pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southeast Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0055891**
Facility Type	**Industrial**	APS ID	**993376**
Major / Minor	**Minor**	Authorization ID	**1273451**

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

Applicant and Facility Information

Applicant Name	**Henderson Road Superfund Site IWOU Technical Steering Committee O'Hara Environmental Services, Inc.**	Facility Name	**Henderson Road Superfund Site**
Applicant Address	14 Dogwood Hill Lane Chadds Ford, PA 19317-9106	Facility Address	372 S Henderson Road King of Prussia, PA 19406
Applicant Contact	James Hagan	Facility Contact	James Hagan
Applicant Phone	(610) 883-1849	Facility Phone	(610) 883-1849
Client ID	307576	Site ID	452540
SIC Code	8748	Municipality	Upper Merion Township
SIC Description	Services - Business Consulting, Nec	County	Montgomery
Date Application Received	April 18, 2019	EPA Waived?	Yes
Date Application Accepted	May 2, 2019	If No, Reason	
Purpose of Application	Permit Renewal.		

Summary of Review

This Fact Sheet summarizes the evaluation of Henderson Road Superfund Site IWOU Technical Steering Committee O'Hara Environmental Services, Inc. application for the renewal of an NPDES permit to discharge treated groundwater from the Henderson Road Superfund Site. The NPDES permit was issued on June 30, 1993 as part of an on-going cleanup effort to recover and remediate groundwater contaminated by industrial wastes disposed of down on-site water supply well. The cleanup effort is regulated under the Hazardous Site Cleanup Act (HSCA).

The site is located at 372 South Henderson Road, King of Prussia, PA 19046. The original and previous permit were based on a flow of 0.082 MGD. The design capacity of the plant is 0.23 MGD. The treated wastewater discharge to an unnamed tributary (00942) to the Schuylkill River, locally known Frog Run. The unnamed tributary is located in 3-F – Schuylkill River Watershed.

The permit includes no changes from the previous permit.

Act 14 Notifications:

Upper Merion Township - April 8, 2019
Office of the Chief Operating Office, Montgomery County - April 8, 2019

Recommended Part C Conditions:

I. Other Requirements
   A. Acquire Necessary Property Rights
   B. Sludge Disposal Requirements

Approve	Deny	Signatures	Date
X		Juan J. Vicenty-Gonzalez / Environmental Engineering Specialist /S/	September 12, 2019
X		Pravin C. Patel, P.E. / Environmental Engineer Manager /S/	9/12/2019

Summary of Review

C. BAT/BCT Reopener
D. Small Stream Discharge
E. Annual Average

II. WQBELs Below Quantitation Limits

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)	.082
Latitude	40º 5' 24.23"	Longitude	-75º 21' 9.96"
Quad Name	Norristown	Quad Code	08-22-2
Wastewater Description:	Groundwater Cleanup Discharge		
Receiving Waters	Unnamed Tributary to Schuylkill River	Stream Code	00942
NHD Com ID	25985524	RMI	0.75
Drainage Area	0.98 mi^2	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	0.675	Q_{7-10} Basis	Pennsylvania Stream Stats
Elevation (ft)	222.8	Slope (ft/ft)	
Watershed No.	3-F	Chapter 93 Class.	
Existing Use	**None**	Existing Use Qualifier	N/A
Exceptions to Use	None	Exceptions to Criteria	N/A
Assessment Status	Not Assessed		
Cause(s) of Impairment			
Source(s) of Impairment			
TMDL Status		Name	
Nearest Downstream Public Water Supply Intake	PWD – Queen Lane Intake		
PWS Waters	Schuylkill River	Flow at Intake (cfs)	
PWS RMI		Distance from Outfall (mi)	

Changes Since Last Permit Issuance: No Changes.

Point of 1st use survey was conducted December 14, 1990 and determination was made that Frog run is an intermittent stream at the point of discharge. Receiving waters information was updated using Pennsylvania StreamStats.

Treatment Facility Summary

Treatment Facility Name: Henderson Road Superfund Site

WQM Permit No.	Issuance Date

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		

Changes Since Last Permit Issuance: No Changes.

Other Comments: The industrial waste treatment plant consists of flow equalization, chemical precipitation, biological treatment, coagulation, sedimentation, mixed media filtration, and liquid phase and vapor phase carbon adsorption.

Compliance History	
Summary of DMRs:	No discharge since July 2006.
Summary of Inspections:	Last inspection was on September 2018. The treatment system has been shut down. They're keeping this permit just in case but nothing really happening at this facility.

Henderson Road Superfund Site (O'Hara Environmental Services, Inc.) PA0055891								
INSP ID	INSPECTED DATE	INSP TYPE	INSPECTION RESULT DESC	INSPECTOR ID	INSPECTOR	CREATION DATE	UPDATE DATE	# OF VIOLATIONS
2533004	11/01/2016	Administrative/ File Review	Violation(s) Noted	00635243	OPILA, TAMI	11/01/2016	11/02/2016	1
2789836	10/04/2018	Administrative/ File Review	Violation(s) Noted	00745832	BLOOM, KRYSTAL	10/17/2018	05/20/2019	1
2610765	04/11/2017	Administrative/ File Review	Violation(s) Noted	00635243	OPILA, TAMI	07/05/2017	05/20/2019	1

Other Comments: According to the consultant, the plant has been shut down since July 17, 2006 as part of an EPA approved Shutdown/Rebound Test and there were no discharges during the permit period. DMR's submitted since July 2006 confirm no discharge from the treatment plant. According to DEP's HSCA program, the plant is currently in shut down mode with a reevaluation in the future. This permit is required in the case of the EPA requiring that we turn on the groundwater treatment plant again. The permittee is currently negotiating with EPA for an alternate solution, but may not know the outcome of this effort until the end of 2020.

Development of Effluent Limitations

Outfall No. 001 **Design Flow (MGD)** .082
Latitude 40º 5' 15.00" **Longitude** -75º 21' 15.00"
Wastewater Description: Groundwater Cleanup Discharge

Best Professional Judgment (BPJ) Limitations

Limits were developed for the 1993 permit based on the consideration of: (1) Groundwater criteria based on the requirements of the Department's "Implementation Guidance for Evaluating Wastewater Discharges to Drainage Ditches and Swales" (1993 version), (2) ARAR limits previously developed, and (3) the Department's "Technical Guidance Document for Landfill Leachate Discharges" (since at the time the 1993 permit was issued, leachate from a neighboring landfill could be directed to the plant for treatment). The limits from the 1998 renewal permit were rolled over from the 1993 permit except for: (1) the deletion of several parameters based on sampling results, (2) expressing carcinogen-based limits as annual limits instead of average monthly limits, and (3) relaxing TDS from 700 mg/l to 1,000 mg/l. The limits in the 2003 renewal permit were rolled over from the 1998 permit except for incorporation of DRBC interpretive Guideline limits for Copper and Zinc of 0.2 and 0.6 mg/l, respectively. Limits for the 2008 permit were rolled over from the 2003 permit.

Since there has been no discharge since 2006, there is no basis to reevaluate the facility's compliance with existing or proposed limits. Many of the effluent limits were based on ARARs, which under federal Superfund laws grandfathers those effluent limits. Therefore, limits of this renewal are rolled over from the 2008 & 2014 permits.

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 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	Report Daily Max	XXX	XXX	XXX	XXX	Continuous	Recorded
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/week	Grab
CBOD5	XXX	XXX	XXX	100	200	XXX	1/month	24-Hr Composite
TSS	XXX	XXX	XXX	100	200	XXX	1/month	24-Hr Composite
Total Dissolved Solids	XXX	XXX	XXX	1000	2000	XXX	1/month	24-Hr Composite
Oil and Grease	XXX	XXX	XXX	15	XXX	XXX	1/month	Grab
Ammonia	XXX	XXX	XXX	20	40	XXX	1/month	24-Hr Composite
Total Arsenic	XXX	XXX	XXX	0.05 Annl Avg	XXX	XXX	1/month	24-Hr Composite
Total Barium	XXX	XXX	XXX	1.0	2.0	XXX	1/month	24-Hr Composite
Total Cadmium	XXX	XXX	XXX	0.01	0.02	XXX	1/month	24-Hr Composite
Total Chromium	XXX	XXX	XXX	0.05	0.1	XXX	1/month	24-Hr Composite
Total Copper	XXX	XXX	XXX	0.2	0.4	XXX	1/month	24-Hr Composite
Dissolved Iron	XXX	XXX	XXX	0.3	0.6	XXX	1/month	24-Hr Composite
Total Iron	XXX	XXX	XXX	22.7	45.4	XXX	1/month	24-Hr Composite

Outfall 001, Continued (from 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		
Total Lead	XXX	XXX	XXX	0.036	0.072	XXX	1/month	24-Hr Composite
Total Silver	XXX	XXX	XXX	0.05	0.1	XXX	1/month	24-Hr Composite
Total Zinc	XXX	XXX	XXX	0.6	1.2	XXX	1/month	24-Hr Composite
Acetone	XXX	XXX	XXX	0.109	0.218	XXX	1/month	Grab
Chlorobenzene	XXX	XXX	XXX	0.02	0.04	XXX	1/month	Grab
1,3-Dichloro-propylene	XXX	XXX	XXX	0.087	0.174	XXX	1/month	Grab
Ethylbenzene	XXX	XXX	XXX	1.4	2.8	XXX	1/month	Grab
Benzene	XXX	XXX	XXX	0.001 Annl Avg	XXX	XXX	1/month	Grab
Carbon Tetrachloride	XXX	XXX	XXX	0.005 Annl Avg	XXX	XXX	1/month	Grab
2-Butanone	XXX	XXX	XXX	0.21	0.42	XXX	1/month	Grab
1,2-Dichloroethane	XXX	XXX	XXX	0.0004 Annl Avg	XXX	XXX	1/month	Grab
Dibromochloro-methane	XXX	XXX	XXX	0.1 Annl Avg	XXX	XXX	1/month	Grab
Dichlorobromo-methane	XXX	XXX	XXX	0.1 Annl Avg	XXX	XXX	1/month	Grab
Chloroform	XXX	XXX	XXX	0.1 Annl Avg	XXX	XXX	1/month	Grab
Methylene Chloride	XXX	XXX	XXX	0.005 Annl Avg	XXX	XXX	1/month	Grab
Total Phenolics	XXX	XXX	XXX	Report	Report	XXX	1/month	24-Hr Composite
1,1-Dichloroethylene	XXX	XXX	XXX	0.0004	0.0008	XXX	1/month	Grab
Tetrachloro-ethylene	XXX	XXX	XXX	0.0007 Annl Avg	XXX	XXX	1/month	Grab
Toluene	XXX	XXX	XXX	2.0	4.0	XXX	1/month	Grab

Outfall 001, Continued (from 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		
Trichloroethylene	XXX	XXX	XXX	0.003 Annl Avg	XXX	XXX	1/month	Grab
Total Xylenes	XXX	XXX	XXX	0.01	0.02	XXX	1/month	Grab
Vinyl Chloride	XXX	XXX	XXX	0.00057 Annl Avg	XXX	XXX	1/month	Grab