pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0205656**
Facility Type	**Industrial**	APS ID	**1067954**
Major / Minor	**Minor**	Authorization ID	**1404074**

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

Applicant and Facility Information

Applicant Name	**Watco Transloading LLC**	Facility Name	**WTPS Dravosburg Terminal**
Applicant Address	702 Washington Avenue	Facility Address	702 Washington Avenue
	Dravosburg, PA 15034-1348		Dravosburg, PA 15034-1348
Applicant Contact	Jason Noll	Facility Contact	Same as Applicant
Applicant Phone	(412) 466-4100	Facility Phone	Same as Applicant
Client ID	317682	Site ID	240405
SIC Code	5171	Municipality	Dravosburg Borough
SIC Description	Wholesale Trade - Petroleum Bulk Stations and Terminals	County	Allegheny
Date Application Received	July 21, 2022	EPA Waived?	Yes
Date Application Accepted	July 25, 2022	If No, Reason	

Purpose of Application: Renewal application for discharge of stormwater and hydrostatic test water

Summary of Review

The Department received a renewal application from CORE Environmental Services, Inc on behalf of Watco Transloading LLC for their WTPS Dravosburg Terminal in Dravosburg Borough of Allegheny County. The site is a bulk storage facility for petroleum products. The facility houses multiple aboveground storage tanks that store petroleum products prior to being loaded onto tanker trucks to be distributed to individual petroleum stations. Products are received by truck, rail, and barge via the Monongahela River. The site has an SIC code of 5171 (Petroleum Bulk Stations and Terminals).

The site has one outfall that discharges to the Monongahela River, designated in 25 PA Code Chapter 93 as a Warm Water Fisher. Outfall 001 discharges stormwater and hydrostatic test water. All stormwater travels through an oil water separator (OWS) before being discharged through Outfall 001. The discharge of hydrostatic test waters should not occur at the same time as a storm event so that the testing can be isolated and will not be blended or diluted. The discharge of hydrostatic test water will be regulated at internal monitoring point, IMP 101. There are no other discharges from the site.

The site was last inspected on April 13, 2018, no violations were noted. The permittee has no open violations.

Draft Permit issuance is recommended.

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

Approve	Deny	Signatures	Date
X		Adam Olesnanik / Project Manager	7/29/2022
X		Michael E. Fifth, P.E. / Environmental Engineer Manager	7/29/2022

Summary of Review
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)	0.432
Latitude	40º 21’ 13"	Longitude	-79º 52' 50"
Quad Name	Glassport	Quad Code	1606
Wastewater Description:	Stormwater, Hydrostatic Test Water (IMP 101)		

Receiving Waters	Monongahela River	Stream Code	37185
NHD Com ID	99408226	RMI	16.25
Drainage Area	5410	Yield (cfs/mi^2)	0.1017
Q_{7-10} Flow (cfs)	550	Q_{7-10} Basis	USGS StreamStats
Elevation (ft)	718	Slope (ft/ft)	0.0009
Watershed No.	19-C	Chapter 93 Class.	WWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	PCB		
Source(s) of Impairment	Source Unknown		
TMDL Status	Final	Name	Monongahela River TMDL

Nearest Downstream Public Water Supply Intake	PA American Water Company Pittsburgh		
PWS Waters	Monongahela River	Flow at Intake (cfs)	1,230
PWS RMI	4.6	Distance from Outfall (mi)	11.65

Development of Effluent Limitations

Outfall No. 001 **Design Flow (MGD)** 0.432
Latitude 40º 21' 13" **Longitude** -79º 52' 50"
Wastewater Description: Hydrostatic Test Water, Stormwater

Technology-Based Limitations

Stormwater Technology Limits

Outfall 001 will be subject to PAG-03 General Stormwater Permit conditions as a minimum requirement because the outfall receives stormwater. The SIC code for the site is 5171 (Petroleum Bulk Stations and Terminals) and the corresponding appendix of the PAG-03 that would apply to the facility is Appendix L (Land Transportation and Petroleum Stations and Terminals). The reporting requirements applicable to stormwater discharges are shown in Table 1 below. Along with the monitoring requirements, sector specific BMPs included in Appendix L of the PAG-03 will also be included in Part C of the Draft Permit. The benchmark values list below are not effluent limitation, and exceedances so not constitutes permit violations. However, if the permittee's sampling demonstrates exceedances of benchmark values for two consecutive monitoring periods, the permit shall submit a corrective action plan. This requirement will be included in Part C of the permit.

Table 1: PAG-03 Appendix (L) Monitoring Requirements

Parameters	Max Daily Concentration	Benchmark Values
Total Suspended Solids (TSS) (mg/L)	Monitor and Report	100.0
Oil and Grease (mg/L)	Monitor and Report	30.0

Water Quality-Based Limitations

Stormwater WQBELs

Water quality analyses are typically performed under low-flow (Q7-10) conditions. Stormwater discharges occur at variable rates and frequencies but not however during Q7-10 conditions. Since the discharge from Outfall 001 is composed entirely of stormwater, a formal water quality analysis cannot be accurately conducted. Accordingly, water quality-based effluent limitations based on water quality analyses are not proposed.

Anti-Backsliding

The limitations in the site's current permit can be used pursuant to EPA's anti-backsliding regulation, 40 CFR 122.44(l) and are displayed in Table 2 below.

Table 2: Limitations in the Current Permit

Parameter	Daily Max.	Sample Frequency	Sample Type
Flow (GPM)	Report	1/quarter	Measured
Oil and Grease (mg/L)	15.0	1/quarter	Grab
pH (STU)	Report	1/quarter	Grab
Dissolved Iron (mg/L)	7.0	1/quarter	Grab
Total Suspended Solids (TSS) (mg/L)	Report	1/quarter	Grab

Proposed Effluent Limitations and Monitoring Requirements

The proposed effluent monitoring requirements for Outfall 001 are displayed in Table 3 below, they are the most stringent values from the above effluent limitation development. Part C of the Draft Permit requires a Corrective Action Plan whenever there are two consecutive exceedances of the stormwater benchmark values. The benchmark values are displayed below in Table 3. These values are not effluent limitations, an exceedance of the benchmark value is not a violation. As described above, if there are two consecutive exceedances of a benchmark value, a Corrective Action Plan must be developed and submitted to the Department to evaluate site stormwater controls and implement BMP improvements. Benchmark monitoring is a feedback tool, along with routine and visual inspections, for assessing the effectiveness of stormwater controls and BMPs. An exceedance of the benchmark value provides permittees with an indication that the facility's controls may not be sufficiently controlling pollutants in stormwater.

Table 3: Proposed Limitations for Outfall 001

Parameter	Daily Max.	Benchmark Values	Sample Frequency	Sample Type
Flow (GPM)	Report	XXX	1/quarter	Measured
Oil and Grease (mg/L)	15.0	XXX	1/quarter	Grab
pH (STU)	Report	XXX	1/quarter	Grab
Dissolved Iron (mg/L)	7.0	XXX	1/quarter	Grab
Total Suspended Solids (TSS) (mg/L)	Report	100.0	1/quarter	Grab

Development of Effluent Limitations

Outfall No. 101 **Design Flow (MGD)** 0.367
Latitude 40º 21' 13.00" **Longitude** -79º 52' 50.00"
Wastewater Description: Hydrostatic Test Water

Technology-Based Limitations

Hydrostatic test water discharge from petroleum storage tanks is also addressed in PAG-10 General Permit. The concentration limits for hydrostatic test water from the general permit are shown in Table 4.

Table 4. Technology based effluent limits for hydrostatic test water

Parameter	Minimum	Average Monthly	Instantaneous Maximum
Flow (GPM)		Report	
Duration (hours)		Report	
Total Volume Discharged (Gallons)		Report Total Monthly	
Dissolved Oxygen (mg/L)	5.0		
pH (standard units)	6.0		9.0
Total Residual Chlorine (TRC) (mg/L)		Report	0.05
Total Suspended Solids (TSS) (mg/L)		30.0	60.0
Oil and Grease (mg/L)		15.0	30.0
Dissolved Iron (mg/L)			7.0
Benzene (mg/L)			0.0025
BTEX (mg/L)			0.25
Total PCBs (µg/L)		Report	Report

Water Quality-Based Limitations

A water quality analysis was not performed to calculate water quality based effluent limitations as the discharge water is hydrostatic test water.

Anti-Backsliding

The limitations in the site's current permit can be used pursuant to EPA's anti-backsliding regulation, 40 CFR 122.44(l) and are displayed in Table 5 below.

Table 5: Current Limitations at IMP 101

Parameter	Effluent Limitations			Monitoring Requirements	
	Minimum	Average Monthly	Instantaneous Maximum	Minimum Measurement Frequency (1),(2)	Sample Type
Flow (GPM) (3)	XXX	Report	XXX	1/discharge	Measured
Duration of Discharge (Hours) (3)	XXX	Report	XXX	1/discharge	Measured
Total Volume Discharged (Gallons) (3)	XXX	Report Total Monthly	XXX	1/month	Calculated
Dissolved Oxygen (mg/L)	5.0	XXX	XXX	2/discharge	Grab
pH (S.U.)	6.0	XXX	9.0	2/discharge	Grab
Total Residual Chlorine (TRC) (mg/L) (4)	XXX	Report	0.05	2/discharge	Grab

Total Suspended Solids (TSS) (mg/L)	XXX	30	60	1/discharge	Grab
Oil and Grease (mg/L)	XXX	15	30	1/discharge	Grab
Dissolved Iron (mg/L)	XXX	XXX	7.0	1/discharge	Grab
Benzene (mg/L) (5)	XXX	XXX	0.0025	1/discharge	Grab
BTEX (mg/L) (5), (6)	XXX	XXX	0.25	1/discharge	Grab
Total PCBs (µg/L) (7)	XXX	Report	Report	1/discharge	Grab

.

Proposed Effluent Limitations and Monitoring Requirements

The proposed effluent monitoring requirements for IMP 101 are displayed in Table 6 below, they are the most stringent values from the above effluent limitation development.

Table 6: Current Limitations at IMP 101

Parameter	Effluent Limitations			Monitoring Requirements	
	Instant. Minimum	Average Monthly	Instantaneous Maximum	Minimum Measurement Frequency (1),(2)	Sample Type
Flow (GPM) (3)	XXX	Report	XXX	1/discharge	Measured
Duration of Discharge (Hours) (3)	XXX	Report	XXX	1/discharge	Measured
Total Volume Discharged (Gallons) (3)	XXX	Report Total Monthly	XXX	1/month	Calculated
Dissolved Oxygen (mg/L)	5.0	XXX	XXX	2/discharge	Grab
pH (S.U.)	6.0	XXX	9.0	2/discharge	Grab
Total Residual Chlorine (TRC) (mg/L) (4)	XXX	Report	0.05	2/discharge	Grab
Total Suspended Solids (TSS) (mg/L)	XXX	30	60	1/discharge	Grab
Oil and Grease (mg/L)	XXX	15	30	1/discharge	Grab
Dissolved Iron (mg/L)	XXX	XXX	7.0	1/discharge	Grab
Benzene (mg/L) (5)	XXX	XXX	0.0025	1/discharge	Grab
BTEX (mg/L) (5), (6)	XXX	XXX	0.25	1/discharge	Grab
Total PCBs (µg/L) (7)	XXX	Report	Report	1/discharge	Grab

Footnotes

(1) This is the minimum number of sampling events required. Permittees are encouraged, and it may be advantageous in demonstrating compliance, to perform more than the minimum number of sampling events.

(2) The permittee shall collect samples at the point of discharge (outfall) prior to the discharge entering the receiving waters. For measurement frequencies of 1/discharge, the permittee shall collect samples within the first 30 minutes of commencing a discharge. For measurement frequencies of 2/discharge, the permittee shall collect one sample at the start of a discharge and one sample at the end of a discharge.

(3) The permittee shall report the average monthly flow, in gallons per minute (GPM), for all discharges occurring during the month. The permittee shall measure the flow and the duration of the discharge (in hours) for each discharge and shall report this information to DEP in the Annual Report as specified in Part A III of this permit. The permittee shall report the total volume discharged each month, in gallons.

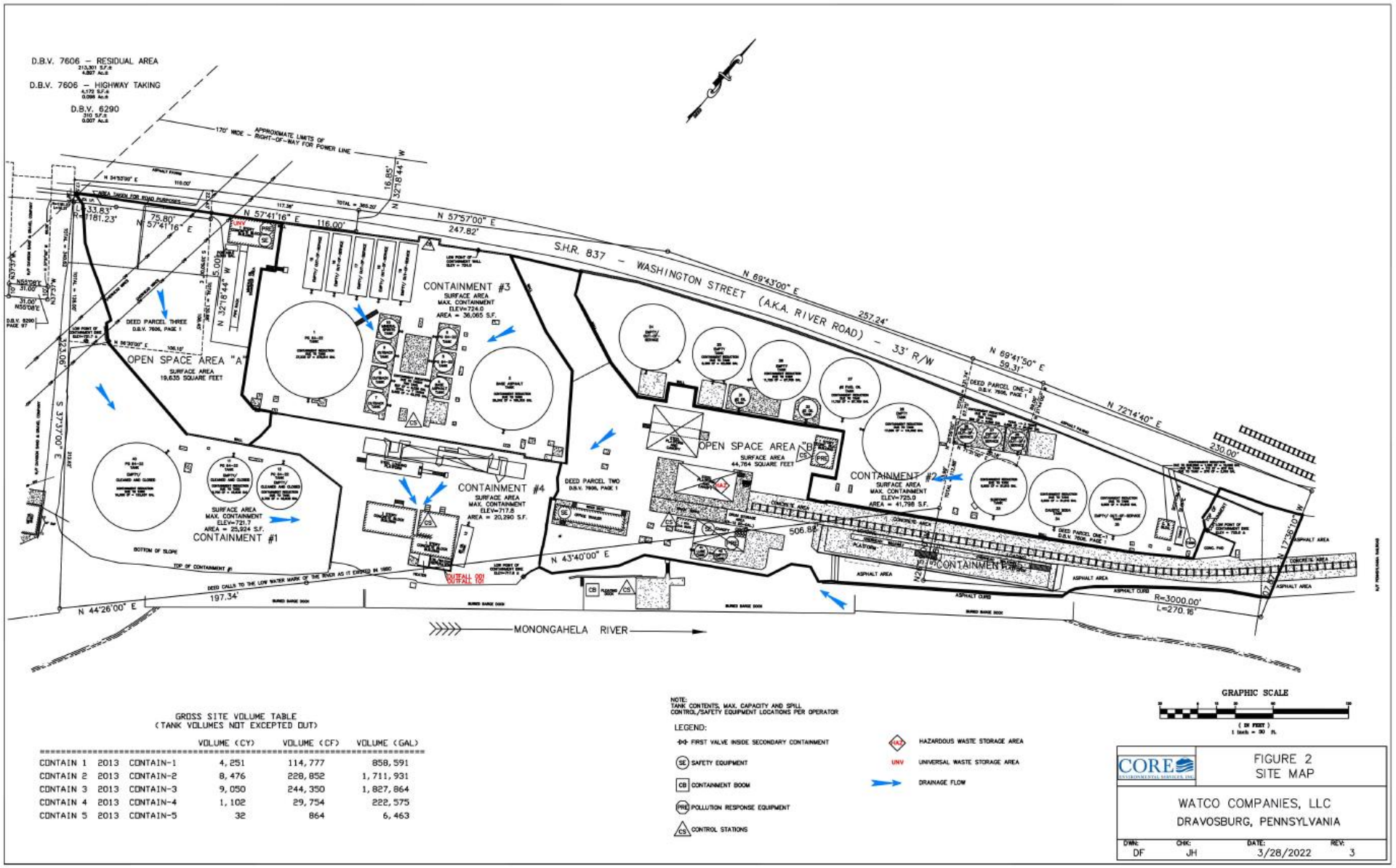
(4) The permittee shall comply with effluent limitations and monitoring requirements for Total Residual Chlorine (TRC) when a public water supply or other source of chlorinated water is used in hydrostatic testing.

(5) The permittee shall comply with effluent limitations and monitoring requirements for Benzene and BTEX for existing natural gas transmission lines (NGTLs), existing petroleum storage tanks (PSTs) and existing petroleum transmission lines (PTLs).

(6) The permittee shall calculate Total BTEX as the sum of concentrations for Benzene, Toluene, Ethylbenzene, and Total Xylenes determined through analysis of the same sample.

(7) Monitoring for Total PCBs is required only for existing Natural Gas Transmission Lines (NGTLs).

Tools and References Used to Develop Permit	
☐	WQM for Windows Model (see Attachment)
☐	Toxics Management Spreadsheet (see Attachment)
☐	TRC Model Spreadsheet (see Attachment)
☐	Temperature Model 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:



GROSS SITE VOLUME TABLE
(TANK VOLUMES NOT EXCEPTED OUT)

			VOLUME (CY)	VOLUME (CF)	VOLUME (GAL)
CONTAIN 1	2013	CONTAIN-1	4,251	114,777	858,591
CONTAIN 2	2013	CONTAIN-2	8,476	228,852	1,711,931
CONTAIN 3	2013	CONTAIN-3	9,050	244,350	1,827,864
CONTAIN 4	2013	CONTAIN-4	1,102	29,754	222,575
CONTAIN 5	2013	CONTAIN-5	32	864	6,463

NOTE:
TANK CONTENTS, MAX. CAPACITY AND SPILL CONTROL/SAFETY EQUIPMENT LOCATIONS PER OPERATOR

LEGEND:

- FIRST VALVE INSIDE SECONDARY CONTAINMENT
- SE SAFETY EQUIPMENT
- CB CONTAINMENT BOOM
- PRE POLLUTION RESPONSE EQUIPMENT
- CS CONTROL STATIONS
- HAZ HAZARDOUS WASTE STORAGE AREA
- UNV UNIVERSAL WASTE STORAGE AREA
- DRAINAGE FLOW

GRAPHIC SCALE
(IN FEET)
1 inch = 50 ft.

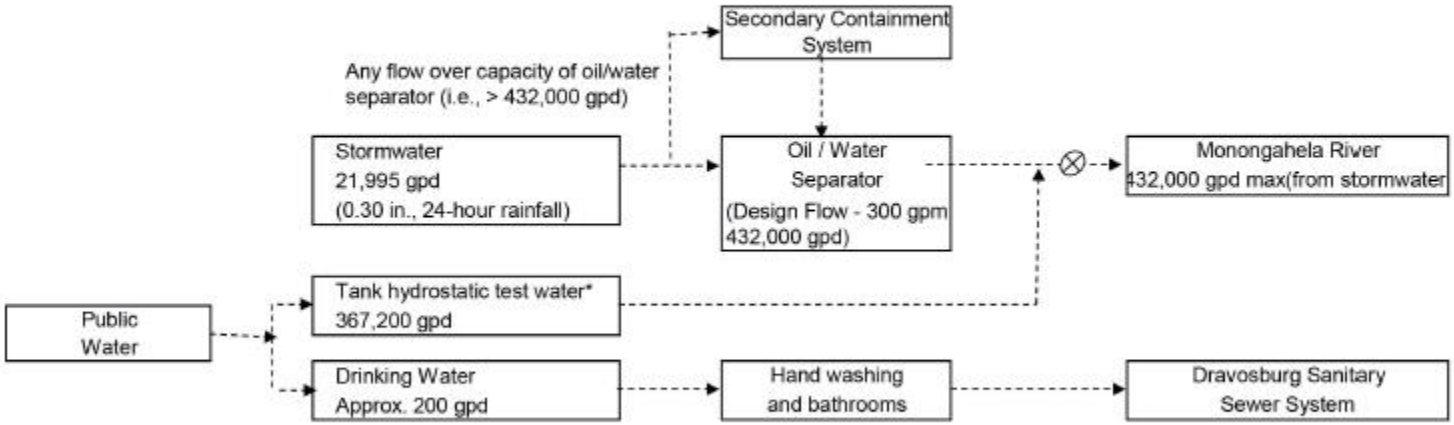
CORE ENVIRONMENTAL SERVICES, INC.

FIGURE 2
SITE MAP

WATCO COMPANIES, LLC
DRAVOSBURG, PENNSYLVANIA

DWN:	CHK:	DATE:	REV:
DF	JH	3/28/2022	3

LINE DRAWING
WTPS DRAVOSBURG TERMINAL
DRAVOSBURG, PA



* Tank hydrostatic test water discharge occurs only every few years. Flow based on 2008 test. 2005 flow was 330 gpm or approximately 480,000 gpd.

⊗ = Point where sample is taken.