Pennsylvania Department of Environmental Protection

Northeast Regional Office
CLEAN WATER PROGRAM

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

Application Type	**Renewal**	Application No.	**PA0063606**
Facility Type	**Industrial**	APS ID	**1035363**
Major / Minor	**Minor**	Authorization ID	**1471870**

Applicant and Facility Information

Applicant Name	**Trogon Development LLC**	Facility Name	**Bangor Ash Disposal Site**
Applicant Address	PO Box 1636	Facility Address	525 Bill Scott Boulevard
	Canovanas, PR 00729		Bangor, PA 18013
Applicant Contact	Jesse Froh	Facility Contact	Linda Denison
Applicant Phone	(614) 580-6736	Facility Phone	(614) 565-2297
Client ID	361817	Site ID	262806
SIC Code	4953	Municipality	Bangor Borough
SIC Description	Trans. & Utilities - Refuse Systems	County	Northampton
Date Application Received	January 30, 2024	EPA Waived?	Yes
Date Application Accepted	January 30, 2024	If No, Reason	-

Purpose of Application: Renewal of NPDES permit.

Summary of Review

The applicant is requesting renewal of an NPDES permit for a discharge of industrial wastewater into Brushy Meadow Creek, a tributary to Martins Creek and a CWF/MF receiving stream in state water plan basin 01-F (Jacoby – Bushkill Creeks). As per DEP's current existing use list, the receiving stream doesn't have an existing use classification that is more protective than its designated use. Note: Martins Creek has a HQ-CWF/MF basin delineation beginning at the confluence of East Fork Martins Creek & West Fork Martins Creek (2 ½ miles upstream of Brushy Meadow Creek confluence) and ending at the confluence with Tributary 63256 (1 mile downstream of Brushy Meadow Creek confluence), however, Brushy Meadow Creek is specifically left out of this designation.

Leachate wastewater from the site originates from the coal-fired Portland Generating Station. Coal combustion products (fly ash & bottom ash) were delivered to this landfill site known as the Bangor Ash Disposal Site. The site is closed but monitored for leachate pollutants at Outfall 001 and stormwater only at Outfall 002.

Martins Creek is listed as being impaired for siltation, flow regime modifications, and habitat alterations with "erosion from derelict land" as the source per the 2024 Pennsylvania Integrated Water Quality Monitoring and Assessment Report. DEP regional biologists previously confirmed the impairment stems from the past historic slate mining activities throughout the watershed that has altered the flow paths and geometry of many tributary streams.

This industrial waste facility is categorized as a Minor IW facility with ELGs and is subject to requirements of EPA's Title 40 - Protection of Environment, Part 423 - Steam Electric Power Generating Point Source Category. The following technology-based limitations are carried over from the previous renewal at Outfall 001 for low-volume waste sources:

Approve	Deny	Signatures	Date
X		Brian Burden, E.I.T. / Project Manager	March 12, 2025
X		Edward Dudick, P.E. / Environmental Engineer Manager	March 12, 2025

Summary of Review

Pollutant or pollutant property	BPT effluent limitations	
	Maximum for any 1 day (mg/l)	Average of daily values for 30 consecutive days shall not exceed (mg/l)
TSS	100.0	30.0
Oil and grease	20.0	15.0

Pollutant sampling results provided with the permit renewal application were modeled using DEP's Toxics Management Spreadsheet (TMS). A separate model run was conducted for the public water supply pollutants of concern using the nearest downstream intake as the second modeling point (Easton Area Water System – 22 MGD pumping capacity). Drainage areas at each modeling point were delineated using USGS's StreamStats interactive map, RMIs were obtained from DEP's eMapPA, and elevations were obtained using the elevation profile tool in StreamStats. The RMI at Outfall 001 on Brushy Meadow Creek was estimated since eMapPA and StreamStats show the Brushy Meadow Creek confluence at two different locations. The low flow yield (LFY) of 0.196 cfs/mi^2 used for modeling during the previous renewal was utilized for this renewal. The LFY is based on historical data for stream gage 01446650. eDMR monthly average flows since the previous permit effective date were averaged to obtain a design flow of 0.03 MGD. The TMS recommended the following monitoring requirements:

	Mass Limits		*Concentration Limits*				
Pollutants	AML (lbs/day)	MDL (lbs/day)	AML	MDL	IMAX	Units	Governing WQBEL
Total Boron	Report	Report	Report	Report	Report	µg/L	29,507
Total Cadmium	Report	Report	Report	Report	Report	µg/L	9.35
Total Selenium	Report	Report	Report	Report	Report	µg/L	92.0
Total Thallium	Report	Report	Report	Report	Report	µg/L	4.43

Quarterly monitoring/reporting requirements are added to this renewal for Total Cadmium, Total Selenium, and Total Thallium at Outfall 001. The previously established water quality-based limitation for Total Boron and the technology-based limitations for pH are carried over in this renewal.

The previous renewal included limitations for TSS and Oil & Grease for Outfall 002 which are carried over in this renewal. As in the previous permit, Outfall 002 is to be sampled "upon request".

The permittee requested changing the TSS and Total Boron sample type from "24-hour composite" to "grab" at Outfall 001, which is granted. The permittee provided the following justification for the change: "*This outfall is from a pond with a greater than 24-hour retention time. Since the only source of water for the site is stormwater, there are no rapid fluctuations in the discharge that need to be accommodated by a composite sample."*

As per current DEP guidance, the template Part C special condition titled "BMPs to Address Aqueous Film Forming Foam (AFFF)" is added to this renewal.

TMS PA0063606.pdf TMS PA0063606 PWS.pdf Watershed Information.pdf

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*

Summary of Review
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)	0.03 (average since previous permit effective date)
Latitude	40º 52' 10"	Longitude	-75º 12' 0"
Quad Name	Bangor	Quad Code	1244
Wastewater Description:	Closed ash disposal site wastewater		

Receiving Waters	Brushy Meadow Creek (CWF, MF)	Stream Code	64106
NHD Com ID	132737434	RMI	0.5
Drainage Area	4.13 mi^2	Yield (cfs/mi^2)	0.196
Q_{7-10} Flow (cfs)	0.8	Q_{7-10} Basis	USGS Gage Station #01446650 historic info
Elevation (ft)	516	Slope (ft/ft)	0.008
Watershed No.	1-F	Chapter 93 Class.	CWF, MF
Existing Use	-	Existing Use Qualifier	-
Exceptions to Use	-	Exceptions to Criteria	-
Assessment Status	Impaired		
Cause(s) of Impairment	Flow Regime Modification, Habitat Alterations, Siltation		
Source(s) of Impairment	Erosion from derelict land (barren land)		
TMDL Status	-	Name	-

Background/Ambient Data		Data Source
pH (SU)	-	-
Temperature (°F)	-	-
Hardness (mg/L)	220	1999 Water Chemistry Table
Other:	-	-

Nearest Downstream Public Water Supply Intake		Easton Area Water System	
PWS Waters	Delaware River	Flow at Intake	909 cfs - (4640 mi^2 D.A.)
PWS RMI	110.4	Distance from Outfall	13.8 mi