pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southeast Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0058602**
Facility Type	**Storm Water**	APS ID	**1099493**
Major / Minor	**Minor**	Authorization ID	**1459339**

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

Applicant and Facility Information

Applicant Name	**Delaware Valley Concrete Co. Inc.**	Facility Name	**Delaware Valley Concrete Hatboro Plant**
Applicant Address	248 E County Line Road	Facility Address	248 E County Line Road
	Hatboro, PA 19040-2116		Hatboro, PA 19040-2116
Applicant Contact	Gregory Saeger	Facility Contact	Gregory Saeger
Applicant Phone	(215) 675-8900	Facility Phone	(215) 275-8900
Client ID	62589	Site ID	550240
SIC Code	3272	Municipality	Hatboro Borough
SIC Description	Manufacturing - Concrete Products, Nec	County	Montgomery
Date Application Received	September 26, 2023	EPA Waived?	Yes
Date Application Accepted		If No, Reason	

Purpose of Application: Renewal of Individual Industrial Stormwater permit.

Summary of Review

The permittee requests approval for the renewal of a National Pollutant Discharge Elimination System (NPDES) Individual Permit to discharge stormwater from Delaware Valley Concrete Co. Inc. (DVC). The facility is located at 248 E County Line Road, Hatboro, PA 19040 and discharges stormwater to an Unnamed Tributary of Pennypack Creek which is designated as a Trout Stocking Fishes, Migratory Fishes (TSF, MF) waters under Chapter 93.

In addition to the batch plant, DVC owns a parcel on Oakdale Avenue that was used for the truck barrel washout. In 2001, DVC installed a reclamation unit at the batch plant and terminated the use of the washout parcel for interior cleaning of the truck barrel. There are two Outfalls, 001 for the batch plant and 002 of the Oakdale Avenue parcel.

Concrete is produced by mixing dry aggregate with cement, chemical admixtures and water. Raw aggregate is stockpiled in the vicinity of the plant. The aggregate is subsequently conveyed and loaded into mixer trucks along with cement, chemical admixtures and water. Construction equipment is stored at the plant during the winter months. Maintenance is performed on the equipment in buildings located at the concrete plant. As part of their operations, the Hatboro facility stores and handles petroleum products and other liquids at the facility which are considered “oil” under the SPCC regulations. Oil includes, but is not limited to, petroleum products, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged soil.

The facility is currently rebuilding the Solids Storage Bin that is used to hold concrete fines removed from the Wash Out Basins. Filter fabric and concrete block are being installed. The Wash Out Basins are dug out every week and the fines are placed into the Solids Storage Bin. The fines are then transported to a landfill as clean fill. There are three Concrete Wash Out Basins used for the concrete barrel trucks. The 3 basins are connected and there is one pump that is used to recycle the water to wash out the trucks called truck rinse. There is an additional pump used to pump the water to the pit/basin for Plant #1. Concrete Trucks dump waste concrete into the first two basins. The solids

Approve	Deny	Signatures	Date
X		*Amy Boginsky* Amy Boginsky, MS, EIT / Environmental Engineering Specialist	February 1, 2024
X		*Pravin Patel* Pravin C. Patel, P.E. / Environmental Engineer Manager	02/02/2024

Summary of Review

and concrete fines are dug out of each of the 3 basins. There is no concrete reclaimer on this site. The pit/basin for Plant #1 holds excessive water from the 3 Concrete Wash Out Basins. This water is then pumped to Plant #1 to make up batching and is sent first to the cold process tank. The cold-water tank holds 12,000 gallons and is pumped to the hot water tank that holds 15,000 gallons. There are 4 admixture tanks onsite that hold 1500 gallons each and contained calcium chloride and other salts used in the concrete batching process.

The stormwater in the main plant area fills the Concrete Wash Out Pits but does not discharge to Outfall 001. There is currently no stormwater discharge via the dry swale that flows to outfall 001.

A street sweeper is used to remove fines and dust from the plant storage area and entrance.

DVC owns a second property in Hatboro on Oakdale Avenue that is utilized as a storage yard and is the location of outfall 002. There are sand and storage bins and additional concrete barrel trucks stored at this location. All waste concrete is placed into concrete blocks and any excess is taken to additional concrete plants.

Stormwater samples for outfall 002 are taken from the stormwater inlet in the roadway adjacent to the gate for this property. The stormwater results for Total Iron and Aluminum were high for the last quarter of 2020. This could be due to DVC's stormwater comingling with stormwater from the adjacent Sullivan's Scrap Metal Facility. **Representative samples of the discharge from DVC's Oakdale Avenue property should be collected. Samples should be taken from the facility during wet weather before the flow enters the stormwater inlet or collection system where it comingles with stormwater from adjacent facilities. This could be done by sampling planar flow just as it leaves the DVC property or immediately before it leaves the property.**

Stormwater Sampling Results for Outfalls 002 were submitted in the permit application are found below.

Outfall 002	
Pollutant	Maximum Concentration (mg/l)
Oil and Grease	N.D.
TSS	4.1
pH (S.U.)	Min: 6.79 Max: 8.02
Total Aluminum	Avg: 0.109; Max: 0.190
Total Iron	Avg: 0.118; Max: 0.140

All parameters are below permit limits and most stringent criterion.

The reporting requirements of once per quarter will remain in this permit renewal to continue to be consistent with reporting requirements of similar stormwater individual permits in the southeast region. Total Phosphorus and Total Nitrogen reporting requirements were added in this permit renewal per the below explanation.

Total Suspended Solids

In accordance with the EPA Multi-Sector General Permit – storm water discharges from Concrete and Gypsum Product Manufacturers (SIC 3271-3275) have a benchmark monitoring cutoff concentration for TSS of 100 mg/l. Also, under 40 CFR 411 Cement Facility Manufacturing, Materials Storage Runoff. Any discharge composed of runoff that derives from the storage of materials including raw materials, intermediate products, finished products, and waste materials that are used in or derived from the manufacture of cement has a TSS limit of 50 mg/l. 40 CFR 411, exempts discharges from the technology-based limits for storm events exceeding a 10-year, 24-hour event.

pH

In accordance with 25 Pa Code 95.2 – Industrial wastes shall have a pH of no less than 6 and no greater than 9 S.U. Under this subchapter, exceptions may be made for streams impacted with acid mine drainage. In accordance with 25 Pa Code 93.7 – Specific water quality criteria for pH shall be from 6.0 to 9.0 S.U.

Oil and Grease

Summary of Review

In accordance with 25 Pa Code 93.6 – Specific substances to be controlled include, but are not limited to, floating materials, oil, grease, scum and substances which produce color, tastes, odors, turbidity or settle to form deposits. In accordance with 25 Pa Code 95.2 – Wastewaters shall at no time contain more than 15 mg/l of oil as a daily average not more than 30 mg/l of oil at any time, or whatever lesser amount the Department may specify for a given discharge or type or discharge, etc. Monitor and report will continue in this permit renewal.

Total Aluminum, Total Iron, Total Nitrogen, & Total Phosphorus

The SIC applicable to this facility and submitted in the permit renewal application is 3272. This SIC is within the SIC 3271-3275 for Concrete, Gypsum, and Plaster Products. In the General Permit for Discharge of Stormwater Associated with Industrial Activity (PAG-03) this SIC code is for Appendix N. Appendix N requires general permits to monitor and report for TSS, pH, Oil and Grease, Total Aluminum, Total Iron, Total Nitrogen, and Total Phosphorus. A reporting requirement for Total Nitrogen and Total Phosphorus were added to this permit renewal for all the outfalls to comply with the new requirements of the new PAG-03.

Stormwater BMPs

The EPA Multi-Sector General Permit (MSGP) covers Concrete and Gypsum Product Manufacturers (SIC 3271-3275). Parts 4 and 6 of the MSGP requires that a Storm Water Pollution Prevention Plan (SWPPP) be prepared that includes structural, non-structural and other BMPs. Structural BMPs include structures that typically are used to divert, infiltrate, reuse, or otherwise reduce pollutants in storm water discharges from the site. Storm water BMPs shall be designed to control pollutants to the technology based effluent limits established for the concrete product industry for storm events up to and including a 10-year, 24-hour storm event. The DEP determined that waste stockpiles of concrete are an environmental and safety concern and shall be properly managed by the facility. Specific BMP that requires the removal of stockpiled waste concrete material, and the proper management of excess concrete and tuck barrel washings will continue in this permit renewal.

Act 14 Notifications:

Hatboro Borough - May 19, 2023
Montgomery County Board of Commissioners - May 19, 2023

Recommended Part C Conditions:

I. Stormwater Outfalls and Authorized Non-Stormwater Discharges
II. Best Management Practices (BMPs)
III. Stormwater Monitoring Requirements
IV. Routine Inspections
V. Preparedness, Prevention and Contingency (PPC) Plan
    A. Acquire Necessary Property Rights
    B. Sludge Disposal Requirement
    C. Remedial Measures if Public Nuisance
    D. 10-year, 24-Hour Rainfall Event Definition

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	40º 11' 10.37"	Longitude	-75º 5' 59.23"
Quad Name	Hatboro	Quad Code	1745
Wastewater Description:	Stormwater		
Receiving Waters	Unnamed Tributary of Pennypack Creek (TSF, MF)	Stream Code	02463
NHD Com ID	25599655	RMI	0.7600
Drainage Area	1.23 mi^2	Yield (cfs/mi^2)	0.017
Q_{7-10} Flow (cfs)	0.021	Q_{7-10} Basis	StreamStats
Elevation (ft)	252.36	Slope (ft/ft)	
Watershed No.	3-J	Chapter 93 Class.	TSF, MF
Existing Use	**None**	Existing Use Qualifier	N/A
Exceptions to Use	None	Exceptions to Criteria	N/A
Assessment Status	Impaired		
Cause(s) of Impairment	METALS, METALS, ORGANICS, ORGANICS		
Source(s) of Impairment	INDUSTRIAL POINT SOURCE DISCHARGE, INDUSTRIAL POINT SOURCE DISCHARGE, INDUSTRIAL POINT SOURCE DISCHARGE, INDUSTRIAL POINT SOURCE DISCHARGE		
TMDL Status		Name	

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

Nearest Downstream Public Water Supply Intake	Aqua PA Inc Hatboro Windsor Rd Well 17		
PWS Waters	Unnamed Tributary of Pennypack Creek	Flow at Intake (cfs)	3.547
PWS RMI	0.32	Distance from Outfall (mi)	0.15

Changes Since Last Permit Issuance: No discharge was reported from this outfall starting during the 01/2020 – 03/2020 reporting period until present

Discharge, Receiving Waters and Water Supply Information

Outfall No.	002	Design Flow (MGD)	0
Latitude	40º 11' 10.38"	Longitude	-75º 5' 59.22"
Quad Name	Hatboro	Quad Code	1745
Wastewater Description:	Stormwater		
Receiving Waters	Unnamed Tributary of Pennypack Creek (TSF, MF)	Stream Code	02463
NHD Com ID	25599655	RMI	0.7600
Drainage Area	1.23 mi^2	Yield (cfs/mi^2)	0.017
Q_{7-10} Flow (cfs)	0.021	Q_{7-10} Basis	StreamStats
Elevation (ft)	252.36	Slope (ft/ft)	
Watershed No.	3-J	Chapter 93 Class.	TSF, MF
Existing Use	**None**	Existing Use Qualifier	N/A
Exceptions to Use	None	Exceptions to Criteria	N/A
Assessment Status	Impaired		
Cause(s) of Impairment	METALS, METALS, ORGANICS, ORGANICS		
Source(s) of Impairment	INDUSTRIAL POINT SOURCE DISCHARGE, INDUSTRIAL POINT SOURCE DISCHARGE, INDUSTRIAL POINT SOURCE DISCHARGE, INDUSTRIAL POINT SOURCE DISCHARGE		
TMDL Status		Name	

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

Nearest Downstream Public Water Supply Intake	Aqua PA Inc Hatboro Windsor Rd Well 17		
PWS Waters	Unnamed Tributary of Pennypack Creek	Flow at Intake (cfs)	3.547
PWS RMI	0.32	Distance from Outfall (mi)	0.15

Changes Since Last Permit Issuance: None

Compliance History	
Summary of DMRs:	Total Suspended Solids and pH DMR data (below) submitted in the past year are below the permit limits.
Summary of Inspections:	The site was last inspected on 2/26/21 with no violations observed. Inspection report include below.

DVC Hatboro CEI 2-26-2021.PDF.pdf

Compliance History

DMR Data for Outfall 002 (from December 1, 2022 to November 30, 2023)

Parameter	NOV-23	OCT-23	SEP-23	AUG-23	JUL-23	JUN-23	MAY-23	APR-23	MAR-23	FEB-23	JAN-23	DEC-22
pH (S.U.) Instantaneous Minimum			7.13			7.33			6.79			8.02
pH (S.U.) Instantaneous Maximum			7.13			7.33			6.79			8.02
TSS (mg/L) Average Quarterly			11.0			0.20			0.3			0.01
TSS (mg/L) Daily Maximum			11.0			0.20			0.3			0.01
Total Aluminum (mg/L) Daily Maximum			0.1			34			0.3			0.01
Total Iron (mg/L) Daily Maximum			0.02			0.01			0.3			96

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" (386-0400-001), 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 Quarterly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/quarter	Grab
TSS	XXX	XXX	XXX	50.0	100.0	100	1/quarter	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Calculation
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab

Compliance Sampling Location: Outfall 001

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" (386-0400-001), 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 Quarterly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/quarter	Grab
TSS	XXX	XXX	XXX	50.0	100.0	100	1/quarter	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Calculation
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab

Compliance Sampling Location: Outfall 002