pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southeast Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0052272**
Facility Type	**Industrial**	APS ID	**1100659**
Major / Minor	**Minor**	Authorization ID	**1461347**

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

Applicant and Facility Information

Applicant Name	**Henry Co.**	Facility Name	**Henry Kimberton Facility**
Applicant Address	336 Coldstream Road	Facility Address	336 Cold Stream Road PO Box 368
	Phoenixville, PA 19460-4788		Kimberton, PA 19442
Applicant Contact	Matthew Stofko	Facility Contact	Matt Stofko
Applicant Phone	(484) 923-2313	Facility Phone	(484) 923-2313
Client ID	135695	Site ID	1900
SIC Code	2952	Municipality	East Pikeland Township
SIC Description	Manufacturing - Asphalt Felts And Coatings	County	Chester
Date Application Received	October 23, 2023	EPA Waived?	Yes
Date Application Accepted		If No, Reason	
Purpose of Application	Renewal		

Summary of Review

The permittee is requesting approval for a renewal National Pollutant Discharge Elimination System (NPDES) individual permit to discharge 9,000 gallons per day (gpd) of treated groundwater used for noncontact cooling and industrial stormwater to an Unnamed Tributary (UNT) to French Creek. At point of discharge, an UNT is intermittent stream. The secondary water is French Creek, which is classified as Trout Stocking, Migratory Fishes (TSF, MF).

The Henry Company is a manufacturer of protective coatings. Henry Company blends raw materials (e.g. asphalt, petroleum waxes, solvents, limestone, clay, and other solids) to form various solvent based and water-based products such as driveway sealer and roofing content. The products are packaged and shipped by truck in various sizes from a quart to bulk loads.

Groundwater is pumped from the production well and used as non-contact cooling water for heat exchangers. The non-contact cooling water is then pumped through a gas phase separation (air stripping) tower prior to being discharged through Outfall 001.

This facility contains 3 outfalls, outfall 001 discharges approximately 9,000 gpd of non-contact cooling water treated by an air stripper to remove VOCs before discharge, the other two outfalls (009 and 010) are for stormwater discharge.

Outfall 009 has drainage area of 9,900 ft^2 of impervious surface. Outfall 010 has drainage are of 18,650 ft^2 of impervious surface. The activities that take place within both drainage areas is finished products such as asphalt emulsions are pumped into tanker trucks at the loading spots near drainage grates that drain to outfall 009. The storage tanks are located either indoors or in an impervious diked area, and the first valve in the loading line is at the tan connection, i.e., either indoors or within the diked area. Hose disconnects are connected over metal or plastic collection pans, and all collected product is recycled to the manufacturing process. Some non-bulk raw materials and bulk limestone are handled in part of the area of outfall 010.

Approve	Deny	Signatures	Date
x		*Vasantha* Vasantha Palakurti / Environmental Engineering Specialist	February 21, 2024
X		*Pravin Patel* Pravin C. Patel, P.E. / Environmental Engineer Manager	02/21/2024

Summary of Review

The permittee operates a CERCLA air stripper at this site. The unit is permitted by U.S. EPA under CERCLA to discharge up to 250,000 gpd. The discharge point for this stripper is approximately 50 feet upstream of the PADEP permitted discharge. This site is a superfund site for TCEs and it is permitted by EPA with EPA ID: PAD980691703. The permittee disclosed that the effluent concentration of TCE from the U.S. EPA air stripper is < 0.08 ppb. The contamination at this site occurred under previous owner were waste disposed in the lagoons contaminated the soils in the lagoon area, permeated into the groundwater, and contaminated groundwater discharged to local creeks.

Since there are no changes in process, waste characteristics as well as receiving stream designation, all existing limits are carried over in this renewal.

An inspection of the site was last conducted July 17, 2023 by a Water Quality Specialist and no violations were noted.

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	Design Flow (MGD)	.009
Latitude	40Âº 7' 51.26"	Longitude	-75Âº 34' 31.10"
Quad Name		Quad Code	
Wastewater Description:	Noncontact Cooling Water (NCCW)		
Receiving Waters	Unnamed Tributary to French Creek	Stream Code	01555
NHD Com ID	25980236	RMI	0.5800
Drainage Area	1.52 mi^2	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	0.283	Q_{7-10} Basis	PA StreamStats
Elevation (ft)	291.6	Slope (ft/ft)	
Watershed No.	3-D	Chapter 93 Class.	TSF, MF
Existing Use	**None**	Existing Use Qualifier	N/A
Exceptions to Use	None	Exceptions to Criteria	N/A
Assessment Status	Attaining Use(s)		
Cause(s) of Impairment			
Source(s) of Impairment			
TMDL Status		Name	

Changes Since Last Permit Issuance: There were no process changes since last renewal.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	009, 010	Design Flow (MGD)	0
Latitude	40Âº 7' 51.32"	Longitude	-75Âº 34' 30.25"
Quad Name		Quad Code	
Wastewater Description:	Stormwater		
Receiving Waters	Unnamed Tributary to French Creek	Stream Code	01555
NHD Com ID	25980236	RMI	0.5700
Drainage Area	1.52 mi^2	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	0.283	Q_{7-10} Basis	PA StreamStats
Elevation (ft)	291.6	Slope (ft/ft)	
Watershed No.	3-D	Chapter 93 Class.	TSF, MF
Existing Use	**None**	Existing Use Qualifier	N/A
Exceptions to Use	None	Exceptions to Criteria	N/A
Assessment Status	Attaining Use(s)		
Cause(s) of Impairment			
Source(s) of Impairment			
TMDL Status		Name	

Changes Since Last Permit Issuance: There were no process changes since last renewal.

Compliance History

DMR Data for Outfall 001 (from October 1, 2022 to September 30, 2023)

Parameter	SEP-23	AUG-23	JUL-23	JUN-23	MAY-23	APR-23	MAR-23	FEB-23	JAN-23	DEC-22	NOV-22	OCT-22
Flow (GPD) Average Monthly	12299	11725	15973	13288	14568	16553	15867	38203	12293	12732	13316	9117
pH (S.U.) Instantaneous Minimum	7.26	7.57	7.38	7.62	7.52	7.52	7.58	7.45	7.42	8.13	8.13	7.61
pH (S.U.) Instantaneous Maximum	7.26	7.57	7.38	7.62	7.52	7.52	7.58	7.45	7.42	8.13	8.13	7.61
Temperature (ºF) Instantaneous Maximum	84.02	83.66	83.48	70.88	87.62	87.62	87.08	85.28	84.74	65.48	65.48	84.92
Trichloroethylene (mg/L) Average Monthly	< 0.001	< 0.001	< 0.001	< 0.001	0.001	< 0.001	0.0006	< 0.001	0.00237	< 0.001	< 0.001	< 0.001
Trichloroethylene (mg/L) Industrial Influent Average Monthly	0.0024	0.00156	0.0018	0.00134	0.00233	0.0023	< 0.001	0.00135	0.00445	0.00173	0.00173	0.00181
Trichloroethylene (mg/L) Daily Maximum	< 0.001	< 0.001	< 0.001	< 0.001	0.001	< 0.001	0.0006	< 0.001	0.00237	< 0.001	< 0.001	< 0.001
Trichloroethylene (mg/L) Industrial Influent Daily Maximum	0.0024	0.00156	0.0018	0.00134	0.00233	0.0023	< 0.001	0.00135	0.00445	0.00173	0.00173	0.00181

DMR Data for Outfall 009 (from October 1, 2022 to September 30, 2023)

Parameter	SEP-23	AUG-23	JUL-23	JUN-23	MAY-23	APR-23	MAR-23	FEB-23	JAN-23	DEC-22	NOV-22	OCT-22
pH (S.U.) Instantaneous Maximum				7.16						7.62		
TSS (mg/L) Instantaneous Maximum				< 2.5						< 24.2		

Oil and Grease (mg/L) Instantaneous Maximum				< 1.36						< 1.45		
Dissolved Iron (mg/L) Instantaneous Maximum				0.021						< 0.02		
Phenol (mg/L) Instantaneous Maximum				0.00831						< 0.08		

DMR Data for Outfall 010 (from October 1, 2022 to September 30, 2023)

Parameter	SEP-23	AUG-23	JUL-23	JUN-23	MAY-23	APR-23	MAR-23	FEB-23	JAN-23	DEC-22	NOV-22	OCT-22
pH (S.U.) Instantaneous Maximum				6.85						7.48		
CBOD5 (mg/L) Instantaneous Maximum				< 0.003						0.00942		
COD (mg/L) Instantaneous Maximum				< 11.7						76.9		
TSS (mg/L) Instantaneous Maximum				< 2.5						25.6		
Oil and Grease (mg/L) Instantaneous Maximum				< 1.26						1.63		
TKN (mg/L) Instantaneous Maximum				< 0.14						0.778		
Total Phosphorus (mg/L) Instantaneous Maximum				< 0.035						0.12		
Dissolved Iron (mg/L) Instantaneous Maximum				< 0.02						< 0.02		

Compliance History

Effluent Violations for Outfall 001, from: November 1, 2022 To: September 30, 2023

Parameter	Date	SBC	DMR Value	Units	Limit Value	Units
Trichloroethylene	01/31/23	Avg Mo	0.00237	mg/L	.001	mg/L
Trichloroethylene	01/31/23	Daily Max	0.00237	mg/L	.002	mg/L

Development of Effluent Limitations

Outfall No. 001 **Design Flow (MGD)** .009
Latitude 40º 7' 39.00" **Longitude** -75º 34' 40.00"
Wastewater Description: Noncontact Cooling Water (NCCW)

Water Quality-Based Effluent Limitations (WQBEL)

Best Professional Judgment (BPJ) Limitations

Parameter	Effluent Limitations Concentration (mg/l)			Monitoring Frequency
	Average Monthly	Daily Maximum	Inst. Maximum	
Trichloroethylene (Influent)	Report	Report	Report	1/month
Trichloroethylene (Effluent)	0.001	0.002	0.0025	1/month
Temperature (°F)			110°	1/month

Toxic Screening Analysis

Toxic modeling was performed by using DEP's Toxics Management Spreadsheet (TMS) for the sample results submitted in the permit application and additional Laboratory Analytical Report. TMS indicated that no additional WQBEL are required. Therefore, current limits for TCE will be continued in this renewal.

Development of Effluent Limitations

Outfall No. 009 and 010 **Design Flow (MGD)** 0
Latitude 40º 7' 36.00" **Longitude** -75º 34' 39.00"
Wastewater Description: Stormwater

Parameters in outfall 009 and 010 have been updated to be consistent in this permit as the activities in drainage area exposed to precipitation are similar in nature.

As per the application, the activities that take place within both drainage areas (Outfall 009 and 010) are finished products such as asphalt emulsions pumped into tanker trucks at the loading spots near drainage grates that drain to outfall 009. The storage tanks are located either indoors or in an impervious diked area, and the first valve in the loading line is at the tan connection, i.e., either indoors or within the diked area. Hose disconnects are connected over metal or plastic collection pans, and all collected product is recycled to the manufacturing process. Some non-bulk raw materials and bulk limestone are handled in part of the area of outfall 010.

Parameter	Minimum Measurement Frequency
pH (S.U.)	1/6 months
COD	1/6 months
TSS	1/6 months
Oil and Grease	1/6 months
Dissolved Iron	1/6 months
Phenol	1/6 months
Total Phosphorus	1/6 months
Toal Nitrogen	1/6 months

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" (386-0400-001), SOPs and/or BPJ.

Outfall 001, 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		
Flow (GPD)	Report	XXX	XXX	XXX	XXX	XXX	1/month	Measured
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/month	Grab
Temperature (ºF)	XXX	XXX	XXX	XXX	XXX	110	1/month	I-S
Trichloroethylene	XXX	XXX	XXX	0.001	0.002	0.0025	1/month	Grab
Trichloroethylene Industrial Influent	XXX	XXX	XXX	Report	Report	XXX	1/month	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" (386-0400-001), 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	Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	XXX	Report	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	XXX	Report	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	XXX	Report	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	XXX	Report	1/6 months	Grab
Dissolved Iron	XXX	XXX	XXX	XXX	XXX	Report	1/6 months	Grab
Phenol	XXX	XXX	XXX	XXX	XXX	Report	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	XXX	Report	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	XXX	Report	1/6 months	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" (386-0400-001), SOPs and/or BPJ.

Outfall 010, 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		
pH (S.U.)	XXX	XXX	XXX	XXX	XXX	Report	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	XXX	Report	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	XXX	Report	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	XXX	Report	1/6 months	Grab
Dissolved Iron	XXX	XXX	XXX	XXX	XXX	Report	1/6 months	Grab
Phenol	XXX	XXX	XXX	XXX	XXX	Report	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	XXX	Report	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	XXX	Report	1/6 months	Grab