pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Northcentral Regional Office
CLEAN WATER PROGRAM

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

Application Type	**Amendment, Major**	Application No.	**PA0232874**
Facility Type	**Storm Water**	APS ID	**1010404**
Major / Minor	**Minor**	Authorization ID	**1303699**

Applicant and Facility Information

Applicant Name	**American Rock Salt Company, LLC**	Facility Name	**DuBois Salt Storage Facility**
Applicant Address	PO Box 190	Facility Address	Twp Road #372
	Mount Morris, NY 14510-0190		DuBois, PA 15801
Applicant Contact	Sharon Hinkson	Facility Contact	Chip Pascuzzo
Applicant Phone	(585) 991-6815	Facility Phone	(585) 746-6700
Client ID	112334	Site ID	536525
SIC Code	5169	Municipality	Sandy Township
SIC Description	Wholesale Trade - Chemicals And Allied Products, NEC	County	Clearfield
Date Application Received	January 30, 2020	EPA Waived?	Yes
Date Application Accepted	February 10, 2020	If No, Reason	
Purpose of Application	Change discharge location and revise the site-specific Best Management Practices (BMPs).		

Amendment Request Overview

American Rock Salt Company ("ARSC") has submitted an application to DEP requesting several changes to the existing permit, including; changing the location of discharge point Outfall 001, eliminate existing Internal Monitoring Points (IMPs) 101 and 201. and revising several BMPs located in Part C.II.E.

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
X		*Derek S. Garner* Derek S. Garner / Project Manager	9/28/2020
X		*Nicholas W. Hartranft* Nicholas W. Hartranft, P.E. / Environmental Engineer Manager	9/29/2020

Facility Summary

The following facility description is taken from the facility's PPC Plan, developed August 18, 2019:

This salt storage and distribution facility is located one-quarter mile east of Route 255 of Platt Road, approximately one-half mile east of DuBois, Pennsylvania. Salt is delivered to the site by truck and rail from the Hampton Corners Mine in New York. The salt is unloaded from trucks directly on the pad and from the rail cars through a hopper under the railroad tracks on to a conveyor belt constructed in a sealed under track concrete pit. Once the pile is established, a waterproof tarp is used to shield the salt pile from the elements. The salt is loaded onto trucks by front end loaders for highway de-icing. The site features a sealed asphalt pad storage pile of approximately 2.25 acres. The pad is bounded by a continuous 6" curb. On the outside of the curbing there is an eight foot asphalt apron. The stormwater holding pond has a 248,725-gallon capacity. It is lined with a 30 mil PVC liner to inhibit groundwater contamination. Stormwater from the pond is discharged to the Un-named tributary of the Sandy Lick Creek and regulated by the NPDES Permit.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	001	Design Flow (MGD)	n/a
Latitude	41º 7' 30.64"	Longitude	-78º 42' 29.82"
Quad Name	Sabula	Quad Code	0916
Wastewater Description:	Stormwater		
Receiving Waters	Sandy Lick Creek	Stream Code	48527
NHD Com ID	123863087	RMI	Unavailable (1)
Drainage Area	n/a	Yield (cfs/mi^2)	n/a
Q_{7-10} Flow (cfs)	n/a	Q_{7-10} Basis	n/a
Elevation (ft)	n/a	Slope (ft/ft)	n/a
Watershed No.	17-C	Chapter 93 Class.	TSF
Existing Use	n/a	Existing Use Qualifier	n/a
Exceptions to Use	n/a	Exceptions to Criteria	n/a
Assessment Status	Not Assessed (1)		
Cause(s) of Impairment	n/a		
Source(s) of Impairment	n/a		
TMDL Status	Final, 06/09/2009	Name	Redbank Creek TMDL (2)

(1) On August 27, 2020 DEP evaluated site conditions at the ARS facility to determine if a biological survey was possible at the existing and proposed locations of Outfall 001. The evaluation is detailed in a memo dated September 4, 2020 (attached). As part of the site evaluation, the memo states that Sandy Lick Creek splits into two branches approximately 1,300 feet upstream of the facility near the I-80 bridge. The western branch appears to be natural and the east channel (location of the proposed outfall) appears to be channelized and straightened, following the railroad tracks. Since the creek is split into two segments, there is no way to designate an RMI for the channelized branch.

Additionally, an assessment status cannot be designated for the channelized section of Sandy Lick Creek. The memo concludes that, "Sandy Lick Creek in the vicinity of the ARS facility is essentially a large swamp with channels that have been excavated along the railroad tracks. The floodplain of the stream and associated wetlands are extensive, and the low gradient condition and ponding make it impossible to conduct a cause and effect survey or assessment using Department methods."

(2) Sandy Lick Creek is included in the Redbank Creek's watershed TMDL. No specific loads or wasteloads are assigned to this discharge.

Compliance History

The following resolved violations occurred during the existing permit's term:

Violation ID	Violation Date	Violation Type	Violation Type Description	Resolved Date	Inspection ID	Inspected Date
854287	5/24/2019	92A.46	NPDES - Violation of Part C permit condition(s)	7/1/2019	2893546	5/24/2019
871652	8/5/2019	92A.46	NPDES - Violation of Part C permit condition(s)	12/23/2019	2922438	8/5/2019
888680	7/9/2020	92A.41(A)5	NPDES - Failure to properly operate and maintain all facilities which are installed or used by the permittee to achieve compliance	7/14/2020	3054460	7/9/2020

There are no open violations associated with the permittee.

Amendment Proposals

1. **Request:** The current permit requires ARSC to sample an internal monitoring point on the influent of the containment pond. ARSC will obtain a GP-4 (Intake & Outfall Structures) that will allow it to construct a discrete outfall from the outlet side of the containment pond directly to the Sandy Lick Creek. ARSC believes that this proposed discharge point is better suited since there is actual flow in the Sandy Lick Creek, instead of the generally dry nature of the discharge channel at the current sampling point. ARSC proposes to sample its discharge at the outlet side of the control valve once it is installed rather than the existing location of Outfall 102 currently listed in the permit. With this improvement, ARSC also proposes to install a control calve and inlet box at the outlet side of the impoundment so that it can control the flow of stormwater from the facility.

   In addition, ARSC is requesting the Department to remove all internal monitoring points, specifically Outfalls 101 and 102. ARSC believes that it is only required to demonstrate compliance at the final outfall to surface waters.

   Response: In response to this request, DEP conducted a site evaluation on August 27, 2020. As stated in Footnote 1 on page 2 of this Fact Sheet, the site evaluation found that Sandy Lick Creek splits into two branches approximately 1,300 feet upstream of the facility near the I-80 bridge. The western branch (Channel A) appears to be natural and the east channel (Channel B; location of the proposed outfall) appears to be channelized and straightened, following the railroad tracks. Channel B flows past the ARSC facility and continues for approximately 1,900 ft from the proposed discharge where it then loses its channel definition and merges into a wetland (Wetland B) that is hydraulically connected to the existing discharge's wetland (Wetland A). Since Channel A and Channel B of Sandy Lick Creek and Wetland A and Wetland B all appear to be hydraulically connected in a relatively small area, DEP does not believe that the proposed outfall relocation will result in any further negative impacts to Sandy Lick Creek or the associated wetlands. Accordingly, DEP recommends that the request to relocate Outfall 001 is approved. The outfall location in the permit will be adjusted accordingly.

   The second part of the request asks for removal of Internal Monitoring Points 101 and 102 from the permit. Since a control valve will be installed on the existing containment pond, DEP agrees that internal monitoring points are no longer necessary to demonstrate compliance. The stormwater sampling should be completed at the new control valve.

   There are no proposed changes to the industrial activity taking place at the site. Accordingly, DEP recommends that the existing stormwater monitoring requirements at Internal Monitoring Points 101 and 102 be transferred to Outfall 001.

2. **Request:** In the current permit, Section II.E.1.b states the following:

   All stockpiles must be covered to prevent precipitation contact except when receiving salt, building the stockpile, or loading out to customers. To minimize contact with precipitation, the stockpile must be covered in sections or stages as salt is added to the stockpile. No section of the pile shall remain uncovered for greater than 15 days.

   ARSC proposes the following revisions to the permit language:

   All stockpiles must be covered to prevent precipitation contact except when receiving salt, building the stockpile, or loading out to customers. To minimize contact with precipitation, the stockpile must be covered in sections or stages as salt is added to the stockpile. ***The pile shall be covered as soon as practicable.*** ~~*No section of the pile shall remain uncovered for greater than 15 days.*~~

   Response: DEP has reviewed ARSC's justification for the above request, which includes citing BMPs identified in the Reading, PA facility's NPDES Permit No. PA0266477. It appears that the BMP pertaining to covering the stockpile was mainly taken from Appendix K of the PAG-03, *"If stockpiles are not covered under permanent, structural cover, stockpiles must be covered by materials including but not limited to tarpaulin, polyethylene, polyurethane, polypropylene or hypalon with sufficient strength to prevent tearing. When loading and unloading is not being done, the entire stockpile must be covered at all times."*

   It appears that the language in the Reading facility's permit and Appendix K do not allow for a 15-day period, as is currently in the DuBois' facility permit. DEP NCRO believes the 15-day period is an appropriate middle-ground between "*…the entire stockpile must be covered at all times,"* and ARSC's proposed language of "…*as soon as practicable."* The 15-day period should allow for some operational flexibility without leaving the condition open-ended.

3. **Request:** In the current permit, Section II.E.2.d. states the following:

   Maintain adequate cover at the lower edge or toe of the working face to permit maximum possible resealing of the edge of the cover when operations are completed for the day. Take care to avoid cover damage caused by cascading salt from the upper section of the working face.

   ARSC proposes the following revisions to the permit language:

   Maintain adequate cover ~~at the lower edge or toe of the working face~~ to permit maximum possible resealing of the edge of the cover when operations are completed for the day. Take care to avoid cover damage caused by cascading salt from the upper section of the working face.

   Response: ARSC's justification for this request was provided mainly through citing safety concerns and OSHA and MHSA regulations. DEP believes ARSC's proposed revision is appropriate. The condition will be modified accordingly.

Existing Effluent Limitations and Monitoring Requirements

The existing monitoring requirements are as follows:

Outfall 001, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Rainfall (In)	Report	Report	XXX	XXX	XXX	XXX	See Permit[A]	See Permit[A]
Total Flow (Total Volume, Mgal) (M Gal)	Report	Report	XXX	XXX	XXX	XXX	See Permit[B]	Calculation

Outfall 101, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Daily Maximum	Maximum	Instant. Maximum		
pH (S.U.) Internal Monitoring Point	XXX	XXX	Report Inst Min	Report	XXX	XXX	1/quarter	Grab
Total Suspended Solids Internal Monitoring Point	XXX	XXX	XXX	Report	XXX	XXX	1/quarter	Grab
Total Dissolved Solids Internal Monitoring Point	XXX	XXX	XXX	Report	XXX	XXX	1/quarter	Grab
Cyanide, Free (µg/L) Internal Monitoring Point	XXX	XXX	XXX	Report	XXX	XXX	1/quarter	Grab
Chloride Internal Monitoring Point	XXX	XXX	XXX	Report	XXX	XXX	1/quarter	Grab

Outfall 102, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Daily Maximum	Maximum	Instant. Maximum		
pH (S.U.) Internal Monitoring Point	XXX	XXX	Report Inst Min	Report	XXX	XXX	1/month	Grab
Total Suspended Solids Internal Monitoring Point	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab
Total Dissolved Solids Internal Monitoring Point	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab
Cyanide, Free (µg/L) Internal Monitoring Point	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab
Chloride Internal Monitoring Point	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab

Proposed Effluent Limitations and Monitoring Requirements

The monitoring requirements specified below are proposed for the draft permit. 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)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Instant. Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Total Flow (Total Volume, Mgal)	Report	Report	XXX	XXX	XXX	XXX	See Permit	Calculation
pH (S.U.)	XXX	XXX	Report	Report	XXX	XXX	1/month	Grab
Rainfall (In)	Report	Report	XXX	XXX	XXX	XXX	See Permit	See Permit
Cyanide, Free (ug/L)	XXX	XXX	XXX	XXX	Report	XXX	1/month	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/month	Grab
Total Dissolved Solids	XXX	XXX	XXX	XXX	Report	XXX	1/month	Grab
Chloride	XXX	XXX	XXX	XXX	Report	XXX	1/month	Grab

Compliance Sampling Location: Outfall 001

Sandy Lick Creek
Evaluation