

Application Type Renewal
Facility Type Industrial
Major / Minor Minor

**NPDES PERMIT FACT SHEET
ADDENDUM**

Application No. PA0044920
APS ID 615766
Authorization ID 1199575

Applicant and Facility Information

Applicant Name	<u>Blew Enterprises Inc. FKA Lehighton Electronics Inc.</u>	Facility Name	<u>Lehighton Electronics</u>
Applicant Address	<u>517 North 9th Street Lehighton, PA 18235</u>	Facility Address	<u>15 Blakeslee Boulevard (Route 443) (Seneca Road/SR 443) Lehighton, PA 18235</u>
Applicant Contact	<u>Austin R. Blew</u>	Facility Contact	<u>Austin R. Blew (second alternate contact identified below)</u>
Applicant Phone	<u>(610) 377-7363 or 570-657-6829</u>	Facility Phone	<u>(610) 377-7363 or 570-657-6829</u>
Client ID	<u>81320</u>	Site ID	<u>250631</u>
SIC Code	<u>3625, 3822</u>	Municipality	<u>Mahoning Township</u>
SIC Description	<u>Manufacturing - Environmental Controls, Manufacturing - Relays And Industrial Controls</u>	County	<u>Carbon</u>
Date Published in PA Bulletin	<u>January 18, 2020</u>	EPA Waived?	<u>Yes</u>
Comment Period End Date	<u>March 5, 2020</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>Application for a renewal of an NPDES permit for discharge of treated Industrial</u>		

Internal Review and Recommendations

This Redraft NPDES Permit is for discharge of treated groundwater to the waters of the Commonwealth from an inactive industrial facility (Blew Enterprises LLC FKA Lehighton Electronics Inc.) undergoing RCRA No. PAD002399186 clean-up (pump & treat VOCs in groundwater including Trichloroethylene (TCE)).

A Redraft NPDES Permit was required due to age of draft NPDES permit and changes to standard permit conditions (including annual fees).

Changes from Previous Draft NPDES Permit:

- **Signature Page:** Permittee name change incorporated per request.
- **Parts A and B:** The standard NPDES Permit Template conditions have been updated.
- **Part A:** Minimum monitoring has been adjusted to "monthly when discharging" to address proposal for temporary cessation of groundwater pump & treat and incorporation of an O&M Plan into the NPDES Permit Renewal Application.
- **Part C:** Minor editing for clarification purposes.

Public Comments: Summarized public comments and DEP responses (bolded):

Approve	Return	Deny	Signatures	Date
X			James D. Berger (signed) James D. Berger, P.E. / Environmental Engineer	November 19, 2021
X			Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Environmental Engineer Manager	11-22-21
NA			NA – not needed for Redraft NPDES Permit. Bharat Patel, P.E. / Environmental Program Manager	NA

Internal Review and Recommendations

Request for Extension of Public Comment Period (February 17, 2020) for Draft NPDES Permit: Granted until March 5, 2020. The Redraft NPDES Permit has its own public comment period as set forth in the Redraft NPDES Permit Cover Letter.

Permittee Name Change: The 2/17/2020 Applicant (Schoenberger) Letter indicated a name change to Blew Enterprises Inc. with an NPDES Permit amendment form being separately submitted. The 3/5/2020 Applicant (Schoenberger) Letter indicated a minor NPDES permit amendment form with the name change would be separately submitted. The subsequently received 3/9/2020 NPDES Permit Amendment form indicated a different Federal Employer Identification Number (EIN) # 23-2765054 which indicated a different legal entity than the original Leighton Electronics Inc. (EIN# 23-1717786). The 11/1/2021 Applicant (EarthRes Group) Letter indicated Blew Enterprises Inc. retained the original Leighton Electronics Inc. EIN Number and that the PA Department of State Corporation Website included the name change for Leighton Electronics Inc. The 11/1/2021 Permittee (EarthRes Group) Letter clarified the correct EIN Number for Blew Enterprises Inc. (EIN Number 23-1717786) and noted the PA Department of State Corporate Webpage included the name change from Leighton Electronics Inc. to Blew Enterprises Inc. **The name change has been incorporated into this Redraft NPDES permit.**

Request to Cease Groundwater Pump & Treat System/NPDES Permit Termination: The 11/1/2021 Permittee (EarthRes Group) Letter indicated the facility was seeking permission to cease all site cleanup groundwater pump & treat activities and stated there was no need for an NPDES Permit upon cessation.

- **Request for concurrence with permanent Pump & Treat Cessation:**
 - This request is outside the scope of the DEP Clean Water Program which does not have jurisdiction over the site cleanup project.
 - The permittee will have to directly contact the US EPA and copy the DEP Waste Management and Environmental Cleanup Programs regarding any request for temporary or permanent cessation of site groundwater pump & treat. This was communicated to the consultant (EarthRes Group) in an 11/18/2021 DEP (Berger) E-mail.
 - See NPDES Permit Part C.II.A for start-up sampling requirements following a temporary shutdown period (which was a previously discussed scenario).
- **Request for NPDES Permit Termination:** The request is premature. After the US EPA concurs in writing that site groundwater pump & treat can permanently cease, the permittee can submit the NPDES Permit Termination Form (with written EPA concurrence regarding permanent cessation plus groundwater pump & treat system decommissioning plan attached) to terminate the NPDES Permit. If prematurely terminated, new NPDES Permit application fee requirements, public notice requirements, etc. might pertain if pumping had to restart. The Department is proceeding with normal the NPDES Permit renewal process. See also NPDES Permit Part B.I.G (Termination of Permit Coverage) and Part C.II.D.

Site and Client Contact Updating: DEP requested updated site contact information by 11/17/2021 (Berger) e-mail as information indicated the previous site contact information was obsolete. Beth Blew called back on 11/17/2021. Mr. Blew (client contact) was not presently available due to medical issues. She indicated that the previous site contact had quit, and that there is no one onsite (with buildings having been removed). She asked if Mr. Blew could be the site contact. She indicated she could function as a back-up site contact for Leighton Electronics (NPDES Permit No. PA0044920, Mahoning Township, Carbon County) for a few weeks. Her telephone number (Canadian) is 250-878-0573 and her e-mail address is: Beth Blew bblew7@outlook.com. On 11/18/2021 Ms. Blew indicated Matt Cordes has agreed to be the second site contact (if Mr. Blew is not available). His cell number is (570) 556-8832. His e-mail address is matt@writingworksltd.com. **DEP E-facts has been updated for Mr. Blew to be the site contact with Mr. Cordes identified as an alternate site contact.**

- **Future Changes:** If the client or site contact(s) change in the future (or contact information changes), it is the responsibility of the permittee to notify the Department and provide updated contact information at that time.
- **Two different telephone numbers were identified for the Client Contact (Mr. Austin Blew):** 570-657-6829 (NPDES Name Change form) and previous 2/17/2020 Letter (610-377-7363). It is unclear which is preferred.
- **O&M Plan Contacts:** The March 5, 2020 "Operating and Maintenance Plan" included obsolete site contact/part-time operator information with designated responsibilities to a presently unidentified "operator" (with EDMR reporting responsibilities) and Engineer. The O&M contact information must also be updated as needed.

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Requested Change in Proposed Minimum Monitoring Frequencies: The permittee initially requested sampling continue every 2 months per previous permit (not the proposed 2/month sampling frequency) in the 2/17/2020 Letter. The 3/5/2020 Letter requested only quarterly monitoring. The permittee indicated the carbon canisters would have an expected 9 – 12 month life. They originally proposed to replace the carbon canister No. 1 every six months with flow reversal after replacement. The permittee then indicated its belief that the previously monitoring was effective, except during an interim period when no one replaced a former site contact (who had died). The permittee objected to the costs due to limited resources to address remaining clean-up costs. Other provided information:

- The 2/17/2020 Applicant (Schoenberger) Letter indicated the carbon canister system had been repaired or upgraded: Replacement of the carbon shell to replace corroded and non-functioning internal components; piping alterations to facilitate O&M and relocated internal sampling ports; replacement of powdered carbon with granulated carbon. Work completed.
- The permittee noted the discharge quality changed in 2000, when all printed circuitry production ceased and groundwater clean-up commenced. All TCE discharge were below the 50 ppb NPDES permit limit. They noted the only issue was the need to replace carbon canisters when less than 50% of raw TCE concentration was removed. The subsequent 3/5/2020 Permittee (Schoenberger) Letter amplified on the history of this site and clean-up activities, noting the replacement carbon canisters have twice the carbon capacity of previous canisters.
- O&M Plan: An “Operations and Maintenance Plan” was included in the March 5, 2020 Letter to support reduced monitoring requirements that included:
 - Part-time Operator Responsibilities (obsolete reference to previous site contact): 2/week visits by a part-time operator (when pumping/discharging) to assure:
 - Pump is operational
 - Two Canister Activated Carbon Adsorption System (with three sampling points: raw groundwater influent (Outfall/IMP No. 101), sampling point between canisters, and effluent sampling point (Outfall No. 001) has flow
 - Adjust flow rate to 5 GPM (50,000 Gallons per week)
 - Verify and record flow quantity.
 - File DMR reports
 - Sampling Responsibilities: When compliance monitoring is required, a lab (Hawk Mountain initially) will be contacted to perform the actual sampling and laboratory analysis (raw/untreated groundwater, flow between the carbon canisters in series, and treated effluent). The lab will submit analytical results to the part-time operator, Austin Blew (client contact), and their Engineer (unidentified).
 - Engineer Responsibilities (identified as Dr. Schoenberger): Engineer evaluation of analytical results. When the removal of TCE in the first in series carbon column falls below 50%, the carbon in that canister requires replacement. The Engineer notifies Moyer Well Drilling to replace the carbon in Column No. 1, with the flow system reversed with the newly regenerate column becoming the second in the series. The Engineer maintains records of analytical dates, results and dates when repairs are completed. Blew Enterprises Inc. will maintain copies of all permanent records.

The Department can only grant this request in part. The Department has modified the minimum monitoring frequency to “monthly when discharging” to address proposed temporary cessation of discharges and minimum monitoring frequencies. Please note the NPDES Permit conditions supersedes any O&M Plan in event of any conflict. Applicable requirements include:

- NPDES Permit Part A.III (Self-Monitoring, Reporting and Recordkeeping): See permittee responsibilities. They cannot be deferred to third party engineers or hired operators.
- NPDES Permit Part A.III.B.7: If additional monitoring is done, it must be reported in the DMR/EDMR reporting.
- NPDES Permit Part C.I.F: “In event that the facility does not achieve a minimum 50% reduction of TCE (based on direct comparison of Internal Monitoring Point No. 101 (raw groundwater) to Outfall No. 001 (treated groundwater effluent)), the permittee shall replace the carbon filters. The DMR comment section shall report this fact and date of sampling.” This condition would require replacement of both carbon canisters if the 50% reduction requirement is not met by the site effluent.
 - Please note the EPA Sufficiently Sensitive Rule requires the Department to treat any insensitive non-detect level (not meeting the DEP Target Quantitation Limits) as the constituent being present at the insensitive non-detect concentration. The DEP Target Quantitation Limits can be found in the IW

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NPDES Permit Application Instructions. If non-detect at below the DEP Target QL, the Department would consider the constituent to be absent.

- The 50% TCE reduction requirement is an original design narrative Technology-based Effluent Limit (TBEL) incorporated into the NPDES Permit. Please note that a new replacement groundwater treatment system would likely be subject to more stringent TBELs.
- The condition specifies replacement of **both** carbon filters (whether canisters or columns), not just one in event of failure to achieve 50% reduction after treatment by **both** carbon canisters. It would not be triggered if only one carbon canister did not achieve 50% reduction.

Compliance History: Four open violations per 11/19/2021 WMS Query (Open Violations by Client Number):

FACILITY	VIOLATION ID	VIOLATION DATE	VIOLATION CODE	VIOLATION
LEHIGHTON ELECTRONICS	878463	02/10/2020	92A.61(C)	NPDES - Failure to monitor pollutants as required by the NPDES permit
LEHIGHTON ELECTRONICS	936747	11/15/2021	92A.41(A)10C	NPDES - Failure to collect representative samples
LEHIGHTON ELECTRONICS	936748	11/15/2021	92A.41(A)12B	NPDES - Failure to submit monitoring report(s) or properly complete monitoring reports
LEHIGHTON ELECTRONICS	936758	11/15/2021	92A.41(A)5	NPDES - Failure to properly operate and maintain facilities which are installed or used by the permittee to achieve compliance