

Application Type Renewal  
 Facility Type Non-Municipal (See  
Comments below)  
 Major / Minor Minor

**NPDES PERMIT FACT SHEET  
INDIVIDUAL SEWAGE**

Application No. PA0080004  
 APS ID 833787  
 Authorization ID 1299404

**Applicant and Facility Information**

Applicant Name	<u>Hartman Snack Group Inc.</u>	Facility Name	<u>Hartman Snack Group Inc. (Gibbles Foods)</u>
Applicant Address	<u>6647 Molly Pitcher Highway Chambersburg, PA 17202-7713</u>	Facility Address	<u>6647 Molly Pitcher Highway South Chambersburg, PA 17202</u>
Applicant Contact	<u>Amy Hartman</u>	Facility Contact	<u>Lisa Bard</u>
Applicant Phone	<u>(717) 375-2243</u>	Facility Phone	<u>(717) 375-2243</u>
Client ID	<u>309503</u>	Site ID	<u>451753</u>
Ch 94 Load Status	<u>Not Overloaded</u>	Municipality	<u>Antrim Township</u>
Connection Status	<u>No Limitations</u>	County	<u>Franklin</u>
Date Application Received	<u>January 14, 2019</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>December 18, 2019</u>	If No, Reason	<u></u>
Purpose of Application	<u>NPDES Renewal &amp; Facility Type Modification.</u>		

**Summary of Review**

Hartman Snack Group Inc. (HSG) has applied to the Pennsylvania Department of Environmental Protection (DEP) for reissuance of its NPDES permit. The permit was last reissued on June 20, 2014 and became effective on July 1, 2014. The permit expired on June 30, 2019 but the terms and conditions of the permit have been extended since that time.

A site visit revealed that the facility may be eligible for DEP's No Exposure Certification for its stormwater runoff as there was no exposure of industrial activities and materials to stormwater. HSG submitted a no exposure certification form confirming that the facility is eligible for No Exposure Certification. As a result, DEP has decided to convert the facility type from a minor Industrial Waste (IW) without ELG to an individual Small Flow Treatment Facility (SFTF) while reviewing the permit renewal application. Details of this change will be discussed throughout this fact sheet.

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.

Approve	Deny	Signatures	Date
		Jinsu Kim / Environmental Engineering Specialist	January 7, 2020
		Daniel W. Martin, P.E. / Environmental Engineer Manager	
		Maria D. Bebenek, P.E. / Program manager	

**Discharge, Receiving Waters and Water Supply Information**

Outfall No.	<u>001</u>	Design Flow (MGD)	<u>0.001</u>
Latitude	<u>39° 50' 49.76"</u>	Longitude	<u>-77° 42' 53.63"</u>
Quad Name	<u>Greencastle</u>	Quad Code	<u>2024</u>
Wastewater Description: <u>Sewage Effluent</u>			
Receiving Waters	<u>Unnamed Tributary of Conococheague Creek (WWF, MF)</u>	Stream Code	<u>60133</u>
NHD Com ID	<u>134368266</u>	RMI	<u>1.04</u>
Drainage Area	<u>0.64 sq.mi.</u>	Yield (cfs/mi <sup>2</sup> )	<u></u>
Q7-10 Flow (cfs)	<u>0.191</u>	Q7-10 Basis	<u></u>
Elevation (ft)	<u></u>	Slope (ft/ft)	<u></u>
Watershed No.	<u>13-C</u>	Chapter 93 Class.	<u>WWF, MF</u>
Existing Use	<u>None</u>	Existing Use Qualifier	<u>None</u>
Exceptions to Use	<u>None</u>	Exceptions to Criteria	<u>None</u>
Assessment Status	<u>Attaining Use(s)</u>		
Cause(s) of Impairment	<u></u>		
Source(s) of Impairment	<u></u>		
TMDL Status	<u>Name</u>		
Nearest Downstream Public Water Supply Intake	<u>Hagerstown</u>		
PWS Waters	<u>Potomac River</u>	Flow at Intake (cfs)	<u></u>
PWS RMI	<u></u>	Distance from Outfall (mi)	<u></u>

**Drainage Area**

The discharge is to Unnamed Tributary 60133 of Conococheague Creek at RMI 1.04. A drainage area upstream of the discharge point is estimated to be 0.64 sq.mi using USGS StreamStats available at <https://streamstats.usgs.gov/ss/>.

**Streamflow**

USGS StreamStats produced a Q7-10 flow of 0.191 cfs at the point of discharge.

**Unnamed Tributary of Conococheague Creek**

Under 25 Pa Code §93.9z, all unnamed tributaries to Conococheague Creek from LR 28017 to PA-MD State Border are designated as warm water fishes and support migratory fishes. The main stem, Conococheague Creek is also designated as warm water fishes. No special protection waters are therefore impacted by this discharge. DEP's latest integrated water quality report shows that the receiving stream at the point of discharge is not impaired.

**Public Water Supply Intake**

The fact sheet developed for the last permit renewal indicates that the nearest downstream public water supply intake is located on Potomac River. Based on the distance and nature, the discharge is not expected to impact the water supply.

Treatment Facility Summary				
<b>Treatment Facility Name:</b> Gibble Foods				
<b>WQM Permit No.</b>		<b>Issuance Date</b>		
2814402		06/20/2014		
<b>Waste Type</b>	<b>Degree of Treatment</b>	<b>Process Type</b>	<b>Disinfection</b>	<b>Avg Annual Flow (MGD)</b>
Sewage	Secondary	Septic Tank Sand Filter	Chlorine With Dechlorination	0.001
<b>Hydraulic Capacity (MGD)</b>	<b>Organic Capacity (lbs/day)</b>	<b>Load Status</b>	<b>Biosolids Treatment</b>	<b>Biosolids Use/Disposal</b>
0.001		Not Overloaded	Anaerobic Digestion	Other WWTP

HSG owns and operates a small flow treatment facility serving sanitary wastewater generated from a snack food manufacturing plant located in Antrim Township, Franklin County. This small flow treatment facility is designed to treat up to 0.001 MGD and consists of septic tanks (2) with Zabel effluent filter, dosing tank, Ecoflo peat filters (2), chlorine contact tank, tablet de-chlorinator and outfall structure. Calcium hypochlorite tablets are used for disinfection and sodium sulfite tablets are used for dechlorination.

Any industrial wastewater generated from this facility is land applied as residual waste under DEP Waste Management Program.

The facility also utilized a stormwater outfall, Outfall 002. During a site visit conducted on July 10, 2019, DEP recognized that there is potentially no exposure of industrial activities and materials, other than parking lots and dumpster, to stormwater runoff that would potentially be discharged via this outfall. HSG also submitted DEP's no-exposure certification form indicating that none of materials are stored outdoors.

Compliance History	
<b>Summary of DMRs:</b>	A summary of past 12-month DMR is presented on the next page.
<b>Summary of Inspections:</b>	07/10/2019: Michael Benham, DEP Water Quality Specialist, conducted a routine inspection and noted that the facility was in violation of the permit due to failure to complete sampling requirements or an annual inspection in lieu of sampling. Only a small amount of flow was present at the outfall.  03/13/2018: Patrick Bowen, former DEP Water Quality Specialist, conducted a routine inspection. No issues were identified at the time of inspection.
<b>Other Comments:</b>	A notice of violation (NOV) was sent on March 28, 2019 for failure to submit DMRs through the eDMR system.  There is currently no open violation associated with this facility or permittee.

Effluent Data

DMR Data for Outfall 001 (from December 1, 2018 to November 30, 2019)

Parameter	NOV-19	OCT-19	SEP-19	AUG-19	JUL-19	JUN-19	MAY-19	APR-19	MAR-19	FEB-19	JAN-19	DEC-18
Flow (MGD) Average Monthly	0.0001	0.0001	0.00011 9	0.00012	0.00008 5	0.0001	0.00037	0.00016	0.00003	0.00033	0.00015	0.00013
Flow (MGD) Daily Maximum	0.00024	0.0002	0.00036	0.00022	0.00022	0.0001	0.0012	22	0.00029	0.00033	0.00015	0.00019
pH (S.U.) Minimum	6.1	6.8	6.1	6.2	6.2	7.2	6.3	6.8	6.7	7.4	6.7	6.7
pH (S.U.) Instantaneous Maximum	7.2	7.4	7.5	7.6	7.7	7.5	7.8	7.9	8.1	8.0	7.8	7.9
DO (mg/L) Minimum	8.0	5.2	6.3	6.3	5.9	8.4	8.4	10.0	10.8	11.9	11.4	10.8
TRC (mg/L) Average Monthly	< 0.02	< 0.1	< 0.1	< 0.1	< 0.2	< 0.1	< 0.1	0.1	0.1	0.13	0.13	0.24
TRC (mg/L) Instantaneous Maximum	0.11	0.52	0.65	0.26	1.42	0.43	0.32	0.81	1.5	0.76	1.38	1.04
CBOD5 (mg/L) Average Monthly	6.52	2.0	10.9	5.3	4.3	< 2.0	15.5	2.4	5.2	8.0	8.0	5.3
TSS (mg/L) Average Monthly	10.0	10.0	17.5	1.5	11.5	9.0	8.0	6.5	9.0	7.0	< 5.0	6.0
Fecal Coliform (CFU/100 ml) Geometric Mean	< 1	< 1	< 1	1	2	3	< 1	< 1	< 1	< 1	< 1	< 1
Fecal Coliform (CFU/100 ml) Instantaneous Maximum	< 1	< 1	< 1	1	2	3	< 1	< 1	< 1	< 1	< 1	< 1

**Existing Effluent Limits and Monitoring Requirements**

A table below summarizes effluent limits and monitoring requirements specified in the existing permit:

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Average Monthly	Daily Maximum	Minimum	Average Monthly		Instant. Maximum		
Flow (MGD)	Report	Report	XXX	XXX	XXX	XXX	Continuous	Measured
pH (S.U.)	XXX	XXX	6.0	XXX	XXX	9.0	1/day	Grab
Dissolved Oxygen	XXX	XXX	5.0	XXX	XXX	XXX	1/day	Grab
Total Residual Chlorine	XXX	XXX	XXX	0.5	XXX	1.6	1/day	Grab
CBOD5	XXX	XXX	XXX	25	XXX	50	1/month	Grab
Total Suspended Solids	XXX	XXX	XXX	30	XXX	60	1/month	Grab
Fecal Coliform (CFU/100 ml) May 1 - Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1,000	1/month	Grab
Fecal Coliform (CFU/100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	2,000 Geo Mean	XXX	10,000	1/month	Grab

**Development of Effluent Limitations and Monitoring Requirements**

<b>Outfall No.</b>	<u>001</u>	<b>Design Flow (MGD)</b>	<u>.001</u>
<b>Latitude</b>	<u>39° 50' 47.00"</u>	<b>Longitude</b>	<u>-77° 43' 6.00"</u>
<b>Wastewater Description:</b>	<u>Sewage Effluent</u>		

As this facility is now recognized by DEP as a small flow treatment facility, a table from DEP's SOP no. BCW-PMT-003 will be used as guidance to develop effluent limits and monitoring requirements for the upcoming permit renewal. As recommended by this SOP, all existing minimum measurement frequency has changed to 1/month. This approach is appropriate also because the facility has not had any effluent violations over the past 3 years.

**Flow**

The requirement to monitor for the effluent volume will remain in the permit per 40 CFR § 122.44(i)(1)(ii).

**pH & Dissolved Oxygen**

DEP's SOP does not include pH and DO effluent limits. It is noteworthy that the requirements in this SOP are minimum requirements for typical small flow treatment facilities. A review of the past 12-month DMR data indicates highly fluctuated effluent levels of pH and DO. The existing pH and DO effluent limits will be maintained in the permit as DEP has determined that the removal or relaxation of these limits are not warranted under 40 CFR §122.44(l)(1).

**Total Residual Chlorine**

DEP's TRC\_CALC worksheet indicates that the existing effluent limit of 0.5 mg/L (average monthly) is still appropriate. No change is recommended. This existing effluent limit of 0.5 mg/L is a BAT limit derived from 25 Pa Code §92a.48(b)(2). The existing instantaneous maximum limit will also remain unchanged and is derived from the worksheet.

**CBOD5 and Total Suspended Solids**

While DEP's SOP recommends more stringent effluent limits for CBOD5 and TSS, this SOP also does not recommend these limits to be imposed when the facility is not capable of meeting these limits. Based on a review of the past 12-month DMR data, it is unclear to determine if the facility is capable of meeting these stringent limits even though Ecoflo peat filters are known to produce effluent CBOD5 and TSS levels of 10 mg/L. No changes are therefore recommended.

**Fecal Coliform**

The facility is well capable of meeting a year-round effluent limit of 200 / 100 mL which is recommended by the SOP. This limit will therefore replace the existing seasonal effluent limits.

**Part C Condition**

Outfall 002 receives stormwater runoff drained from the entire site. The existing permit contains stormwater monitoring requirements. It is determined that the facility has not monitored stormwater runoff. HSG submitted a no-exposure certification form indicating that there is no exposure of industrial activities and materials to stormwater. With this form, HSG submitted sample results of stormwater runoff. These results are Oil/Grease of < 5 mg/L, BOD5 of 2.26 mg/L, COD of 19 mg/L, TSS of 3 mg/L, TN of < 0.5 mg/, TP of < 0.05 mg/L, pH of 3.31 SU, and Total Iron of 0.07 mg/L. DEP determines that the facility is eligible for no exposure certification and is not required to perform stormwater monitoring. However, it is recommended that a condition be included in Part C to require this facility to submit a no-exposure certification form with the subsequent renewal application.

**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) <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		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	1/month	Measured
pH (S.U.)	XXX	XXX	6.0	XXX	XXX	9.0	1/month	Grab
DO	XXX	XXX	5.0	XXX	XXX	XXX	1/month	Grab
TRC	XXX	XXX	XXX	0.5	XXX	1.6	1/month	Grab
CBOD5	XXX	XXX	XXX	25	XXX	50	1/month	Grab
TSS	XXX	XXX	XXX	30	XXX	60	1/month	Grab
Fecal Coliform	XXX	XXX	XXX	200	XXX	XXX	1/month	Grab

Tools and References Used to Develop Permit	
<input type="checkbox"/>	WQM for Windows Model (see Attachment [redacted])
<input type="checkbox"/>	PENTOXSD for Windows Model (see Attachment [redacted])
<input type="checkbox"/>	TRC Model Spreadsheet (see Attachment [redacted])
<input type="checkbox"/>	Temperature Model Spreadsheet (see Attachment [redacted])
<input type="checkbox"/>	Toxics Screening Analysis Spreadsheet (see Attachment [redacted])
<input type="checkbox"/>	Water Quality Toxics Management Strategy, 361-0100-003, 4/06.
<input type="checkbox"/>	Technical Guidance for the Development and Specification of Effluent Limitations, 362-0400-001, 10/97.
<input type="checkbox"/>	Policy for Permitting Surface Water Diversions, 362-2000-003, 3/98.
<input type="checkbox"/>	Policy for Conducting Technical Reviews of Minor NPDES Renewal Applications, 362-2000-008, 11/96.
<input type="checkbox"/>	Technology-Based Control Requirements for Water Treatment Plant Wastes, 362-2183-003, 10/97.
<input type="checkbox"/>	Technical Guidance for Development of NPDES Permit Requirements Steam Electric Industry, 362-2183-004, 12/97.
<input type="checkbox"/>	Pennsylvania CSO Policy, 385-2000-011, 9/08.
<input type="checkbox"/>	Water Quality Antidegradation Implementation Guidance, 391-0300-002, 11/03.
<input type="checkbox"/>	Implementation Guidance Evaluation & Process Thermal Discharge (316(a)) Federal Water Pollution Act, 391-2000-002, 4/97.
<input type="checkbox"/>	Determining Water Quality-Based Effluent Limits, 391-2000-003, 12/97.
<input type="checkbox"/>	Implementation Guidance Design Conditions, 391-2000-006, 9/97.
<input type="checkbox"/>	Technical Reference Guide (TRG) WQM 7.0 for Windows, Wasteload Allocation Program for Dissolved Oxygen and Ammonia Nitrogen, Version 1.0, 391-2000-007, 6/2004.
<input type="checkbox"/>	Interim Method for the Sampling and Analysis of Osmotic Pressure on Streams, Brines, and Industrial Discharges, 391-2000-008, 10/1997.
<input type="checkbox"/>	Implementation Guidance for Section 95.6 Management of Point Source Phosphorus Discharges to Lakes, Ponds, and Impoundments, 391-2000-010, 3/99.
<input type="checkbox"/>	Technical Reference Guide (TRG) PENTOXSD for Windows, PA Single Discharge Wasteload Allocation Program for Toxics, Version 2.0, 391-2000-011, 5/2004.
<input type="checkbox"/>	Implementation Guidance for Section 93.7 Ammonia Criteria, 391-2000-013, 11/97.
<input type="checkbox"/>	Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers, 391-2000-014, 4/2008.
<input type="checkbox"/>	Implementation Guidance Total Residual Chlorine (TRC) Regulation, 391-2000-015, 11/1994.
<input type="checkbox"/>	Implementation Guidance for Temperature Criteria, 391-2000-017, 4/09.
<input type="checkbox"/>	Implementation Guidance for Section 95.9 Phosphorus Discharges to Free Flowing Streams, 391-2000-018, 10/97.
<input type="checkbox"/>	Implementation Guidance for Application of Section 93.5(e) for Potable Water Supply Protection Total Dissolved Solids, Nitrite-Nitrate, Non-Priority Pollutant Phenolics and Fluorides, 391-2000-019, 10/97.
<input type="checkbox"/>	Field Data Collection and Evaluation Protocol for Determining Stream and Point Source Discharge Design Hardness, 391-2000-021, 3/99.
<input type="checkbox"/>	Implementation Guidance for the Determination and Use of Background/Ambient Water Quality in the Determination of Wasteload Allocations and NPDES Effluent Limitations for Toxic Substances, 391-2000-022, 3/1999.
<input type="checkbox"/>	Design Stream Flows, 391-2000-023, 9/98.
<input type="checkbox"/>	Field Data Collection and Evaluation Protocol for Deriving Daily and Hourly Discharge Coefficients of Variation (CV) and Other Discharge Characteristics, 391-2000-024, 10/98.
<input type="checkbox"/>	Evaluations of Phosphorus Discharges to Lakes, Ponds and Impoundments, 391-3200-013, 6/97.
<input type="checkbox"/>	Pennsylvania's Chesapeake Bay Tributary Strategy Implementation Plan for NPDES Permitting, 4/07.
<input type="checkbox"/>	SOP: [redacted]
<input type="checkbox"/>	Other: [redacted]