 and 009 similar to the existing permit.

Approve	Deny	Signatures	Date
X		<i>Sara Abraham</i> Sara Reji Abraham, E.I.T. / Project Manager	November 14, 2022
X		<i>Pravin Patel</i> Pravin C. Patel, P.E. / Environmental Engineer Manager	11/14/2022

Summary of Review

Based on the PCB sampling results, a condition to develop and implement PCB Pollutant Minimization Plan (PMP) was included in the existing permit. The current permittee was not aware of this requirement and has not followed the requirement. A similar condition is included in the draft permit for PCB PMP development and implementation. According to the referenced condition, the permittee is required to submit a PMP for PCBs within 12 months from the effective date of the permit and commence implementation of the PMP within 60 days of receipt of a PMP completeness determination issued by DEP to be in compliance with the permit.

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.

Act 14 Notifications:

East Pikeland Township - October 31, 2022
Chester County - November 1, 2022

Permit Conditions:

- A. Stormwater Outfalls
- B. BMPs
- C. Routine Inspections
- D. PPC Plan
- E. Stormwater Monitoring Requirements
- F. Acquire Necessary Property Rights
- G. Proper Sludge Disposal
- H. PCB/PMP Requirement

Discharge, Receiving Waters and Water Supply Information

Outfall No.	<u>004</u>	Design Flow (MGD)	<u>0</u>
Latitude	<u>40° 9' 10.20"</u>	Longitude	<u>-75° 31' 39.10"</u>
Quad Name	<u>Phoenixville</u>	Quad Code	<u>1741</u>
Wastewater Description: <u>Stormwater</u>			
Receiving Waters	<u>Schuylkill River</u>	Stream Code	<u>00833</u>
NHD Com ID	<u>25989560</u>	RMI	<u>39.56</u>
Watershed No.	<u>3-D</u>	Chapter 93 Class.	<u>WWF, MF</u>
Assessment Status	<u>Impaired</u>		
Cause(s) of Impairment	<u>PCB</u>		
Source(s) of Impairment	<u>Source Unknown</u>		
TMDL Status	<u>Final</u>	Name	<u>Schuylkill River PCB TMDL</u>

Discharge, Receiving Waters and Water Supply Information

Outfall No.	<u>002</u>	Design Flow (MGD)	<u>0</u>
Latitude	<u>40° 9' 10.20"</u>	Longitude	<u>-75° 31' 39.10"</u>
Quad Name	<u>Phoenixville</u>	Quad Code	<u>1741</u>
Wastewater Description: <u>Stormwater</u>			
Receiving Waters	<u>Schuylkill River</u>	Stream Code	<u>00833</u>
NHD Com ID	<u>25989560</u>	RMI	<u>39.66</u>
Watershed No.	<u>3-D</u>	Chapter 93 Class.	<u>WWF, MF</u>
Assessment Status	<u>Impaired</u>		
Cause(s) of Impairment	<u>PCB</u>		
Source(s) of Impairment	<u>Source Unknown</u>		
TMDL Status	<u>Final</u>	Name	<u>Schuylkill River PCB TMDL</u>

Discharge, Receiving Waters and Water Supply Information

Outfall No.	<u>008</u>	Design Flow (MGD)	<u>0</u>
Latitude	<u>40° 9' 33.46"</u>	Longitude	<u>-75° 31' 37.11"</u>
Quad Name	<u>Phoenixville</u>	Quad Code	<u>1741</u>
Wastewater Description: <u>Stormwater</u>			
Receiving Waters	<u>Schuylkill River</u>	Stream Code	<u>00833</u>
NHD Com ID	<u>25989560</u>	RMI	<u>40.11</u>
Watershed No.	<u>3-D</u>	Chapter 93 Class.	<u>WWF, MF</u>
Assessment Status	<u>Impaired</u>		
Cause(s) of Impairment	<u>PCB</u>		
Source(s) of Impairment	<u>Source Unknown</u>		
TMDL Status	<u>Final</u>	Name	<u>Schuylkill River PCB TMDL</u>

Discharge, Receiving Waters and Water Supply Information

Outfall No.	<u>009</u>	Design Flow (MGD)	<u>0</u>
Latitude	<u>40° 9' 10.20"</u>	Longitude	<u>-75° 31' 39.10"</u>
Quad Name	<u>Phoenixville</u>	Quad Code	<u>1741</u>
Wastewater Description: <u>Stormwater</u>			
Receiving Waters	<u>Schuylkill River</u>	Stream Code	<u>00833</u>
NHD Com ID	<u>25989560</u>	RMI	<u>39.66</u>
Watershed No.	<u>3-D</u>	Chapter 93 Class.	<u>WWF, MF</u>
Assessment Status	<u>Impaired</u>		
Cause(s) of Impairment	<u>PCB</u>		
Source(s) of Impairment	<u>Source Unknown</u>		
TMDL Status	<u>Final</u>	Name	<u>Schuylkill River PCB TMDL</u>

Compliance History

DMR Data for Outfall 002 (from October 1, 2021 to September 30, 2022)

Parameter	SEP-22	AUG-22	JUL-22	JUN-22	MAY-22	APR-22	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21
PCBs (Wet Weather) (pg/L) Daily Maximum										854458		

DMR Data for Outfall 004 (from October 1, 2021 to September 30, 2022)

Parameter	SEP-22	AUG-22	JUL-22	JUN-22	MAY-22	APR-22	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21
pH (S.U.) Daily Maximum				7.44						7.11		
TSS (mg/L) Daily Maximum				31						3.0		
Oil and Grease (mg/L) Daily Maximum				< 5.0						< 5.0		
Total Iron (mg/L) Daily Maximum				0.61						0.46		
PCBs (Wet Weather) (pg/L) Daily Maximum										27330		

DMR Data for Outfall 009 (from October 1, 2021 to September 30, 2022)

Parameter	SEP-22	AUG-22	JUL-22	JUN-22	MAY-22	APR-22	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21
pH (S.U.) Daily Maximum				7.33						6.90		
TSS (mg/L) Daily Maximum				2.0						2.0		
Oil and Grease (mg/L) Daily Maximum				< 5.0						< 5.0		
Total Iron (mg/L) Daily Maximum				0.06						0.09		
PCBs (Wet Weather) (pg/L) Daily Maximum										845		

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 002, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Maximum	Instant. Maximum		
PCBs Wet Weather Analysis (pg/L)	XXX	XXX	XXX	XXX	Report Daily Max	XXX	1/year	Grab

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) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Suspended Solids	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Iron, Total	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
PCBs Wet Weather Analysis (pg/L)	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab

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 009, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Suspended Solids	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Iron, Total	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
PCBs Wet Weather Analysis (pg/L)	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab