pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Northcentral Regional Office
CLEAN WATER PROGRAM

Application Type	**Amendment, Major**	Application No.	**PA0232874 A-1**
Facility Type	**Storm Water**	APS ID	**1036234**
Major / Minor	**Minor**	Authorization ID	**1349648**

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

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	April 13, 2021	EPA Waived?	Yes
Date Application Accepted	April 20, 2021	If No, Reason	

Purpose of Application: Remove internal sampling points and revise the site-specific best management practices (BMPs).

Amendment Request Overview

American Rock Salt Company, LLC ("ARSC") has submitted an application to DEP requesting several changes to the existing permit, including removing sampling requirements from existing IMP 101 and revising several BMPs located in Part C II.E. of the permit.

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	October 29, 2021
X		*Nicholas W. Hartranft* Nicholas W. Hartranft, P.E. / Environmental Engineer Manager	November 5, 2021

Treatment 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.

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 (IMP 101) on the influent to the containment pond. ARSC is requesting the Department to remove IMP 101. In addition, ARSC will keep the discharge pipe in its current location, which discharged to the Unnamed Tributary of Sandy Lick Creek.

   Response: IMPs 101 and 102 were established to capture first flush (IMP 101) and average discharged waters (IMP 102). It is DEP's understanding that a control valve is installed in the existing containment pond, making sampling from both IMPs 101 and 102 redundant. DEP agrees that IMP 101's sampling requirements can be removed from the permit and that sampling at IMP 102 should remain.

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 the 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 has had follow-up correspondence with the Department on October 21, 2020, and again on June 14, 2021, and based on its understanding of the Department's explanation, believes that the condition, with the proposed revisions below, will allow it to operate with the required flexibility.

   Proposed Revised Permit Language:

   (Note: Bold text indicates a proposed addition.)

   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 the 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. ***If salt is being loaded or unloaded, the pile section can be uncovered, but in no circumstances can it be left uncovered for greater than 15 days if loading/unloading (i.e., the pile is static) is not occurring.***

ARSC's understanding of the Department's explanation is that as long as ARSC is receiving salt, building the stockpile, or loading out to customers, the pile can remain uncovered. The 15-day clock only starts when the pile is "static."

Response: DEP agrees that the proposed language is helpful in providing additional clarification. The condition will be modified accordingly.

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.

Justification for the request: Based on ARSC's operation of other stockpiles throughout Pennsylvania and in other locations, it believes that resealing the edge of the cover when operations are completed for the day creates substantial safety concerns. ARSC was issued a final NPDES permit for its Reading stockpile (Permit No. PA0266477) in October 2019 with language that is similar to what ARSC is requesting with this application. ARSC believes that consistent permitting through the Commonwealth of Pennsylvania will not only ensure consistent compliance but will enhance environmental and business outcomes.

There are several safety regulations, including General Industry: OSHA 29 CFR 1910.176, Construction: OSHA 29 CFR 1926.250, and Mining: MHSA 30 CFR 56.16001 that apply to ARSC's operation. These regulations generally prohibit field personnel from climbing on salt piles near or in close proximity to a working face. ARSC believes that following the Best Management Practices (BMPs) and implementing the stormwater controls in the "Salt Institute Voluntary Salt Storage Guidelines" is protective of the environment and also eliminates ARSC from compromising the safety of its employees.

The stability of a stockpile slope can quickly change and is unpredictable. Fluctuations in the weather (changes in moisture, freezing and thawing, etc.) can also contribute to slope instability. The slope could collapse, or large chunks of material could fall or slide off the pile. Falling material can severely injure or kill an operator. Due to these and other potential safety issues with climbing on piles, ARSC only contracts with trained and dedicated personnel to install the tarping system.

The tarping system is designed to allow ARSC personnel to safely remove portions of the cover to allow access to the salt, but once the portion is removed, it cannot safely be re-installed. The Salt Institute's "Salt Storage Handbook" specifically indicates loading or unloading from underneath a tarp is "very dangerous and should not be attempted," so ARSC cannot simply leave the cover in place. The BMPs implemented ensure that the minimum amount of working face is exposed at any one time.

Therefore, ARSC respectfully requests the Department to revise the language in the permit so that ARSC can comply.

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

IMP 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

IMP 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
	Total Monthly	Daily Maximum	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Total Flow (Total Volume, Mgal) (M Gal)	Report	Report	XXX	XXX	XXX	XXX	See Permit	Calculation
Rainfall (In)	Report	Report	XXX	XXX	XXX	XXX	See Permit	See Permit

IMP 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	Instant. Minimum	Daily Maximum	Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	Report	Report	XXX	XXX	1/month	Grab
Total Suspended Solids	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab
Total Dissolved Solids	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab
Cyanide, Free (µg/L)	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab
Chloride	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab