pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southeast Regional Office
CLEAN WATER PROGRAM

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

Application Type	**Renewal**	Application No.	**PA0055026**
Facility Type	**Industrial**	APS ID	**1037369**
Major / Minor	**Minor**	Authorization ID	**1351594**

Applicant and Facility Information

Applicant Name	**The Wrightstown Group, L.P.**	Facility Name	**Livingston-King Wrightstown Facility IWTP**
Applicant Address	1337 Wrightstown Road	Facility Address	650 Durham Road
	Wrightstown, PA 18940		Wrightstown, PA 18940
Applicant Contact	Joseph Conroy	Facility Contact	Joseph Conroy
Applicant Phone	(267) 566-3620	Facility Phone	(267) 566-3620
Client ID	250645	Site ID	253163
SIC Code	3444	Municipality	Wrightstown Township
SIC Description	Manufacturing - Sheet Metal Work	County	Bucks
Date Application Received	April 21, 2021	EPA Waived?	Yes
Date Application Accepted		If No, Reason	

Purpose of Application: Permit renewal.

Summary of Review

The permittee has submitted application for renewal of NPDES permit to discharge 0.058 mgd of treated groundwater from groundwater remediation system into UNT to Mill Creek. The existing groundwater remediation system involves discharge treated groundwater from an air stripper remediation system to an unnamed tributary to Mill Creek, which is tributary to the Neshaminy Creek in watershed 2F. The site is located at 650 Durham Road.

The site was previously used to manufacture sheet metal and an active groundwater treatment system has operated since the mid-1980s for chlorinated volatile organic compounds (VOCs), specifically Tetrachloroethylene (PCE) and Trichloroethylene (TCE). Sampling of two onsite wells and an adjacent stream in 1981 by the Bucks County Health Department confirmed the presence of the compounds. A two-tower air stripping unit was put into operation to remove the compounds and contain the migration of the contaminant plume. The current owner of the site is The Wrightstown Group, L.P., and the building onsite is currently being operated as a warehouse and fitness center. The only wastewater currently produced at the site is from the remediation recovery well. The system operates continuously 24 hours per day, 365 days per year, at an average flow rate of 16 gallons per minute or 0.023 million gallons per day (MGD). The design flow of the system is 0.058 MGD.

The groundwater remediation system consists of two air strippers in series to remove PCE and TCE. A granular activated carbo (GAC) back up system is available at site in the event air stripper system failure. Following the treatment, the groundwater is discharged via outfall 003 and flows overland to unnamed tributary to Mill Creek.

There was minor issue with the remediation system in 2020 due to the age of equipment and build-up of scale due to high calcium content of water combined with its aeration in the stripping towers. Permittee has completed necessary work to improve the system. Permittee submitted approximately 30 overdue DMRs and overdue renewal NPDES application.

Approve	Deny	Signatures	Date
X		Ketan Thaker Ketan Thaker / Project Manager	February 1, 2022
X		Pravin Patel Pravin C. Patel, P.E. / Environmental Engineer Manager	02/01/2022

Summary of Review

Existing limits (since the original permit issuance) for VOCs are:

Tetrachloroethylene – Not detectable using Method 624 GC/MS*
Trichloroethylene – 0.005 mg/l

*Permittee uses this method and the reporting level is < 0.001 mg/l, which is below the detection level of 0.0041 mg/l referenced in Ch. 16.

According to the topo map, the discharge is to an intermittent stream. The limits, when originally developed, were protective of drinking water (MCL = 0.005 mg/l for both pollutants) and technology requirements (minimum 90% removal). Based on DMRs for 2011, influent TCE ranged from 0.083 mg/l to 3.34 mg/l and effluent was < 0.001 mg/l, reflecting > 99 % removal efficiency. Influent PCE ranged from <0.001 mg/l to 0.0077 mg/l and effluent was <0.001 mg/l. The low influent concentrations and not-detectable effluent levels prohibit calculation of the removal efficiency for PCE, but the low effluent levels are considered compliant with technology requirements. Limits are the same for this renewal except that, for PCE, since they consistently report <0.001 mg/l a numerical limit of 0.001 mg/l is used instead of "Not Detectable". The recent influent data show Trichloroethylene concentration from 0.0039 mg/l average to 0.021 mg/l Maximum and Tetrachloroethylene concentration 0.0025 mg/l average to 0.004 mg/l maximum.

The Ch. 16 CRL is 0.00069 mg/l for PCE and 0.0025 mg/l for TCE. These standards, along with the aquatic life criteria, will be met at the confluence of the intermittent tributary with Mill Creek, where, based on the topographic map, perennial conditions exist. Although the topographic map indicates intermittent conditions in the unnamed tributary, if the stream is in fact perennial, the Chapter 16 surface water standards would also be achieved at the point of discharge.

Permit continues to require influent sampling and semi-annual background sampling at Production Well P-1.

The recent effluent results show that effluent is in compliance with existing permit limits. Effluent limits for all the parameters will remain the same in this permit renewal.

Act-14 Notification to Wrightstown Township on March 26, 2021.
Act-14 Notification to Bucks County Commissioners on March 26, 2021.

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.	003	Design Flow (MGD)	0.058
Latitude	40Âº 16' 28.75"	Longitude	-74Âº 59' 9.51"
Quad Name		Quad Code	
Wastewater Description:	Groundwater Cleanup Discharge		
Receiving Waters	Unnamed Tributary to Mill Creek (WWF, MF)	Stream Code	02608
NHD Com ID	25480082	RMI	1.9
Drainage Area		Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)		Q_{7-10} Basis	
Elevation (ft)		Slope (ft/ft)	
Watershed No.	2-F	Chapter 93 Class.	WWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Attaining Use(s)		
Cause(s) of Impairment			
Source(s) of Impairment			
TMDL Status	Final	Name	Neshaminy Creek

Background/Ambient Data		Data Source
pH (SU)		
Temperature (°F)		
Hardness (mg/L)		
Other:		

Nearest Downstream Public Water Supply Intake			
PWS Waters		Flow at Intake (cfs)	
PWS RMI		Distance from Outfall (mi)	

Treatment Facility Summary				
Treatment Facility Name: Livingston King Wrightstown Facility IWTP				
Waste Type	**Degree of Treatment**	**Process Type**	**Disinfection**	**Avg Annual Flow (MGD)**
Industrial			No Disinfection	
Hydraulic Capacity (MGD)	**Organic Capacity (lbs/day)**	**Load Status**	**Biosolids Treatment**	**Biosolids Use/Disposal**
		Not Overloaded		

Compliance History

DMR Data for Outfall 003 (from December 1, 2020 to November 30, 2021)

Parameter	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21	JUN-21	MAY-21	APR-21	MAR-21	FEB-21	JAN-21	DEC-20
Flow (MGD) Average Monthly	0.0096	0.0091	0.0099	0.0093	0.0096	0.0099	0.00993 6	0.0102	0.0104	0.0100	0.0102	0.0105
Flow (MGD) Daily Maximum	0.0101	0.0092	0.0104	0.0096	0.0098	0.0102	0.0101	0.0102	0.0105	0.0102	0.0102	0.0105
pH (S.U.) Instantaneous Minimum	8.2	8.2	7.9	8.1	8.3	8.3	8.2	8.3	8.3	8.2	8.1	8.3
pH (S.U.) Instantaneous Maximum	8.3	8.3	8.2	8.4	8.3	8.3	8.3	8.3	8.3	8.2	8.2	8.5
Tetrachloro-ethylene (mg/L) Average Monthly	< 0.0003	< 0.0003	< 0.0003	< 0.0003	< 0.0003	< 0.0003	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002
Tetrachloro-ethylene (mg/L) Influent Average Monthly	0.0026	0.0024	0.0027	0.0027	0.0025	0.0021	0.0021	0.00255	0.002	0.0024	0.0021	0.0023
Tetrachloro-ethylene (mg/L) Daily Maximum	< 0.0003	< 0.0003	< 0.0003	< 0.0003	< 0.0003	< 0.0003	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002
Tetrachloro-ethylene (mg/L) Influent Daily Maximum	0.0026	0.0024	0.0027	0.0027	0.0025	0.0021	0.0021	0.00260	0.002	0.0024	0.0021	0.0023
Trichloroethylene (mg/L) Average Monthly	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002
Trichloroethylene (mg/L) Influent Average Monthly	0.0068	0.0018	0.0097	0.0019	0.0011	0.012	0.003	0.00257	0.0021	0.001	0.0023	0.0009
Trichloroethylene (mg/L) Daily Maximum	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002	< 0.0002
Trichloroethylene (mg/L) Influent Daily Maximum	0.0068	0.0018	0.0097	0.0019	0.0011	0.012	0.003	0.00420	0.0021	0.001	0.0023	0.0009

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" (362-0400-001), SOPs and/or BPJ.

Outfall 003, 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	Average Monthly	Daily Maximum	Maximum	Instant. Maximum		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	2/month	Recorded
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	2/month	Grab
Tetrachloro-ethylene	XXX	XXX	0.001	0.001	XXX	XXX	2/month	Grab
Tetrachloro-ethylene Industrial Influent	XXX	XXX	Report	Report	XXX	XXX	1/month	Grab
Trichloroethylene	XXX	XXX	0.005	0.01	XXX	XXX	2/month	Grab
Trichloroethylene Industrial Influent	XXX	XXX	Report	Report	XXX	XXX	1/month	Grab