

Application Type Renewal  
Facility Type Industrial  
Major / Minor Minor

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

Application No. PA0054402  
APS ID 1008149  
Authorization ID 1299605

**Applicant and Facility Information**

Applicant Name	<u>Emerson Electric Co.</u>	Facility Name	<u>Brooks Instrument GWCU</u>
Applicant Address	<u>8000 West Florissant Avenue</u> <u>St Louis, MO 63136</u>	Facility Address	<u>407 W Vine Street</u> <u>Hatfield, PA 19440-3052</u>
Applicant Contact	<u>Stephen Clarke</u>	Facility Contact	<u>Patrick Finnegan</u>
Applicant Phone	<u>(314) 553-2962</u>	Facility Phone	<u>(215) 362-3547</u>
Client ID	<u>41401</u>	Site ID	<u>452415</u>
SIC Code	<u>3824</u>	Municipality	<u>Hatfield Borough</u>
SIC Description	<u>Manufacturing - Fluid Meters And Counting Devices</u>	County	<u>Montgomery</u>
Date Application Received	<u>December 2, 2019</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**

Applicant requests renewal of an NPDES permit to discharge treated groundwater from a pump and treat remediation system that has been operating at the site since 1980 to address volatile organic compounds (VOCs), specifically trichloroethylene (TCE) and tetrachloroethylene (PCE), in bedrock groundwater.

The remediation system currently consists of two recovery wells which pump groundwater to an air stripper and the treated groundwater then discharged to the onsite stormwater retention pond via Outfall 001. Well MW-2 continuously pumps groundwater at a rate of 5 to 6 gpm. Well RW-2 continuously pumps groundwater at a rate of 1 to 3 gpm. The stormwater retention pond discharges to an unnamed tributary to the West Branch of Neshaminy Creek via a storm sewer.

Emerson sold this site in 2007 and the site is currently owned and operated by Brooks Instrument LLC. Although the plant was sold, Emerson retains ownership of and responsibility for the groundwater system. The site owner, Brooks Instrument LLC holds the stormwater No Exposure Certification No. NOEXSE200 for the stormwater discharge.

Since the discharge is to a stormwater basin that is normally dry, drinking water standards were applied as NPDES permit limits: Tetrachloroethylene = 0.005 mg/l, Trichloroethylene = 0.005 mg/l. Existing limits are carried over to the new permit. Review shows the facility has been in compliance with the NPDES permit limits and discharge flow is much less than the permitted 36,000 gpd flow.

Monitoring frequencies of TCE and PCE are changed to quarterly according to the permittee's request. Monthly monitoring is required for flow and pH.

The remediation is being conducted according to the Act 2 Program. The current groundwater monitoring requirement is carried over to the new permit. DEP Environmental Cleanup Program expressed concerns about various other compounds identified in recent groundwater samples collected from monitoring wells within the likely capture area. Based on this fact we

Approve	Deny	Signatures	Date
X		<i>Sara Abraham</i> Sara Reji Abraham, E.I.T. / Project Manager	05-04-2020
X		<i>Pravin Patel</i> Pravin C. Patel, P.E. / Environmental Engineer Manager	05/04/2020

**Summary of Review**

request the permittee to submit a full scan of Volatile Organic Compounds of influent and effluent with the next renewal application for review.

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:

Hatfield Borough - November 16, 2019  
Hatfield Township - November 16, 2019  
Montgomery County - November 16, 2019

Permit Conditions:

- A. Acquire Necessary Property Rights
- B. Proper Sludge Disposal
- C. BAT/BCT Reopener
- D. Dry Stream Discharge
- E. Groundwater Monitoring
- F. Annual Groundwater Report
- G. No Stripper Tower Wastewater
- H. Continuous Operation

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	<u>001</u>	Design Flow (MGD)	<u>.036</u>
Latitude	<u>40° 16' 30.81"</u>	Longitude	<u>-75° 17' 57.99"</u>
Quad Name	<u>Telford</u>	Quad Code	<u>1643</u>
Wastewater Description: <u>Groundwater Cleanup Discharge</u>			
Receiving Waters	<u>Unnamed Tributary to West Branch Neshaminy Creek (WWF, MF)</u>	Stream Code	<u>02868</u>
NHD Com ID	<u>25484726</u>	RMI	<u>6.5</u>
Watershed No.	<u>2-F</u>	Chapter 93 Class.	<u>WWF, MF</u>
Assessment Status	<u>Not Assessed</u>		

Other Comments: The listed Stream Code and RMI is for the West Branch Neshaminy Creek. The receiving tributary to West Branch Neshaminy Creek is not listed in the Pennsylvania Gazetteer of Streams.

**Compliance History**

**DMR Data for Outfall 001 (from December 1, 2018 to November 30, 2019)**

Parameter	NOV-19	OCT-19	SEP-19	AUG-19	JUL-19	JUN-19	MAY-19	APR-19	MAR-19	FEB-19	JAN-19	DEC-18
Flow (GPD) Average Monthly	5565	7351	6829	7310	7860	8023	8900	9204	9248	9531	9629	9780
pH (S.U.) Minimum	7.68	7.86	7.72	7.68	7.64	7.75	7.83	7.89	7.70	7.65	7.82	7.86
pH (S.U.) Instantaneous Maximum	7.68	7.86	7.72	7.68	7.64	7.75	7.83	7.89	7.70	7.65	7.82	7.86
Tetrachloro-ethylene (mg/L) Average Monthly	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001
Tetrachloro-ethylene (mg/L) Daily Maximum	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001
Trichloroethylene (mg/L) Average Monthly	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	0.0012	0.0014	< 0.001	0.001	< 0.001	< 0.001	< 0.001
Trichloroethylene (mg/L) Daily Maximum	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	0.0012	0.0014	< 0.001	0.001	< 0.001	< 0.001	< 0.001

**Proposed Effluent Limitations and Monitoring Requirements**

Outfall 001, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Quarterly	Daily Maximum	Instant. Maximum		
Flow (GPD)	Report	XXX	XXX	XXX	XXX	XXX	1/month	Estimate
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/month	Grab
Tetrachloro-ethylene	XXX	XXX	XXX	0.005	0.010	0.013	1/quarter	Grab
Trichloroethylene	XXX	XXX	XXX	0.005	0.010	0.013	1/quarter	Grab