

Application Type Renewal  
Facility Type Storm Water  
Major / Minor Minor

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

Application No. PA0056502  
APS ID 1029809  
Authorization ID 1338563

**Applicant and Facility Information**

Applicant Name	<u>Jerc Partners XIII LP</u>	Facility Name	<u>White Pines Partners Golf Course</u>
Applicant Address	<u>171 State Route 173 Suite 201</u> <u>Asbury, NJ 08802-1365</u>	Facility Address	<u>Red Lion Road</u> <u>Huntingdon Valley, PA 19006</u>
Applicant Contact	<u>Gregory Rogerson</u>	Facility Contact	<u>Gregory Rogerson</u>
Applicant Phone	<u>(908) 730-6909</u>	Facility Phone	<u>(908) 730-6909</u>
Client ID	<u>250125</u>	Site ID	<u>246431</u>
SIC Code	<u>9999</u>	Municipality	<u>Lower Moreland Township</u>
SIC Description	<u>Public Admin. - Nonclassifiable</u> <u>Establishment</u>	County	<u>Montgomery</u>
Date Application Received	<u>November 30, 2020</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>Not Applicable</u>	If No, Reason	<u></u>
Purpose of Application	<u>Permit Renewal.</u>		

**Summary of Review**

This application was submitted to renew an individual NPDES permit. Analytical results from the past four (4) years show PCB concentrations above Pennsylvania's surface water criteria. It was noted in the previous permit renewal, that the property owner was required to continue with their Pollution Minimization Plan (PMP) in accordance with guidance outlined on DRBC's website. For this NPDES permit renewal, the owner is required to provide PMP Annual Reports and to collect and analyze annual PCB samples from Outfall 002. A brief description of the site is below.

In this permit renewal, an upstream monitoring point was added and the PCBs concentration was changed to an effluent net total. The upstream monitoring point is a temporary monitoring well (WSP-1) which will be sampled prior to sampling Outfall 002. The two points must be sampled during the same storm event. On November 5, 2020 a sample was collected from WSP-1 immediately after installation. WSP-1 is located near the boundary of the property and through a buried 54" diameter stormwater pipe. The total PCBs were 132,822.4 pg/l indicating contamination coming onto the property. Based on this information, the reporting for total PCBs was changed to net effluent monitoring. TSS and pH are continued from the previous permit at Outfall 002.

The monitoring frequency remains as 1/year. However, the permittee can take additional samples, if they so choose, and after a minimum of four (4) samples are collected, the permittee may submit a justification to the DEP for re-evaluation of the permit based on the sampling results. The samples must be taken at least 60 days apart and meet the requirements in the permit. The re-evaluation must include the sample results. If multiple samples are taken in one year, then the maximum value of the samples must be reported in the eDMR system for the annual report.

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*,

Approve	Deny	Signatures	Date
X		Harmonie Hawley, PhD, PE / Environmental Engineering Specialist /s/	May 12, 2021
X		Pravin C. Patel, P.E. / Environmental Engineer Manager /s/	05/13/2021

### Summary of Review

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.

A brief history of the site was taken from the 2014 Fact Sheet:

"The site is located at the former BUDD Company that is located at the border of Philadelphia and Montgomery Counties. After the BUDD company was closed, the property was developed into the Island Green Country Club by White Pine Partners II LLC. The Island Green Country Club is now a vacant lot. The Philadelphia portion of the property was sold to TEVA Pharmaceutical to be developed into a regional distribution center, while the Montgomery County portion of the site was sold to JERC Partners XIII LP to be developed into residential use – The Valley of Lower Moreland. It has been reported that the TEVA Pharmaceutical project was cancelled.

The BUDD Company formerly assembled railroad cars at this property and the property was later redeveloped under ACT 2 to a recreational use, the Island Green Country Club. The ACT 2 remediation project involved capping PCB contaminated soils located on the property with a minimum of 1 foot of clean fill and vegetation. Since the property was contaminated with PCBs, the stormwater permit was previously modified to include both PCBs and the stormwater parameters from Appendix J of DEP's General NPDES Permit for the Discharge of Stormwater From Industrial Activities (PAG-03). Subsequently, the property no longer has industrial activity, but has legacy PCB contamination from the former BUDD Company. Continuation of the NPDES permit is necessary to address the existing surface water discharge of PCBs."

Act 14 Notifications:

Montgomery County received December 22, 2020

Lower Moreland County received December 17, 2020

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	<u>002</u>	Design Flow (MGD)	<u>0.0 (Stormwater)</u>
Latitude	<u>40° 7' 9.00"</u>	Longitude	<u>-75° 2' 50.00"</u>
Quad Name	<u>Frankford</u>	Quad Code	<u>1845</u>
Wastewater Description: <u>Stormwater from the Former Island Green County Club.</u>			
Receiving Waters	<u>Unnamed Tributary to Huntingdon Valley Creek (TSF, MF)</u>	Stream Code	<u>02442</u>
NHD Com ID	<u>25598943</u>	RMI	<u>0.41</u>
Watershed No.	<u>3-J</u>	Chapter 93 Class.	<u>TSF, MF</u>
Existing Use	<u>Aquatic Life</u>	Existing Use Qualifier	<u>Unknown</u>
Exceptions to Use	<u>None</u>	Exceptions to Criteria	<u>None</u>
Assessment Status	<u>Impaired</u>		
Cause(s) of Impairment	<u>Cause Unknown, Siltation</u>		
Source(s) of Impairment	<u>Urban Runoff/Storm Sewers</u>		
TMDL Status	<u>Pending</u>	Name	<u>Pennypack Creek</u>
Nearest Downstream Public Water Supply Intake		None	

Changes Since Last Permit Issuance: None

Other Comments: RMI is approximate distance from outfall to confluence with Huntingdon Valley Creek (Stream code 02440).

**Compliance History**

**DMR Data for Outfall 002**

Submitted Date	PCBs, Total pg/l	pH SU	TSS mg/l
01/08/2021	92,098.88	7.9	5.8
12/02/2019	102,195	7.6	4.5
12/5/2018	184,169.386	7.8	2.7
12/7/2017	443,000.4	7.6	28

**Open Violations**

One open violation was found on March 19, 2021 for failure to submit a renewal permit. This violation was addressed with a Consent Order dated November 3, 2020.

**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 002, 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 Monthly	Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	XXX	Report	1/year	Grab
TSS	XXX	XXX	XXX	XXX	XXX	Report	1/year	Grab
Total PCBs (pg/L)	XXX	XXX	XXX	XXX	XXX	Report	1/year	Grab
Total PCBs (pg/L) Effluent Net	XXX	XXX	XXX	XXX	XXX	Report	1/year	Grab

Compliance Sampling Location: Outfall 002

Other Comments: The Effluent Net will be a comparison of upstream monitoring point, WSP-1, and Outfall 002.

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**Outfall 010**, 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 Monthly	Maximum	Instant. Maximum		
Total PCBs (pg/L) Upstream Monitoring	XXX	XXX	XXX	XXX	XXX	Report	1/year	Grab

Compliance Sampling Location: WSP-1

Other Comments: None