pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southeast Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0056570**
Facility Type	**Storm Water**	APS ID	**1062216**
Major / Minor	**Minor**	Authorization ID	**1393992**

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

Applicant and Facility Information

Applicant Name	**Hoover Treated Wood Products, Inc.**	Facility Name	**Hoover Treated Wood Products Oxford Facility**
Applicant Address	154 Wire Road	Facility Address	385 Waterway Road
	Thomson, GA 30824		Oxford, PA 19363
Applicant Contact	Curtis Rhodes	Facility Contact	Curtis Rhodes
Applicant Phone	(706) 595-5058	Facility Phone	(706) 595-5008
Client ID	329020	Site ID	457124
SIC Code	2491	Municipality	East Nottingham Township
SIC Description	Manufacturing - Wood Preserving	County	Chester
Date Application Received	April 25, 2022	EPA Waived?	Yes
Date Application Accepted		If No, Reason	

Purpose of Application: Permit renewal.

Summary of Review

The applicant requests the renewal of a NPDES permit to discharge stormwater from Hoover Treated Wood Products Oxford Facility locate at 385 Waterway Road, Oxford, PA 19363. This facility discharges an Unnamed Tributary to Little Elk Creek a designated High Quality – Trout Stocking Fishes (HQ – TSF) under Chapter 93.

This facility pressure treats purchased wood products, (lumber, plywood, timbers, and engineered wood products), with waterborne fire-retardant chemical and waterborne preservative chemicals. Most of these treated products are re-dried utilizing natural gas direct fired burners in dry kilns. Forklifts and material handling machines (stackers) are used to move and prepare wood for various processing steps. Materials are received and shipped primary by truck with some items handled by rail. Properly designed and operated drip pads are utilized in the pressure treatment activity. All liquid chemicals are handled in storage tanks/totes/drums utilizing secondary containment. This facility generates no wastewater as all liquids are closed loop. Critical areas and materials are protected by roof. Stormwater contacting some sensitive areas is collected and introduced into the processes as make-up water.

The site contains two outfalls (001 & 002) which receive stormwater from wood storage areas, wood treating areas, and other buildings. There are different wood treating chemicals with secondary containment and a Diesel Fuel Tank on site. These two outfalls drain stormwater from approximately 14.645 acre of wood treating, drying, and processing, forklift, truck traffic, and wood storage. Outfall 001 is located in the eastern side and Outfall 002 is located in the southernmost part of the facility. Outfall 001 drains approximately 430,000 ft^2 of 13% impervious area. Outfall 002 drains approximately 247,822 ft^2 with about 15% impervious area. Outfall 001 has stormwater flow mainly associated with Micronized Copper Azole (MCA) waterborne preservative pressure treated wood. According to permit application that all storage tanks and totes with the components and working solutions are housed within secondary containment and inside a building, no stormwater comes in contact with the treating equipment and storage tanks/totes. Freshly treated wood resides on a coated concrete drip pad under roof with any stormwater blowing into the pads or any deminimis drippage being collected and used in the process.

Approve	Deny	Signatures	Date
X		*Ketan Thaker* Ketan Thaker / Project Manager	5/27/2022
X		***Pravin Patel*** Pravin C. Patel, P.E. / Environmental Engineer Manager	05/27/2022

Summary of Review

Untreated wood (white wood) and treated wood in process or in finished goods storage has exposure to precipitation. Outfall 002 has stormwater flow mainly associated with Pyro-Guard fire retardant waterborne pressure treated wood. Pyro-Guard is formulated on site from purchased chemicals, Hoover purchases five components and a microbiocide mold inhibitor which are mixed together along with water on site for the Pyro-Guard working solution. All storage tanks and totes with the components and working solutions are housed within secondary containment and inside a building except one storage tank. This storage tank is within secondary containment with all stormwater contacting the tank and auxiliary piping being collected and used in the process. No stormwater comes in contact with the treating equipment and inside storage tanks/totes, freshly treated wood resides on a coated concrete drip pad with any stormwater contacting the pad or freshly treated wood being collected and used in the process – the drip pad is practically under roof. Untreated wood (white wood) and treated wood in process or in finished goods storage has exposure to precipitation.

The monitoring requirements for all the parameters will continue for this permit renewal. This is a wood treatment facility, therefor the applicable appendix is Appendix D – Timber Products under the industrial general permit (PAG-03). Monitoring for Pentachlorophenol is not required as permittee has certified that no chlorophenolic formulations are used at this facility.

Act-14 Notification to East Nottingham Township on March 23, 2022 via certified mail.
Act-14 Notification to Chester County on March 23, 2022 via certified mail.

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)	0
Latitude	39º 46' 11.00"	Longitude	-75º 58' 58.40"
Quad Name	Oxford	Quad Code	2038
Wastewater Description:	Stormwater		
Receiving Waters	Unnamed Tributary to Little Elk Creek (HQ-TSF, MF)	Stream Code	06703
NHD Com ID	112188926	RMI	0.2
Drainage Area	0.27 mi^2	Yield (cfs/mi^2)	0.034
Q_{7-10} Flow (cfs)	0.00923	Q_{7-10} Basis	PA StreamStats
Elevation (ft)	538.3	Slope (ft/ft)	1.8
Watershed No.	7-K	Chapter 93 Class.	HQ-TSF, 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		Name	

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)	

Changes Since Last Permit Issuance: No changes

Discharge, Receiving Waters and Water Supply Information

Outfall No.	002	Design Flow (MGD)	0
Latitude	39º 46' 6.93"	Longitude	-75º 58' 59.91"
Quad Name	Oxford	Quad Code	2038
Wastewater Description:	Stormwater		
Receiving Waters	Unnamed Tributary to Little Elk Creek (HQ-TSF, MF)	Stream Code	06703
NHD Com ID	112188926	RMI	0.2
Drainage Area	0.27 mi^2	Yield (cfs/mi^2)	0.034
Q_{7-10} Flow (cfs)	0.00923	Q_{7-10} Basis	PA StreamStats
Elevation (ft)	538.3	Slope (ft/ft)	1.8
Watershed No.	7-K	Chapter 93 Class.	HQ-TSF, 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		Name	

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)	

Changes Since Last Permit Issuance: No changes

Compliance History

DMR Data for Outfall 001 (from April 1, 2021 to March 31, 2022)

Parameter	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21	JUN-21	MAY-21	APR-21
pH (S.U.) Daily Maximum				7.5						7.8		
CBOD5 (mg/L) Daily Maximum				2.7						4.9		
COD (mg/L) Daily Maximum				10.7						22.1		
TSS (mg/L) Daily Maximum				34						46		
Oil and Grease (mg/L) Daily Maximum				< 3.0						< 0.00001		
Nitrate-Nitrite (mg/L) Daily Maximum				0.24						0.2		
Ammonia (mg/L) Daily Maximum				< 0.6						< 0.00001		
Total Phosphorus (mg/L) Daily Maximum				0.42						0.76		
Total Arsenic (mg/L) Daily Maximum				0.0040						0.0036		
Total Chromium (mg/L) Daily Maximum				0.010						0.0056		
Total Copper (mg/L) Daily Maximum				0.038						0.0237		

DMR Data for Outfall 002 (from April 1, 2021 to March 31, 2022)

Parameter	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21	JUN-21	MAY-21	APR-21
pH (S.U.) Daily Maximum				7.83						8.0		
CBOD5 (mg/L) Daily Maximum				3.4						2.8		
COD (mg/L) Daily Maximum				12.3						16.2		
TSS (mg/L) Daily Maximum				55						24		
Oil and Grease (mg/L) Daily Maximum				< 3.0						< 0.00001		
Nitrate-Nitrite (mg/L) Daily Maximum				0.68						1.37		
Ammonia (mg/L) Daily Maximum				1.31						< 0.00001		
Total Phosphorus (mg/L) Daily Maximum				4.90						0.82		
Total Arsenic (mg/L) Daily Maximum				0.0048						0.0087		
Total Chromium (mg/L) Daily Maximum				0.024						0.02		
Total Copper (mg/L) Daily Maximum				0.010						0.0165		

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		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
CBOD5	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Nitrate-Nitrite	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Ammonia	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Arsenic	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Chromium	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Copper	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

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) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
CBOD5	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Nitrate-Nitrite	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Ammonia	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Arsenic	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Chromium	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Copper	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab