

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 1128144
Authorization ID 1510900

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 West Vine Street</u> <u>Hatfield, PA 19440</u>
Applicant Contact	<u>Stephen Clarke</u>	Facility Contact	<u>Roger Stewart</u>
Applicant Phone	<u>(314) 553-1953</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 30, 2024</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 (MW-2 and RW-2) which pump groundwater to an air stripper. Well MW-2 continuously pumps groundwater at a rate of approximately 5 gpm, and well RW-2 continuously pumps groundwater at a rate of approximately 1 gpm. The treated groundwater is then discharged to the onsite storm water retention pond via Outfall 001. The storm water retention pond discharges to an unnamed tributary to the West Branch of Neshaminy Creek via the storm sewer.

No backwash or system cleaning wastewaters are generated.

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.

No comments received from Operations Section.

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.

Approve	Deny	Signatures	Date
X		<i>Sara Abraham</i> Sara Reji Abraham, E.I.T. / Project Manager	February 6, 2025
X		<i>Pravin Patel</i> Pravin C. Patel, P.E. / Environmental Engineer Manager	02/06/2025

Summary of Review

The remediation is being conducted according to the Act 2 Program. The groundwater monitoring requirement is included in the draft permit similar to the existing permit. According to the permittee's request the sampling frequency for monitoring wells MW-1 and MW-3 are changed to semi-annually. The concentrations of PCE and TCE in these wells have been relatively stable for the past several years as documented in the Annual Progress Reports. Semi-annual sampling will provide enough data to monitor concentration trends moving forward. ECP also concurs with this change.

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	-	December 17, 2024
Hatfield Township	-	December 17, 2024
Montgomery County	-	December 17, 2024

Permit Conditions:

- A. Acquire Necessary Property Rights
- B. Proper Sludge Disposal
- C. WQM Requirement
- D. BAT/BCT Reopener
- E. Dry Stream Discharge
- F. Groundwater Monitoring
- G. Annual Groundwater Report
- H. No Stripper Tower Wastewater
- I. 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 January 1, 2024 to December 31, 2024)

Parameter	DEC-24	NOV-24	OCT-24	SEP-24	AUG-24	JUL-24	JUN-24	MAY-24	APR-24	MAR-24	FEB-24	JAN-24
Flow (GPD) Average Monthly					1040	3405	1366	6773	6755	6721	6549	6934
pH (S.U.) Instantaneous Minimum					7.79	6.96	8.18	8.06	8.02	8.15	8.17	8.15
pH (S.U.) Instantaneous Maximum					7.79	8.30	8.18	8.06	8.02	8.15	8.17	8.15
Tetrachloro-ethylene (mg/L) Average Quarterly				< 0.001			< 0.001			< 0.001		
Tetrachloro-ethylene (mg/L) Daily Maximum				< 0.001			0.001			< 0.001		
Trichloroethylene (mg/L) Average Quarterly				< 0.001			< 0.001			< 0.001		
Trichloroethylene (mg/L) Daily Maximum				< 0.001			< 0.001			< 0.001		

Compliance History

No non compliances.

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) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ 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