pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Northeast Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0028495**
Facility Type	**Industrial**	APS ID	**598645**
Major / Minor	**Minor**	Authorization ID	**1449556**

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

Applicant and Facility Information

Applicant Name	**FedChem LLC**	Facility Name	**FedChem LLC**
Applicant Address	275 Keystone Drive Bethlehem, PA 18020-9464	Facility Address	275 Keystone Drive Bethlehem, PA 18020-9464
Applicant Contact	Anthony Porcino	Facility Contact	David Burrell
Applicant Phone	(610) 837-1808	Facility Phone	(610) 837-1808
Client ID	205257	Site ID	237306
SIC Code	2819 (primary per application), 2869	Municipality	Lower Nazareth Township
SIC Description	Manufacturing - Industrial Inorganic Chemicals, Nec, Manufacturing - Industrial Organic Chemicals, Nec	County	Northampton
Date Application Received	August 3, 2023	EPA Waived?	Yes
Date Application Accepted	January 12, 2024	If No, Reason	-

Purpose of Application: RENEWAL OF EXISTING NPDES PERMIT.

Summary of Review

This is an existing 0.622 MGD Individual IW (Minor without ELG) NPDES Permit Renewal for the discharge of NCCW and IW stormwater to Monocacy Creek (HQ-CWF; Stream# 3384; with known impairments causes including habitat alteration, siltation, and pathogens of unknown source).

- **NPDES Permit Basis Flow**: The previous permit authorized a 0.622 MGD NCCW discharge.
  - NCCW: 0.622 MGD NCCW discharge is continuous (24-hours/day, 7-days/week), using site groundwater. The application noted they replaced the well flow meter with a calibrated flow-meter in October 2024, so post-October 2024 NCCW flow data may be more accurate. The DRBC Docket Update application indicates well water is used to cool FedChem's jacketed-reactor vessels and condensers.
    - NCCW source: The Industrial Use Groundwater Withdrawals are Well 1 (012417-004, active) and Well 2 (012417-001, inactive). The NCCW water source (Well No. W-100) is groundwater well(s) under a DRBC withdrawal docket (being concurrently updated for 0.622 MGD withdrawal/discharge). The NCCW wellwater is not treated. Only Pollutant Group Table 1 information is available (no metal data available for NCCW), showing 253 mg/l Total Hardness in the NCCW (i.e. from the well water).
    - NCCW System: The application noted that the NCCW is metered aboveground at the submersible pump's discharge for Well W-001 (NCCW water source) and it is routinely sampled at IMP-101 where the NCCW outlet pipe daylights for discharge into the Open Pit (where it commingles with stormwater from Northern drainage area #5 prior to discharge to Outfall No. 001). The (inaccessible) IMP-201 is at the bottom of the Open Pit, where stormwater from the northern drainage area #5 may be combined with the NCCW water before being released through an underground pipe to Outfall No. 001 and Monocacy Creek.
    - Mismatch with DRBC Docket No. D-1971-064 (Rerate/increased discharge flow for surface water discharge of NCCW): The revised NPDES Permit application included copies of DRBC Docket

Approve	Deny	Signatures	Date
X		James D. Berger (signed) James D. Berger, P.E. / Environmental Engineer	July 3, 2025
X		Edward Dudick, P.E. / Environmental Engineer Manager	July 3, 2025

Summary of Review

update applications requests to increase the DRBC-approved flow rates from 0.507 MGD to 0.622 MGD (432 GPM). The DRBC has received the Docket update applications per separate communication. **NOTE**: The NPDES Permit does not supersede the DRBC Docket requirements or vice-versa. The DRBC remains able to enforce its own docket requirements separately from the Department. The existing DRBC Docket D-1971-064 had approved a 0.507 MGD "Entitlement Allocation" (groundwater). The Application previously included a 3/3/1989 DRBC Letter which noted that DRBC review and approval would be required for an increase in withdrawal rate (with a handwritten note that the withdrawal rate was 0.561 MGD). The Application included a 3/1/2023 DRBC Invoice that noted the DRBC Docket approved a 0.507 MGD withdrawal rate.

- IW Stormwater: IW stormwater flows do not count against the NPDES Permit Basis flow here. Outfall No. 001 receives IW stormwater flow from a northern drainage area, but post-flow measurement and post-NCCW sampling/temperature measurement (IMP No. 101). The facility's SIC Codes trigger minimum IW Stormwater General Permit (PAG-03) Appendix F (Chemical and Allied Products) requirements, with additional considerations due to HQ-CWF receiving stream.
  - Outfall No. 001 stormwater: Post-NCCW flow measurement/sampling/temperature measurement, the NCCW flows into an open pit where the discharge is commingled with IW stormwater from a northern drainage area (prior to discharge via Outfall No. 001). They estimate an "episodic" IW stormwater contribution to the Outfall No. 001 discharge at the 28,036 GPD range (from Northern area drainage area). The (inaccessible) IMP No. 201 (stormwater contribution to Outfall No. 001) is located at the bottom of open pit where commingling with NCCW occurs. No Outfall 001/IMP 201 stormwater sampling data is available. The application estimated 28,036 GPD episodic flow from a Northern drainage area flows to Outfall No. 001. **NOTE**: Previous NPDES Permit approved Outfall No. 001 for NCCW only and listed IMP No. 201 as an IW outfall, but it is inaccessible for stormwater monitoring and mixes directly with the NCCW discharge. But since IMP 201 discharges via Outfall No. 001, Outfall No. 001 is a combined NCCW/stormwater outfall.
  - Outfall Nos. 002 – 006: Five (5) diked stormwater outfall drainage areas with sampling points at Outfall Nos. 002 – 006. Discharge is routed to either offsite disposal or stormwater release after limited inspection/testing. Total stormwater discharge estimated at 78,480 GPD (from diked areas discharging via IW stormwater outfalls Nos. 002 – 006). No wastewater tank dike discharge (all goes offsite for disposal).
  - New Drainage Area/Outfall Nos. 007 and 008: Two additional stormwater sheet flow/infiltration areas have been broadly defined (Outfalls Nos. 007 and 008) for site drainage on the Monocacy Creek side and Keystone Drive side of the plant (whatever stormwater flow that is not directed through the previously permitted IW Stormwater Outfalls for diked areas). These areas are subject to IW stormwater requirements (BMPs, PPC Plan, etc.) wherever site Industrial Activities and/or material handling areas do not discharge through Outfall Nos. 002 through 006. See Part C.IV.F.2 standard language regarding representative sampling upon request. (The internet contains guidance on how to sample sheet flow drainage if ever necessary)
  - See Effluent Section for additional Stormwater Information.
- Other Waste Streams:
  - Sanitary wastewater goes to septic tanks onsite.
  - Lab, boiler feed, process, and cleanup wastewater is shipped offsite for disposal.
  - No chemical additives have been proposed for usage. Chemical additive conditions have been added in event the facility ever chooses to use chemical additives in the NCCW system.

- **Permittee EIN#**: Applicant indicated previous E-facts EIN# was mistakenly that of a parent company. **Information forwarded to DEP Client Verifiers for updating client information.** The Application included letters stating:
  - "The facility's FEIN did not change, rather the parent company's FEIN (34-1129463) was mistakenly used on previous regulatory submittals. A letter from FedChem's Corporate Controller is included with this submittal that confirms the correct FEIN as 13-4360586". A 10/3/2008 US Treasury Letter included the FedChem EIN# and attached Form W-9 (Request for Taxpayer Identification Number and Certification). The 2008 US Treasury Letter indicated FEDCHEM LLC (%Federal Process Corporation SOLE) has an EIN# of 13-4360586, but they say that they mistakenly used the former parent company's in previous applications.
  - "We have become aware that certain agencies may have previously registered FedChem LLC using the FEIN of its parent company at the time (Federal Process Corp; 34-1129463)". "FedChem LLC's FEIN: 13-4360586".
  - DRBC Docket No. D-1971-064 Update Application Information: The parent company for the applicant is "FPC International"

Summary of Review

- As of 7/3/2025, FedChem LLC was not found on the PA Department of State Business search webpage. Neither was the identified parent company ("Federal Process Corp.").

- **Facility Description**: FedChem manufactures industrially applicable aluminum complex grease. Per previous Renewal FS: "FedChem, LLC manufactures aluminum based organic and inorganic chemicals from aluminum metal, alcohols, fatty acids, esters, resins, oils and mineral spirits. There are no process wastes discharged from the facility, nor are there any chemical additives used".
  - Applicable ELGs for this industry: The facility is only discharging NCCW and stormwater to Monocacy Creek, i.e. no ELG applies to the current site discharge. NPDES Application ELG Section was not completed. The identified SIC Codes would subject the facility to 40 CFR 415 (Inorganic Chemicals) pre-treatment requirements and 40 CFR 414 (Industrial Organic Chemicals NEC) pre-treatment requirements in the absence of any direct discharge of IW wastewater from this site. Inspection Reports indicate the site has been sending its wastewater to the LCA Pretreatment Plant
  - Other Permits: Facility has an Air Quality Permit and is a Large Quantity HW generator.

Permit Conditions:

Parts A and B: See below:
- **General**: See updated Part A and B standard conditions.
- **Part A.I.A and A.I.B**: The NCCW in-situ temperature monitoring location and point of compliance has been set at IMP No. 101, in the absence of application information indicating any other in-situ effluent temperature monitoring location.
- **Part A.I.C**: The application noted that the NCCW is metered aboveground at the submersible pump's discharge for Well W-001 (NCCW water source) and it is routinely sampled at IMP-101 where the NCCW outlet pipe daylights for discharge into the Open Pit (where it commingles with stormwater from Northern drainage area prior to discharge to Outfall No. 001).
  - The Flow measurement location has been set to the calibrated NCCW Well-water flow meter as the Department generally does not count separate stormwater contributions as part of the NPDES Permit-basis flow, and in the absence of any alternative effluent flow meter.
  - The NCCW sampling location and point of compliance has been set at IMP No. 101 by permittee choice.
  - The Outfall No. 001 Semi-annual metal sampling has been set concurrent with the semi-annual stormwater sampling to allow direct comparison, including the monthly Total Aluminum sampling.

Part C Conditions: Changes bolded:
- **Part C.I.A, B**: Existing Necessary property rights; Residuals management
- **Part C.I.C and D: New standard IW permit conditions (Relationship to WQM permits; ELG/BAT)**
- **Part C.I.E**: Existing no changes of 2 °F in one hour in receiving stream condition.
- **Part C.II: New Schedule of Compliance due to proposed Final Thermal Limits due to updated thermal modeling (including revised Q7-10 low flow assumptions).**
  - **The permittee requested a 4.5-year (54-month) schedule of compliance after being notified of the proposed revised limits in a technical deficiency letter. The request has been granted.**
  - Besides the permittee-noted options of substantially reduced NCCW discharge rates and/or reduced NCCW temperatures during October through February (that it planned to investigate via engineering study), the permittee has other options that it can pursue during the Schedule of Compliance:
    - Site-specific stream temperature monitoring can be used to refine the thermal modeling. In practical terms, the Department would not require a discharge to be colder than the ambient stream temperatures, with the usual allowance for a minor increase in temperature.
    - The Department used a conservative stream low flow value for reasons discussed in the Stream section (below). The permittee can investigate if additional data/analysis might justify a larger Q7-10 low flow value at Outfall No. 001 in the thermal modeling. If justified, a higher Q7-10 low flow might allow for less stringent permit limits.
    - The facility Outfall No. 001 is upstream of the confluence with the East Branch Monocacy Creek. The facility could consider relocating the Outfall No. 001 discharge to benefit from the additional flow dilution at or below the confluence.
    - The in-situ Temperature sensor placement can be checked to determine if it is representatively measuring effluent temperatures.
    - Etc.

Summary of Review

- **Part C.III: New standard Chemical Additive conditions (replacing previous Part C.I.D which only prohibited usage prior to Department authorization).** Previous Part C.I.D condition prohibited use of any chemical additives (for control of corrosion, scaling, algae, slime, fouling or oxygen, etc., shall be made to the cooling or boiler water system), but the standard condition would allow for their usage if they obtain prior approval under the permit-defined process. No chemical additives were requested in the application, but this condition addresses any potential future usage that results in a discharge to the environment.
- **Part C.IV: Updated** IW Stormwater conditions **(including new standard benchmarks and corrective action requirements for consecutive benchmark exceedances).**

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.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	001 002 - 008	Design Flow (MGD)	0.622 (NCCW) Zero (stormwater only)
Latitude	40º 41' 27.8" (002) 40º 41' 28.0" (003) 40º 41' 28.5" (004) 40º 41' 29.1" (005) 40º 41' 29.6" (006) 40º 41' 28.16" (007) 40º 41' 28.07" (008)	Longitude	-75º 21' 53.6" (002) -75º 21' 53.8" (003) -75º 21' 54.2" (004) -75º 21' 55.0" (005) -75º 21' 56.0" (006) -75º 21' 56.43" (007) -75º 21' 54.82" (008)
Quad Name	Nazareth	Quad Code	1343 (6.22.1)
Wastewater Description:	001: Noncontact Cooling Water (NCCW) & Stormwater 002, 003, 004, 005, 006, 007, and 008: Stormwater		

Receiving Waters	Monocacy Creek (HQ-CWF)	Stream Code	3384
NHD Com ID	26294211	RMI	-
Drainage Area	12.6 square miles	Yield (cfs/mi^2)	0.1047
Q_{7-10} Flow (cfs)	1.32 (@0.1047 CFS/sq. mi.)	Q_{7-10} Basis	USGS PA Streamstats
Elevation (ft)	~336.2 Feet (USGS Terrain Mapper)	Slope (ft/ft)	-
Watershed No.	2-C	Chapter 93 Class.	HQ-CWF
Existing Use	-	Existing Use Qualifier	-
Exceptions to Use	-	Exceptions to Criteria	-
Assessment Status	Impaired		
Cause(s) of Impairment	HABITAT ALTERATIONS, SILTATION, SILTATION; Pathogens		
Source(s) of Impairment	AGRICULTURE, AGRICULTURE, URBAN RUNOFF/STORM SEWERS; Unknown		
TMDL Status	-	Name	-

Background/Ambient Data		Data Source
pH (SU)	8.34	Sample ID: 1546488, Sequence Number: 137 Date Collected: 10/28/2010, ~0.18 miles upstream of Outfall No. 001
Temperature (°C)	14.7	See above
Hardness (mg/L)	Undefined	Application information was for NCCW at Outfall No. 001, but this is groundwater/discharge hardness only, not ambient conditions.
Other:	-	-

Nearest Downstream Public Water Supply Intake		NORTH PENN & NORTH WALES WATER AUTH DBA FOREST PARK WATER	
PWS Waters	Delaware River	Flow at Intake (cfs)	-
PWS RMI	-	Distance from Outfall (mi)	>20 miles

Changes Since Last Permit Issuance:

- Stream has been classified as Natural Trout Reproduction stream.
- Outfall coordinates have been updated per NPDES Renewal application.
- Previously assumed 9 CFS stream Q7-10 low flow was determined to be invalid, resulting in proposed new thermal limits. In practical terms, the existing known stream impairments may have masked thermal impacts on aquatic life.

- Outfall No. 007 and 008 (sheet flow/infiltration areas) are defined for IW stormwater permit requirements, but not sampled at this time.

Other Comments:

- Area is 39.35% carbonate per USGS PA Streamstats, consistent with reported NCCW total hardness value (253 mg/l) from site groundwater wells.
- The facility outfalls are upstream of the confluence with the East Branch Monocacy Creek (HQ-CWF; Stream# 3393; impaired due to siltation, pathogens). To the north are agricultural fields. To the south are separate industrial facilities (some with their own IW stormwater permits). To the east is the urban parts of Lower Nazareth Township (outside of Outfall No. 001 drainage area). There are ponds in the area (shown on E-maps/USGS topography), indicating likely historic quarry mining activities. There are businesses southward (downstream) of the facility (aluminum hardware manufacturer, and commercial warehouses).
- Q7-10 Low Flow at Outfall No. 001: Previous low flow assumptions are no longer valid (obsolete correlations likely affected by ceased historic quarrying activities, given pond pits visible via aerial photos and topography). PA Streamstats-values have been used for conservatism:
    - USGS PA Streamstats: Estimated a 1.32 CFS Q7-10 low flow from a 12.6 square mile drainage area, which equates to a 0.1047 CFS/square mile Low Flow Yield. The statewide default LFY is 0.1 CFS/square mile for comparison. The 0.622 MGD discharge is ~72.8% of the receiving stream flow under the calculated Q7-10 low flow conditions.
        - The GW well is shown at approximately the same RMI as Outfall No. 001 by E-maps, i.e. impact on ambient upstream flow is reduced but not calculable. It is assumed that the majority of the upstream drainage area is outside the groundwater drawdown area.
        - There is an upstream quarry (Keystone Cement) assumed to be continuing to pump during low flow conditions (but no low flow discharge rate information is available). Any low flow contribution would be expected to help maintain stream flow.
    - Downstream Gage: There is a downstream USGS Gage No. 01452500 (Monocacy Creek at Bethlehem, PA) with a 44.5 square mile drainage area, elevation of 274.24 Feet, ~7.6 miles downstream of Outfall No. 001. The USGS PA Streamstats application included an estimated 13.2 CFS Q7-10 low flow. This equates to a watershed LFY of 0.2966 CFS/square mile. This watershed LFY value is dubious for several reasons:
        - Groundwater withdrawal: The continuous ~0.622 MGD groundwater withdrawal (for NCCW usage) impacts the local groundwater recharge rates, with restoration of flow at Outfall No. 001 (i.e. impact is not observable at downstream gage).
        - Distance and substantially different drainage areas: The drainage areas nearer the gage are significantly different from the drainage area for Outfall No. 001, which has mainly agricultural area contributions versus conditions in the overall larger gage drainage area, etc. There are quarry discharges upstream of Outfall No. 001, but additional active quarries pumping/discharges to the East Branch Monocacy Creek and otherwise downstream (of Outfall No. 001) that would not contribute to flow at the Outfall No. 001 location.
        - E-maps shows a series of eight (8) dams on the Monocacy Creek itself (between Outfall No. 001 and this USGS Gage) including: Dam Nos. 48-168; 48-172; 48-171; 48-169; 48-170; 48-38, 48-37, and 48-35. Any dam would tend to accumulate stream water during higher flow periods and then release flow until the water level fell below the primary spillway elevation, unless the Dam owners decides on their own to release flow downstream by utilizing the drawdown facility. This might be inflating the Gage's Q7-10 low flow value for upstream areas. All of these dams are currently classified as C-4 Dams (Non-high hazard), without a Dam permit minimum release requirement.
        - The USGS Scientific Report No, 2006-1143 "Simulated Water Budgets and Ground-water/Surface-water Interactions in Bushkill and Parts of Monocacy Creek Watersheds, Northampton County, Pennsylvania – A Preliminary Study with Identification of Data Needs" (Dennis W. Risser) noted that the eastern part of the Monocacy Creek watershed was apparently losing groundwater due to pumping in the eastern adjacent watershed (Schoeneck and Bushkill Creeks) per abstract: "Preliminary results indicated under predevelopment conditions, the divide between the Bushkill and Monocacy Creek ground-water basins may not have been coincident with the topographic divide and as much as 14 percent of the ground-water discharge to Bushkill Creek may have originated from recharge in the Monocacy Creek watershed". This would indicate Monocacy Creek would have lower LFY (groundwater recharge) flows than at the USGS Gage.

Compliance History

DMR Data for Outfall 001 (from May 1, 2024 to April 30, 2025)

Parameter	APR-25	MAR-25	FEB-25	JAN-25	DEC-24	NOV-24	OCT-24	SEP-24	AUG-24	JUL-24	JUN-24	MAY-24
Flow (MGD) Average Monthly	**0.608**	**0.615**	**0.629**	**0.631**	**0.624**	**0.588**	**0.596**	**0.658**	**0.660**	**0.662**	**0.660**	**0.654**
Flow (MGD) Daily Maximum	**0.659**	**0.666**	**0.661**	**0.642**	**0.647**	**0.647**	**0.657**	**0.695**	**0.683**	**0.681**	**0.686**	**0.672**
pH (S.U.) Instantaneous Minimum	7.7	7.7	7.7	7.5	7.7	7.7	7.6	7.7	7.6	7.7	7.7	7.6
pH (S.U.) Instantaneous Maximum	7.8	7.8	7.8	7.9	7.9	7.7	7.8	7.8	7.9	7.8	7.8	7.8
Temperature (Day 1 thru 15) (ºF) Daily Maximum						**58.5**	**59.5**	**59.4**			**57.1**	**57.7**
Temperature (Day 16 thru End of Month) (ºF) Daily Maximum						**58.6**	**58.4**	**58.3**			**59.7**	**57.5**
Temperature (ºF) Daily Maximum	**57.8**	**59.8**	**62.1**	**60.3**	**59.1**				**59.3**	**57.8**		

DMR Data for Outfall 001 (from August 1, 2023 to April 30, 2024)

Parameter	APR-24	MAR-24	FEB-24	JAN-24	DEC-23	NOV-23	OCT-23	SEP-23	AUG-23
Flow (MGD) Average Monthly	**0.641**	**0.638**	**0.597**	**0.639**	**0.636**	**0.630**	**0.630**	**0.633**	**0.638**
Flow (MGD) Daily Maximum	**0.652**	**0.647**	**0.648**	**0.648**	**0.666**	**0.663**	**0.640**	**0.644**	**0.658**
pH (S.U.) Instantaneous Minimum	7.6	7.6	7.6	7.6	7.6	7.5	7.6	7.6	7.5
pH (S.U.) Instantaneous Maximum	7.7	7.6	7.7	7.7	7.6	7.6	7.7	7.7	7.8

Temperature (Day 1 thru 15) (ºF) Daily Maximum						61.5	60.9	60.1	
Temperature (Day 16 thru End of Month) (ºF) Daily Maximum						61	61.9	61.1	
Temperature (ºF) Daily Maximum	61.4	60	59.4	61	58.8				59.3

DMR Data for Outfall 001 (from July 1, 2022 to June 30, 2023)

Parameter	JUN-23	MAY-23	APR-23	MAR-23	FEB-23	JAN-23	DEC-22	NOV-22	OCT-22	SEP-22	AUG-22	JUL-22
Flow (MGD) Average Monthly	**0.639**	**0.643**	**0.616**	**0.638**	**0.640**	**0.640**	**0.639**	**0.655**	**0.650**	**0.641**	**0.641**	**0.643**
Flow (MGD) Daily Maximum	**0.659**	**0.686**	**0.658**	**0.646**	**0.646**	**0.680**	**0.669**	**0.683**	**0.668**	**0.663**	**0.648**	**0.693**
pH (S.U.) Instantaneous Minimum	7.5	7.5	7.5	7.5	7.5	7.5	7.4	7.4	7.4	7.4	7.5	7.5
pH (S.U.) Instantaneous Maximum	7.6	7.6	7.6	7.6	7.6	7.6	7.5	7.5	7.5	7.5	7.6	7.7
Temperature (Day 1 thru 15) (ºF) Daily Maximum	**60.1**	**59.3**						**62**	**62**	**60**		
Temperature (Day 16 thru End of Month) (ºF) Daily Maximum	**62.4**	**58.3**						**62**	**61**	**62**		
Temperature (ºF) Daily Maximum			**61.1**	**60.1**	**59.6**	**59**	**61**				**62**	**61**

DMR Data for Outfall 002 (from May 1, 2024 to April 30, 2025)

Parameter	APR-25	MAR-25	FEB-25	JAN-25	DEC-24	NOV-24	OCT-24	SEP-24	AUG-24	JUL-24	JUN-24	MAY-24
pH (S.U.) Daily Maximum					6.62						6.32	
COD (mg/L) Daily Maximum					103						< 50	
TSS (mg/L) Daily Maximum					**210**						**193**	

Nitrate-Nitrite (mg/L) Daily Maximum					0.267						0.134	
Total Phosphorus (mg/L) Daily Maximum					1.06						0.180	
Total Aluminum (mg/L) Daily Maximum					**1.82**						**1.50**	
Total Iron (mg/L) Daily Maximum					**2.95**						**2.07**	
Total Lead (mg/L) Daily Maximum					**0.00838**						**< 0.00700**	
Total Zinc (mg/L) Daily Maximum					**0.583**						**0.448**	

DMR Data for Outfall 002 (from August 1, 2023 to July 31, 2024)

Parameter	JUL-24	JUN-24	MAY-24	APR-24	MAR-24	FEB-24	JAN-24	DEC-23	NOV-23	OCT-23	SEP-23	AUG-23
pH (S.U.) Daily Maximum		6.32						6.76				
COD (mg/L) Daily Maximum		< 50						< 50				
TSS (mg/L) Daily Maximum		**193**						< 12.5				
Nitrate-Nitrite (mg/L) Daily Maximum		0.134						< 0.0500				
Total Phosphorus (mg/L) Daily Maximum		0.180						0.0626				
Total Aluminum (mg/L) Daily Maximum		**1.50**						0.277				
Total Iron (mg/L) Daily Maximum		**2.07**						0.292				
Total Lead (mg/L) Daily Maximum		< 0.00700						< 0.00700				
Total Zinc (mg/L) Daily Maximum		**0.448**						0.0221				

DMR Data for Outfall 002 (from July 1, 2022 to June 30, 2023)

Parameter	JUN-23	MAY-23	APR-23	MAR-23	FEB-23	JAN-23	DEC-22	NOV-22	OCT-22	SEP-22	AUG-22	JUL-22
pH (S.U.) Daily Maximum	7.49						7.11					
COD (mg/L) Daily Maximum	77.3						< 50.0					
TSS (mg/L) Daily Maximum	11.0						27.1					
Nitrate-Nitrite (mg/L) Daily Maximum	< 0.0500						0.462					
Total Phosphorus (mg/L) Daily Maximum	0.242						0.120					
Total Aluminum (mg/L) Daily Maximum	**< 0.200**						**0.269**					
Total Iron (mg/L) Daily Maximum	**0.786**						**2.68**					
Total Lead (mg/L) Daily Maximum	**< 0.00700**						**< 0.00700**					
Total Zinc (mg/L) Daily Maximum	**0.0399**						**0.134**					

Compliance History

Inspection History:

SITE NAME	INSP PROGRAM	INSP ID	INSPECTED DATE	INSP TYPE	INSPECTION RESULT DESC	# OF VIOLATIONS
FEDCHEM LLC	WPCNP	3962201	4/21/2025	Administrative/File Review*	No Violations Noted	0
FEDCHEM LLC	WPCNP	3550952	04/27/2023	Compliance Evaluation	No Violations Noted	0
FEDCHEM LLC	WPCNP	3375133	06/09/2022	Administrative/File Review	No Violations Noted	0
FEDCHEM LLC	WPCNP	3008234	05/03/2021	Compliance Evaluation**	No Violations Noted	0
FEDCHEM LLC	WPCNP	3185363	01/27/2020	Administrative/File Review	No Violations Noted	0
FEDCHEM LLC	WPCNP	2906567	04/18/2019	Compliance Evaluation	Violation(s) Noted	1

***2022, 2023, and 2024 Annual Reports reviewed.**
****2020 Annual Report reviewed only.**

Other comments:

- Late Application renewal. Admin Extension Letter issued.

Compliance History Review: No open violation per 6/30/2025 WMS query (open violation by client number)

Client ID: 205257
Client: All

Open Violations: 0
No data was found using the criteria entered. Please revise your choices and try again

Development of Effluent Limitations

Outfall No. 001 **Design Flow (MGD)** 0.622
Latitude 40º 41' 30.00" **Longitude** -75º 21' 56.00"
Wastewater Description: Noncontact Cooling Water (NCCW) and Stormwater

Permit limits and/or monitoring requirements: Changes bolded

Parameter	Limit (mg/l unless otherwise specified)	SBC	Model/Basis
Flow	Report MGD Report MGD	Monthly Average Daily Max	Standard reporting requirement.
TSS	**Report**	**IMAX**	**PAG-03 Appendix F parameter with benchmark. Semiannual M&R required.** Application data: <2.55 mg/l - <2.62 mg/l (3 samples)
pH	6.0 – 9.0 SU	Inst. Min - IMAX	Existing Technology limit (Chapter 95.2). Application data: 7.30 – 7.70 SU (396 samples).
Chemical Oxygen Demand (COD)	**Report**	**IMAX**	**PAG-03 Appendix F parameter with benchmark. Semiannual M&R required.** Application data: <50 mg/l max and average (3 samples)
Oil & Grease	**30.0**	**IMAX**	**Technology limit (Chapter 95.2) due to discharge to HQ watershed and site-specific manufacturing of greases. Previous Fact Sheet indicated Oil & Grease remain a parameter of concern as well. Semi-annual M&R required.** Application data, Outfall 002: <4.85 mg/l (1 sample)
Nitrate-Nitrite as N	**Report**	**IMAX**	**PAG-03 Appendix F parameter. Semi-annual M&R required.** Application data: 4.45 mg/l max and 4.01 mg/l average (3 samples)
Total Phosphorus	**Report**	**IMAX**	**PAG-03 Appendix F parameter, Semiannual reporting required.** Application data: 0.162 mg/l max and <0.071 mg/l average (3 samples)
Aluminum, Total	**Report lb/d** **Report lb/d** **Report** **Report**	**Monthly Average** **Daily Max** **Monthly Average** **Daily Max**	**PAG-03 Appendix F parameter, also site-specific manufacturing of aluminum-based constituents. It is therefore an indicator chemical for any potential groundwater contamination and releases. Monthly monitoring.** Application data: No data
Iron, Total	**Report**	**IMAX**	**PAG-03 Appendix F parameter. Semiannual reporting required.** Application data: No data
Lead, Total	**Report**	**IMAX**	**PAG-03 Appendix F parameter. Semiannual reporting required.** Application data: No data
Zinc, Total	**Report**	**IMAX**	**PAG-03 Appendix F parameter. Semiannual reporting required.** Application data: No data

Temperature (deg F) (ºF) Jan 1 - 31	**55.6° (new)** 110° (old)	Daily Max	**New Revised in 4.5 years versus Old Existing thermal limits effective.** Application data: 64° F winter, 62° F Summer (26 samples) 12 months EDMR data: **61**°
Temperature (deg F) (ºF) Feb 1 - 28	**52.4° (new)** 110° (old)	Daily Max	Existing thermal limits 12 months EDMR data: **59.4**°
Temperature (deg F) (ºF) Mar 1 - 31	**70.8° (new)** 110° (old)	Daily Max	**Revised Final versus interim existing thermal limits** 12 months EDMR data: 60°
Temperature (deg F) (ºF) Apr 1 - 15	**73.5° (new)** 110° (old)	Daily Max	**Revised Final versus interim existing thermal limits** 12 months EDMR data: 61.4°
Temperature (deg F) (ºF) Apr 16 - 30	**65.8° (new)** 110° (old)	Daily Max	**Revised Final versus interim existing thermal limits** 12 months EDMR data: 61.4°
Temperature (deg F) (ºF) May 1 - 15	**63.0° (new)** 104° (old)	Daily Max	**Revised Final versus interim existing thermal limits** 12 months EDMR data: 57.7
Temperature (deg F) (ºF) May 16 - 31	**67.0° (new)** 108° (old)	Daily Max	**Revised Final versus interim existing thermal limits** 12 months EDMR data: 57.5°
Temperature (deg F) (ºF) Jun 1 - 15	**68.1° (new)** 92° (old)	Daily Max	**Revised Final versus interim existing thermal limits** 12 months EDMR data: 57.1°
Temperature (deg F) (ºF) Jun 16 - 30	**72.1° (new)** 96° (old)	Daily Max	**Revised Final versus interim existing thermal limits** 12 months EDMR data: 59.7°
Temperature (deg F) (ºF) Jul 1 - 31	**74.3° (new)** 88° (old)	Daily Max	**Revised Final versus interim existing thermal limits** 12 months EDMR data: 57.8°
Temperature (deg F) (ºF) Aug 1 - 31	**72.9° (new)** 84° (old)	Daily Max	**Revised Final versus interim existing thermal limits** 12 months EDMR data: 59.3°
Temperature (deg F) (ºF) Sep 1 - 15	**68.5° (new)** 77° (old)	Daily Max	**Revised Final versus interim existing thermal limits** 12 months EDMR data: 60.1°
Temperature (deg F) (ºF) Sep 16 - 30	**62.5° (new)** 71° (old)	Daily Max	**Revised Final versus interim existing thermal limits** 12 months EDMR data: 61.1°
Temperature (deg F) (ºF) Oct 1 - 15	**57.6° (new)** 67° (old)	Daily Max	**Revised Final versus interim existing thermal limits** 12 months EDMR data: **60.9**°
Temperature (deg F) (ºF) Oct 16 - 31	**53.6° (new)** 63° (old)	Daily Max	**Revised Final versus interim existing thermal limits** 12 months EDMR data: **61.9**°
Temperature (deg F) (ºF) Nov 1 - 15	**49.2° (new)** 62° (old)	Daily Max	**Revised Final versus interim existing thermal limits** 12 months EDMR data: **61.5**°
Temperature (deg F) (ºF) Nov 16 - 30	**46.4° (new)** 72° (old)	Daily Max	**Revised Final versus interim existing thermal limits** 12 months EDMR data: **61**°
Temperature (deg F) (ºF) Dec 1 - 31	**56.5° (new)** 110**°** (old)	Daily Max	**Revised Final versus interim existing thermal limits** 12 months EDMR data: **58.8**°

Comments:

- Updated to PAG-03 Appendix F monitoring requirements, with change to IMAX values (grab sample) and Chapter 95.2 limits for pH & Oil & Grease due to HQ-CWF receiving stream.
- Thermal limits modified to reflect Chapter 93 thermal periods and Thermal Limits output with several months subdivided as needed.

Revised Thermal Limits: The previous NPDES Permit Renewal assumed an inaccurate 9 CFS Q7-10 low flow where USGS PA Streamstats calculated a 1.32 CFS Q7-10 low flow. For a 0.622 MGD discharge, the revised Final permit thermal limits are:

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Thermal Limits Spreadsheet
Version 1.0, April 2024

Instructions | CWF Results | RETURN TO INPUTS | PRINT TO PDF | PRINT CWF

Recommended Limits for Case 1 or Case 2

Semi-Monthly Increment	CWF Target Maximum Stream Temp. (°F)	Case 1 Daily WLA (Million BTUs/day)	Case 2 Daily WLA (°F)
Jan 1-31	38	N/A -- Case 2	55.6
Feb 1-29	38	N/A -- Case 2	52.4
Mar 1-31	42	N/A -- Case 2	70.8
Apr 1-15	48	N/A -- Case 2	73.5
Apr 16-30	53	N/A -- Case 2	65.8
May 1-15	56	N/A -- Case 2	63.0
May 16-31	60	N/A -- Case 2	67.0
Jun 1-15	64	N/A -- Case 2	68.1
Jun 16-30	68	N/A -- Case 2	72.1
Jul 1-31	72	N/A -- Case 2	74.3
Aug 1-15	71	N/A -- Case 2	72.9
Aug 16-31	71	N/A -- Case 2	72.9
Sep 1-15	67	N/A -- Case 2	68.5
Sep 16-30	61	N/A -- Case 2	62.5
Oct 1-15	56	N/A -- Case 2	57.6
Oct 16-31	52	N/A -- Case 2	53.6
Nov 1-15	47	N/A -- Case 2	49.2
Nov 16-30	42	N/A -- Case 2	46.4
Dec 1-31	40	N/A -- Case 2	56.5

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Reasonable Potential Analysis:

- The application only submitted Pollutant Group Table 1 information for the 0.622 MGD NCCW discharge (NCCW water coming from local groundwater). This is allowable when there is no process wastewater being discharged per IW NPDES Application instructions. There is no Pollutant Group Table 2 (metals) data and they have not been monitoring Outfall No. 001 or IMP No. 201 for Appendix F stormwater metals in the previous NPDES Permit term. No TMS modeling is possible in the absence of data.
- There is no known groundwater (source of NCCW) contamination problems at this site, but semi-annual Appendix F constituent (indicators) monitoring plus Oil & Grease (site produces grease products) will be required for the NCCW discharge in the absence of other data.

Anti-Degradation: No additional degradation of the HQ watershed is expected in the absence of any new, additional, or increased loadings (no change to 0.622 MGD NCCW discharge and uncontaminated IW stormwater would not negatively impact the receiving HQ-CWF stream). Implementation of permit conditions with monitoring will prevent any additional degradation. The more stringent thermal limits will address any existing thermal impacts going forward (that might have been masked by non-facility background impairments).

Development of Effluent Limitations

Outfall No.	002 - 006	**Design Flow (MGD)**	0 (stormwater only)
	40º 41' 27.8" (002)		-75º 21' 53.6" (002)
	40º 41' 28.0" (003)		-75º 21' 53.8" (003)
	40º 41' 28.5" (004)		-75º 21' 54.2" (004)
	40º 41' 29.1" (005)		-75º 21' 55.0" (005)
Latitude	40º 41' 29.6" (006)	**Longitude**	-75º 21' 56.0" (006)
Wastewater Description:	Stormwater		

Permit limits and/or monitoring requirements: Changes bolded.

Parameter	Limit (mg/l unless otherwise specified)	SBC	Model/Basis
TSS	Report	IMAX	PAG-03 Appendix F parameter with 100 mg/l benchmark Application data, Outfall 002: 166 mg/l max, 52 mg/ avg. (4 samples) **EDMR data (see above)**: There were two consecutive exceedances of the 100 mg/l TSS benchmarks recently. Higher metal concentrations were concurrently detected.
pH	**6.0 – 9.0** SU	Inst. Min - IMAX	**Technology limit (Chapter 95.2) for existing PAG-03 Appendix F parameter due to discharge to HQ watershed.** Application data, Outfall 002: 7.05 – 7.49 SU (4 samples)
Chemical Oxygen Demand (COD)	Report	IMAX	PAG-03 Appendix F parameter with 120 mg/l benchmark Application data, Outfall 002: 77.3 mg/l max and 56.83 mg/l average (4 samples)
Oil & Grease	**30.0**	**IMAX**	**Technology limit (Chapter 95.2) due to discharge to HQ watershed and site-specific manufacturing of greases due to discharge to HQ watershed.** Previous Fact Sheet indicated Oil & Grease remain a parameter of concern as well. Application data, Outfall 002: <4.85 mg/l (1 sample)
Nitrate-Nitrite as N	Report	IMAX	PAG-03 Appendix F parameter Application data, Outfall 002: TN-TKN: 0.19 mg/l (1 sample)
Total Phosphorus	Report	IMAX	PAG-03 Appendix F parameter Application data, Outfall 002: 0.242 mg/l max and 0.16 mg/l average (4 samples)
Aluminum, Total	Report	IMAX	PAG-03 Appendix F parameter, also site-specific manufacturing of aluminum-based constituents. Application data, Outfall 002: 2.53 mg/l max and 1.00 mg/l average (1 sample)
Iron, Total	Report	IMAX	PAG-03 Appendix F parameter Application data, Outfall 002: 3.61 mg/l max and 2.36 mg/l average (3 samples)
Lead, Total	Report	IMAX	PAG-03 Appendix F parameter

			Application data, Outfall 002: 0.01 mg/l average and 0.00789 mg/l max (3 samples)
Zinc, Total	Report	IMAX	PAG-03 Appendix F parameter Application data, Outfall 002: 0.14 mg/l max and 0.10 mg/l average (3 samples)

Comments:

- Representative Sampling:
  - Inaccessible IMP No. 201 (with ultimate discharge to Outfall No. 001) will not require sampling. Outfall No. 002 is assumed to be representative, with Outfall No. 001 also be sampled semi-annually for stormwater indicator chemicals due to lack of application Pollutant Group 2 metals parameters.
  - The NPDES Permit Renewal Application did not make an adequate case for representative outfalls. Semi-annual sampling will be required in this permit term. Outfall No. 002 (previous assumed representative outfall) also had consecutive EDMR reporting of new TSS benchmark exceedances (and high metal concentrations) that indicate additional BMPs may be required.
- New Sheet flow/Infiltration Outfall Nos. 007 and 008: These newly defined sheet flow/infiltration areas will not require sampling unless there is a spill/leak/release incident not captured by the monitored outfalls within their drainage areas, in which case the Department might require sampling (with sheet flow sampling methodologies described on internet sites). Other IW stormwater requirements (ICP implementation, BMPs) will apply to any industrial activity/material storage in those areas.
- **Stormwater Information:**
  - 2.41 acre IA area (92% impervious) in 5.9 acre total site. Facility uses an Integrated Contingency Plan (ICP) that incorporates PPC Plan requirements.
  - Facility is subject to IW Stormwater General Permit PAG-03 Appendix F (Chemicals and Allied Products) requirements as base, with additional requirements due to discharge to HQ stream.

Outfall/IMP	Area Drained (SF)	Latitude	Longitude	Description
IMP-201* (discharging to Outfall No. 001)	18,843 (previous application info)	40º 41' 29.0"	-75º 21' 56"	Inaccessible monitoring point in Open Pit bottom (ultimate discharge to Outfall 001). Parking lot, loading/unloading area with piping & valving allowing for Northern parking area drainage area. They estimate episodic stormwater at 28,036 GPD.
001	37,885	40º 41' 29.875"	-75º 21' 55.8"	80% impervious; NCCW and IMP-201 flows (northern parking area stormwater) commingled discharge. NCCW sampled/temperature measurement prior to commingling.
002	44,562	40º 41' 27.8"	-75º 21' 53.6"	100% impervious; Parking lot, loading/unloading area, production area dikes**. (Warehouse roof area, lined fire water basin truck loading/unloading, impoundment per Module 1)
003	1,892	40º 41' 28.0"	-75º 21' 53.8"	100% impervious; Paved storage impoundment, production area dike**. (Impoundment and process storage areas per Module 1)
004	9,137	40º 41' 28.5"	-75º 21' 54.2"	86% impervious; Impervious-lined storage impoundment, production area dike** (Impoundment for bulk raw storage, central collection tank areas per Module 1)
005	7,910	40º 41' 29.1"	-75º 21' 55.0"	100% impervious; Paved manufacturing area, production area dike**. (Area surrounding manufacturing, guard shack, offices, boiler/facilities per Module 1)
006	3,862	40º 41' 29.6"	-75º 21' 56.0"	100% impervious; Paved manufacturing area, production area dike and roof drains**. (Area

				surrounding main manufacturing building per Module 1)
007	**-**	40º 41' 28.16"	-75º 21' 56.43"	**Any sheet flow/infiltration area not directed through permitted IW stormwater outfalls (above), on the Monocacy Creek side of plant. This would include any outside container storage.**
008	**-**	40º 41' 28.07"	-75º 21' 54.82"	**Any sheet flow/infiltration area not directed to permitted IW stormwater outfalls (above) on the Keystone Drive side of facility (including plant office and laboratory areas).**

*Inaccessible stormwater effluent point within a pit that commingles with NCCW prior to discharge to Outfall No. 001. IMP-101 monitors NCCW prior to discharge to Outfall No. 001 (located where pipe daylights for discharge into Open Pit where commingling with stormwater occurs).

**"All outfalls have impervious tank dikes which collect stormwater. The drain valves are closed to allow inspection of the stormwater before either release to an outfall or to wastewater central collection tanks. Outfalls are inspected every rain event and data recorded; also, daily visual inspections are completed." The tank farms and all process areas are completely diked with concrete pads or impervious liners. Each drainage area has two (2) manual normally locked/closed quarter-turn butterfly valves that may be operated after inspection. Valve "A" discharges to the stormwater outfalls (Nos. 002 through 006). Valve "B" is used for contaminated wastewater which is directed to central collection tanks for offsite disposal. Dikes inspections are performed after every stormwater event, and on a weekly basis during periods of drought. The ICP indicated qualitative testing of dike-collected water (checking appearance for oil slick or solids; checking for organic chemical odors; check color (for "water white"); checking pH for 6 – 8 SU range; and check for oil using oil test paper) prior to any release to outfalls. If in doubt, the collected water is sample and analyzed for contaminants. An inspection record must be completed and filed for any water release from the dikes. A visual inspection of the dike drainage area for dead grass, white material or other signs of contamination to ensure no previous release were contaminated. In the tanker unloading/loading area, the valve is left open because there is no potential for discharge as no oil is stored in that area unless there is actual loading/unloading (when discharge is sent to the central collection tanks, not outfalls). The Central Collection Tank Area flows are hauled offsite as wastewater (contaminated stormwater or wastewater releases).

<u>4/27/2023 DEP Inspection Report information</u>:

- Stormwater flows by sheet flow and through the collection system in place at the facility. All observed stormdrains were free of debris and useable. The tank and diked areas are lined and rock-covered. Stormwater is collected, held in valve controlled holding areas, and is tested prior to release. All visual observations and valve opening events are logged. If pollutants are found or levels are not correct, the water is piped over to the waste holding tanks. Waste is hauled from the waste holding tanks by third-party haulers to the LCA pre-treatment plant.
- The truck loading/unloading station has a valve-controlled collection system that is routed to the waste holding tanks when loading/unloading is occurring and is routed to the stormwater collection system when no loading/unloading is occurring.
- I was told that all drains inside buildings and around the facility can be routed to the waste holding tanks.
- I was told that no vehicle washing, maintenance, nor refueling occurs at the facility.

<u>PPC Plan-identified BMPs</u>:

- This site has installed impervious containments for the collection of stormwater runoff that could possibly have contact with industrial chemicals. These same containments will intercept the total volume of the largest storage tank in their drainage area in the case of a tank failure. There are no plant areas, other than grassed areas on the perimeter of the facility between the containments and the perimeter fencing, that do not drain to one of the constructed impervious containments. This system also includes a dedicated containment basin for firefighting water collected in the bulk materials warehouse, that can be conveyed to the containment. All containment basins are piped and valved to permit diversion of their contents to the plant central collection system storage for transfer to tanker trucks and treatment off-site under contract.

- It is policy at this site to keep all outlet valves on the secondary containment dikes closed. Stormwater will collect in the dikes and will have to be emptied periodically. In order to determine whether this stormwater is suitable for release to the environment or needs to be sent to central collection, plant personnel must perform the following qualitative tests:
    - Check appearance--if an oil slick or solids are present, do not release to the environment.
    - Check odor--if sample smells of organic chemicals, do not release to the environment.

- Check color--if sample is not water white, do not release to the environment.
- Check pH using pH dip stick – if not between 6-8, do not release to the environment.
- Check for oil using oil test paper – if any oil present, do not release to the environment.

If there is any doubt of the suitability of the stormwater for release, then plant personnel must sample it and have the lab analyze it for contaminants. If the lab approves, the water can then be released.

Anti-Degradation: No additional degradation of the HQ watershed is expected in the absence of any new, additional, or increased loadings in the uncontaminated stormwater discharges. Implementation of permit conditions (monitoring, stormwater BMPs, PPC Plan requirements, etc.) will prevent any additional degradation.

Communications Log:

- **8/3/2023: On-Base# 117625**
- **8/8/2023:** Incompleteness Letter issued, response due on 9/8/2023.
- **8/17/2023:** Telephone call from consultant (Shannon Busby, CES). They may ask for more time due to need for sampling & analysis and getting a PA PE to seal their PPC Plan. They asked for basis of sampling requirements, etc,, (from application instructions). They asked about ND reporting and I explained the EPA Sufficiently Sensitive Rule and TQLs found in Application instructions. I explained that we number internal monitor points differently from discharging outfalls and that it mattered in terms of differentiating stormwater from NCCW discharges. If monitored from same outfall, then the stormwater and NCCW will have to be monitored separately.
- **8/18/2023:** Consultant (Shannon Busby) E-mail asking for extension to allow for required sampling.
- **8/21/2023:** DEP (Berger) E-mail granting extension to 11/8/2023 for revised application.
- **11/7/2023: On-Base# 129049 (revised application)**
- **11/8/2023:** Applicant (CES) E-mail noting OnBase submittal was lacking copies of email receipts for the notification letters sent to Nazareth and Northampton (and proof of receipt). E-mail attachments.
- **11/8/2023:** DEP (Berger) E-mail noting that the missing documentation must be submitted by On-Base as DEP no longer accepts e-mail permit documents by policy.
- **11/8/2023:** Applicant (Shannon Busby) E-mail acknowledging receipt of 11/8/2023 DEP E-mail.
- **11/8/2023:** Applicant (Lindsey Adams, CES) E-mail with link to greenport. Nothing opened.
- **11/8/2023:** DEP (Berger) E-mail requiring On-Base submittal to Lindsey Adams. “Greenport is not used for NPDES permit applications and the link did not work when tried”.
- **11/8/2023:** Autoreply received from Adams: “I will be away from the office until Friday, March 24”.
- **1/2/2024:** Applicant (Shannon Busby) E-mail asking on application status
- **1/12/2024: Admin Extension Letter issued.** Will defer further investigation about EIN number change to technical review stage. Will request On-Base copy of public comment letter/response in technical review. (No On-base version received to date).
- **1/17/2024:** Applicant (Shannon Busby) left voice-mail message with Mr. Patrick Musinski about late application.
- **1/17/2024:** Called Shannon Busby back and explained Administrative Extension Letter language. Letter was issued to make sure NPDES Permit did not expire on 1/31/2024 at midnight. Application was incomplete on 8/4/2023. They did not meet the 8/8/2023 DEP Incompleteness Letter language deadline for automatic extension. Other extension e-mail granted more time but did not extend the permit or prevent potential compliance action. The Admin Ext Letter (from permitting section) did not waive DEP rights to take any compliance action for a late application. Mr. Busby said he would submit Act 14 documentation by On-Base for the public record. Mentioned that I might be seeking further clarification on the EIN number issue in the technical review stage. Mentioned that FEDCHEM LLC was not found on the PA Department of State website as a registered business, so they might need to check to see if they have do something to meet Department of State registration requirements.
- **9/16/2024:** Tech Def Letter issued
- **9/30/2024:** FEDCHEM (Mr. Porcino) called and indicated that they were changing consultants and would be requesting a 60-day extension. Extension given due to new consultant (to 12/16).
- **10/7/2024:** Met briefly with their new engineer (Guziek) and discussed Tech Def Letter requirements (Antideg Module requirements; thermal impacts; IW stormwater permitting requirements including sampling and PPC plan requirements; line drawing with water balance). He indicated that he understood the issues. He would be going to the FEDCHEM plant and will be doing a DEP File review to gather information. He knows the DEP water quality models including Thermal Spreadsheet is available via DEP Water Quality Models & Tools webpage. He knows that they should also be contacting the DRBC about changes in well water withdrawal rates and discharge rates (from previous DRBC docket information) in terms of DRBC Docket requirements. He indicated they would submit a revised application.
- **12/12/2024**: **Public Upload# 275588 and 276555 (12/12/2024)**. DRBC indicated DRBC docket renewal application received on 6/4/2025.
- **12/16/2024: Public Upload# 277182** (revised NPDES Permit application page 3 resubmittal)