pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Northcentral Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0115215**
Facility Type	**Industrial**	APS ID	**977504**
Major / Minor	**Minor**	Authorization ID	**1245980**

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

Applicant and Facility Information

Applicant Name	**Lucas Trucking Corp.**	Facility Name	**Lucas Trucking**
Applicant Address	9657 N Route 220 Highway	Facility Address	9657 N Route 220 Highway
	Jersey Shore, PA 17740-7897		Jersey Shore, PA 17740-7897
Applicant Contact	Robert Fidler	Facility Contact	James Lucas
Applicant Phone	(570) 398-2620	Facility Phone	(570) 395-2620
Client ID	184	Site ID	262943
SIC Code	4212	Municipality	Piatt Township
SIC Description	Trans. & Utilities - Local Trucking, Without Storage	County	Lycoming
Date Application Received	September 11, 2018	EPA Waived?	No.
Date Application Accepted	October 1, 2018	If No, Reason	TMDL Watershed with WLA.

Purpose of Application: Application for the renewal of the existing individual NPDES permit.

Summary of Review

Lucas Trucking Corp. has submitted an application for the renewal of the existing NPDES Permit PA0115215 for the Department's review. 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.

The Lucas Trucking Corp. facility discharges treated effluent from an oil water separator. The waste is generated from truck wash water, shop floor drain, a fuel pad, and some stormwater run-off. Outfall 001 discharges treated wastewater intermittently as needed. For stormwater, the duration of discharge is intermittent based on precipitation events.

Approve	Deny	Signatures	Date
X		Jonathan P. Peterman / Project Manager	August 15, 2019
		Nicholas W. Hartranft, P.E. / Environmental Engineer Manager	

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	001	Design Flow (MGD)	0.0072
Latitude	41º 12' 51.53"	Longitude	-77º 12' 54.38"
Quad Name	Linden	Quad Code	0928
Wastewater Description:	IW Process Effluent without ELG		
Receiving Waters	UNT to West Branch Susquehanna River (WWF)	Stream Code	18668
NHD Com ID	66916767	RMI	52
Drainage Area	5,682	Yield (cfs/mi^2)	0.101
Q_{7-10} Flow (cfs)	578	Q_{7-10} Basis	Stream Gage No. 01551500
Elevation (ft)	510	Slope (ft/ft)	
Watershed No.	10-A	Chapter 93 Class.	WWF
Existing Use	WWF	Existing Use Qualifier	N/A
Exceptions to Use	None.	Exceptions to Criteria	None.
Assessment Status	Impaired		
Cause(s) of Impairment	POLYCHLORINATED BIPHENYLS (PCBS)		
Source(s) of Impairment	SOURCE UNKNOWN		
TMDL Status	Final, 12/3/2011	Name	West Branch Susquehanna
Nearest Downstream Public Water Supply Intake	PA American Water (Milton)		
PWS Waters	West Branch Susquehanna River	Flow at Intake (cfs)	West Branch Susquehanna River
PWS RMI	10.5	Distance from Outfall (mi)	10.5

Changes Since Last Permit Issuance: None.

Other Comments: Given the nature of the effluent, the design effluent limitations being implemented, the minimal volume of discharge, and the distance from the outfall to the water intake, this facility is expected to have no impact on the public water supply. Given that this facility discharges to a dry stream, it has been determined that the West Branch Susquehanna River shall be used as the point of first use. The updated Q_{7-10} data was obtained from the updated stream gage information obtained from *Stuckey, M.H., and Roland, M.A., 2011, Selected Streamflow Statistics for Streamgage Locations In and Near Pennsylvania*. Given that the associated stream gage (01551500) is located in a close proximity downstream, no comparative gage analysis is needed. The flows measured at the gage will be used directly and will be conservative.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	002	Design Flow (MGD)	N/A
Latitude	41º 12' 51.53"	Longitude	-77º 12' 54.38"
Quad Name	Linden	Quad Code	0928
Wastewater Description:	Stormwater		
Receiving Waters	UNT to West Branch Susquehanna River (WWF)	Stream Code	18668
NHD Com ID	66916767	RMI	52
Drainage Area	5,682	Yield (cfs/mi^2)	0.101
Q_{7-10} Flow (cfs)	578	Q_{7-10} Basis	Stream Gage No. 01551500
Elevation (ft)	510	Slope (ft/ft)	
Watershed No.	10-A	Chapter 93 Class.	WWF
Existing Use	WWF	Existing Use Qualifier	N/A
Exceptions to Use	None.	Exceptions to Criteria	None.
Assessment Status	Impaired		
Cause(s) of Impairment	POLYCHLORINATED BIPHENYLS (PCBS)		
Source(s) of Impairment	SOURCE UNKNOWN		
TMDL Status	Final, 12/3/2011	Name	West Branch Susquehanna
Nearest Downstream Public Water Supply Intake	PA American Water (Milton)		
PWS Waters	West Branch Susquehanna River	Flow at Intake (cfs)	728
PWS RMI	10.5	Distance from Outfall (mi)	42

Changes Since Last Permit Issuance: None.

Other Comments: None.

Treatment Facility Summary

Treatment Facility Name: Lucas Trucking Corp.
Treatment System Components:
- One (1) 2,000 Gallon Oil Water Separator.
- One (1) Activated Carbon Filter.
- One (1) Outfall 001 – Separator Effluent.
- One (1) Outfall 002 - Stormwater.

TMDL Discussion

The Department's Geographic Information System (GIS) shows that the West Branch Susquehanna River is impaired and a TMDL exists for the stream segment for metals and pH due to AMD. The TMDL addresses the three primary metals associated with abandoned mine drainage (iron, aluminum, and manganese) and acidity. A Waste Load Allocation (WLA) was developed for Lucas Trucking Corp. in the TMDL as follows:

Table D186. WLA at Lucas Trucking Corp.

Parameter			
Outfall 001	***Monthly Average Conc. (mg/L)***	***Design Flow (MGD)***	***Allowable Load (lbs/day)***
Fe	0.01	0.0072	0.001

Effluent limits for iron will be assigned accordingly.

Chesapeake Bay Requirements

This facility is classified as a "non-significant" IW given that the gross effluent discharges do not exceed 75 lbs/day of TN or 25 lbs/day of TP. The permittee will be required to monitor and report TN and TP throughout the permit term in accordance with the Phase II WIP Chesapeake Bay Strategy for non-significant industrial waste facilities. Non-significant IW dischargers should receive monitoring requirements in permits if there is any possibility of a net increase in nutrients as a result of facility processes, and monitoring frequencies should be established using the general guidance in the Phase II WIP Supplement. Even though BMPs stipulate that detergents should not be used during pressure washing, there is potential that these products could be used and thus cause a net increase in TP. Yearly monitoring for TN and TP will remain.

Existing Effluent Limitations and Monitoring Requirements

Existing Limits – Outfall 001

	Limitations							
	Mass (lb/day)		Concentration (mg/L)				Monitoring	
Discharge Parameter	Monthly Average	Daily Maximum	Minimum	Average Monthly	Daily Maximum	Instantaneous Maximum	Minimum Frequency	Sample Type
Flow (MGD)	Report	Report					1/ Week	Estimate
pH (Std. Units)			6.0			9.0	1/ Month	Grab
Total Petroleum Hydrocarbons					Report		1/ Year	Grab
Oil & Grease				15		30	1/ Month	Grab
Total Iron	0.001			0.01			1/ Month	Grab
Total Aluminum				Report	Report		1/ Year	Grab
Total Manganese				Report	Report		1/ Year	Grab
Total Nitrogen	Report Annual Average			Report Annual Average			1/ Year	Grab
Total Phosphorus	Report Annual Average			Report Annual Average			1/ Year	Grab

*These effluent limits for Outfall 001 are based on a design flow of 0.0072 MGD.

Development of Effluent Limitations

Outfall No. 001 **Design Flow (MGD)** .0072
Latitude 41º 13' 2.21" **Longitude** -77º 12' 48.05"
Wastewater Description: IW Process Effluent without ELG

Technology-Based Limitations

The following technology-based limitations apply, subject to water quality analysis and BPJ where applicable:

Parameter	Limit (mg/l) (Average Monthly)	Limit (mg/l) (Daily Maximum)	Limit (mg/l) (Inst. Maximum)	Federal Regulation	State Regulation
Oil & Grease	15	-	30	-	95.2(2)(ii)
pH	6-9 at all times	-		§133.102(c)	§95.2

Comments: None.

Water Quality-Based Limitations

To establish whether or not water-quality based effluent limitations (WQBELs) are required, the Department models in-stream conditions. In order to determine limitations for toxics, the Department utilizes the PENTOXSD v2.0d model. The use of a WQM7.0 analysis is not required for this discharge type.

A “Reasonable Potential Analysis” could not be conducted given that there is no discharge information. Outfall 001 has not discharged during the previous permit term. Therefore, no parameters are candidates for monitoring or limitations beyond any existing effluent limits.

Comments: None.

Best Professional Judgement (BPJ) Limitations

Comments: See Total Petroleum Hydrocarbons and stormwater parameters.

Anti-Backsliding

In accordance with 40 CFR 122.44(l)(1) and (2), this permit does not contain effluent limitations, standards, or conditions that are less stringent than the previous permit.

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 the abovementioned 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) and/or BPJ.

Proposed Limits - Outfall 001, Effective Period: Permit Effective Date through Permit Expiration Date

	Limitations							
	Mass (lb/day)		Concentration (mg/L)				Monitoring	
Discharge Parameter	Monthly Average	Daily Maximum	Minimum	Average Monthly	Daily Maximum	Instantaneous Maximum	Minimum Frequency	Sample Type
Flow (MGD)	Report	Report					1/ Week	Estimate
pH (Std. Units)			6.0			9.0	1/ Month	Grab
Total Petroleum Hydrocarbons					Report		1/ Year	Grab
Oil & Grease				15		30	1/ Month	Grab
Total Iron	0.001			0.01			1/ Month	Grab
Total Aluminum	Report Annual Average			Report Annual Average			1/ Year	Grab
Total Manganese	Report Annual Average			Report Annual Average			1/ Year	Grab
Total Nitrogen	Report Annual Average			Report Annual Average			1/ Year	Grab
Total Phosphorus	Report Annual Average			Report Annual Average			1/ Year	Grab

*These effluent limits for Outfall 001 are based on a design flow of 0.0072 MGD.

Flow
The existing monitoring frequency (Estimate) is appropriate for this type of facility and will remain.

pH
CFR Title 40 §133.102(c) and 25 PA Code §95.2(1) provide the basis of effluent limitations for pH.

Oil & Grease
25 PA Code §95.2(2)(ii) provide the basis of effluent limitations for oil and grease.

Total Petroleum Hydrocarbons
Previous permits included monitoring of this parameter based on best professional judgment without justification. The oil water separator will be treating effluent from the shop floor drains, truck washing area, and the fuel pad. It can be reasonably determined that there is a potential for petroleum products to be discharged in which this parameter will indicate said discharges. Monitoring for this parameter will remain.

Total Iron
Effluent limits for Iron are required by the TMDL which indicates that monitoring data was used to achieve the associated WLA for this facility. This limit will remain.

Total Aluminum & Total Manganese
Due to the existing impairment of the receiving stream and the associated TMDL, yearly monitoring of these metals will remain (at least until a discharge sample is collected) to ensure that the facility is not contributing to the impairment. Given the regulations contained in 40 CFR §122.44(d)(1)(ii)&(iii), the Department will ensure that the effluent from this

facility has no "Reasonable potential to cause, or contributes to an in-stream excursion above the allowable ambient concentration of a State numeric criteria within a State water quality standard for an individual pollutant."

Given that there is no history of non-compliance with effluent limitations over the past two years according to DMR data, and the existing monitoring frequencies are less stringent than Table 6-4, the existing frequencies may be continued in the renewed permit.

Stormwater Requirements

The industrial activities associated with Lucas Trucking Corp. are identified in 40 CFR 122.26(b)(14)(ix) and thus the facility required to obtain an NPDES permit to discharge stormwater into waters of the Commonwealth of Pennsylvania. The facility is classified under SIC Code 4212- Establishments primarily engaged in furnishing trucking or transfer services without storage for freight generally weighing more than 100 pounds, in a single municipality, contiguous municipalities, or a municipality and its suburban areas. SIC code major group 4212 is under the coverage of Appendix L. For that reason, General Stormwater (PAG-03) Appendix L Monitoring Requirements and Best Management Practices (BMPs) have been assigned.

Outfall No. 002 **Design Flow (MGD)** N/A
Latitude 41° 13' 04.00" **Longitude** 77° 12' 50.00"
Wastewater Description: Stormwater

Outfall 002, Effective Period: Permit Effective Date through Permit Expiration Date

	Limitations							
	Mass (lb/day)		Concentration (mg/L)				Monitoring	
Discharge Parameter	Monthly Average	Daily Maximum	Minimum	Average Monthly	Daily Maximum	Instantaneous Maximum	Minimum Frequency	Sample Type
$CBOD_5$					Report		1/ Year	Grab
COD					Report		1/ Year	Grab
Oil & Grease					Report		1/ Year	Grab
pH					Report		1/ Year	Grab
TSS					Report		1/ Year	Grab
Total Kjeldahl Nitrogen					Report		1/ Year	Grab
Total Phosphorus					Report		1/ Year	Grab
Dissolved Iron					Report		1/ Year	Grab

*These effluent limits for Outfall 002 are not based on a design flow.

TSS & Dissolved Iron
Monitoring for these parameters are the minimum requirements set forth by DEP for this particular type of facility in Appendix L. There are no ELG's associated with this facility type.

CBOD5, COD, Oil & Grease, pH, Total Phosphorus, Total Kjeldahl Nitrogen,
Given the chemicals and petroleum products contained on-site, the inclusion of these parameters shall remain based upon Best Professional Judgment (BPJ).

The monitoring frequencies and sample types are based upon the minimum requirements for Appendix L facilities.

Part C of the permit will contain following requirements for this stormwater facility:
1. Stormwater Annual Report
2. Best Management Practices (BMPs)
3. Routine Inspections
4. Preparedness, Prevention and Contingency (PPC) Plan
5. Stormwater Monitoring Requirements

Compliance History

Summary of Inspections -The last inspection of the facility was conducted on 3/15/19 by John Springer which reveals that the facility was operating normally. However, the Annual Inspection Form for NPDES Permits for Discharges of Stormwater Associated with Industrial Activities was not submitted as required.

WMS Query Summary - A WMS Query was run at *Reports - Violations & Enforcements – Open Violations for Client Report* to determine whether there are any unresolved violations associated with the client that will affect issuance of the permit (per CSL Section 609). This query revealed no open violations.

DMRs Summary -Upon review of the DMR's for the past year, the facility generally has been operating within the benchmark values for stormwater. Additionally, there was no discharge reported in 2018.

Other Comments: None.

Attachments

Attachments

Compliance History

DMR Data for Outfall 001 (from June 1, 2018 to May 31, 2019)

N/A (No Discharge)

DMR Data for Outfall 002 (from June 1, 2018 to May 31, 2019)

Parameter	DEC-18
pH (mg/L) Daily Maximum	7.56
CBOD5 (mg/L) Daily Maximum	< 3
COD (mg/L) Daily Maximum	< 20
TSS (mg/L) Daily Maximum	14
Oil and Grease (mg/L) Daily Maximum	< 5.1
TKN (mg/L) Daily Maximum	1.11
Total Phosphorus (mg/L) Daily Maximum	< 0.0500
Total Aluminum (mg/L) Daily Maximum	0.156
Dissolved Iron (mg/L) Daily Maximum	< 0.0500
Total Manganese (mg/L) Daily Maximum	< 0.0100

Tools and References Used to Develop Permit	
☐	WQM for Windows Model (see Attachment)
☐	PENTOXSD for Windows Model (see Attachment)
☐	TRC Model Spreadsheet (see Attachment)
☐	Temperature Model Spreadsheet (see Attachment)
☐	Toxics Screening Analysis Spreadsheet (see Attachment)
☐	Water Quality Toxics Management Strategy, 361-0100-003, 4/06.
☒	Technical Guidance for the Development and Specification of Effluent Limitations, 362-0400-001, 10/97.
☐	Policy for Permitting Surface Water Diversions, 362-2000-003, 3/98.
☒	Policy for Conducting Technical Reviews of Minor NPDES Renewal Applications, 362-2000-008, 11/96.
☒	Technology-Based Control Requirements for Water Treatment Plant Wastes, 362-2183-003, 10/97.
☐	Technical Guidance for Development of NPDES Permit Requirements Steam Electric Industry, 362-2183-004, 12/97.
☐	Pennsylvania CSO Policy, 385-2000-011, 9/08.
☐	Water Quality Antidegradation Implementation Guidance, 391-0300-002, 11/03.
☐	Implementation Guidance Evaluation & Process Thermal Discharge (316(a)) Federal Water Pollution Act, 391-2000-002, 4/97.
☒	Determining Water Quality-Based Effluent Limits, 391-2000-003, 12/97.
☐	Implementation Guidance Design Conditions, 391-2000-006, 9/97.
☐	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.
☐	Interim Method for the Sampling and Analysis of Osmotic Pressure on Streams, Brines, and Industrial Discharges, 391-2000-008, 10/1997.
☐	Implementation Guidance for Section 95.6 Management of Point Source Phosphorus Discharges to Lakes, Ponds, and Impoundments, 391-2000-010, 3/99.
☒	Technical Reference Guide (TRG) PENTOXSD for Windows, PA Single Discharge Wasteload Allocation Program for Toxics, Version 2.0, 391-2000-011, 5/2004.
☐	Implementation Guidance for Section 93.7 Ammonia Criteria, 391-2000-013, 11/97.
☐	Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers, 391-2000-014, 4/2008.
☒	Implementation Guidance Total Residual Chlorine (TRC) Regulation, 391-2000-015, 11/1994.
☐	Implementation Guidance for Temperature Criteria, 391-2000-017, 4/09.
☐	Implementation Guidance for Section 95.9 Phosphorus Discharges to Free Flowing Streams, 391-2000-018, 10/97.
☐	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.
☐	Field Data Collection and Evaluation Protocol for Determining Stream and Point Source Discharge Design Hardness, 391-2000-021, 3/99.
☐	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.
☒	Design Stream Flows, 391-2000-023, 9/98.
☐	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.
☐	Evaluations of Phosphorus Discharges to Lakes, Ponds and Impoundments, 391-3200-013, 6/97.
☐	Pennsylvania's Chesapeake Bay Tributary Strategy Implementation Plan for NPDES Permitting, 4/07.
☐	SOP:
☐	Other: