

Application Type Renewal  
Facility Type Storm Water  
Major / Minor Minor

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

Application No. PA0232912  
APS ID 1062552  
Authorization ID 1394959

**Applicant and Facility Information**

Applicant Name	<u>Key Energy Services, LLC</u>	Facility Name	<u>Mill Hall Yard</u>
Applicant Address	<u>1500 Citywest Boulevard Suite 800</u> <u>Houston, TX 77042-2380</u>	Facility Address	<u>28 Karls Lane</u> <u>Mill Hall, PA 17751</u>
Applicant Contact	<u>Jill Best</u>	Facility Contact	<u>Nathan Grimes</u>
Applicant Phone	<u>(713) 651-4442</u>	Facility Phone	<u>(304) 904-3414</u>
Client ID	<u>135643</u>	Site ID	<u>822738</u>
SIC Code	<u>1389</u>	Municipality	<u>Porter Township</u>
SIC Description	<u>Mining - Oil And Gas Field Services, NEC</u>	County	<u>Clinton</u>
Date Application Received	<u>April 29, 2022</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>May 9, 2022</u>	If No, Reason	<u></u>
Purpose of Application	<u>Renewal of an existing NPDES permit for the discharge of industrial stormwater.</u>		

**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 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		<i>Derek S. Garner</i> Derek S. Garner / Project Manager	May 4, 2023
X		<i>Nicholas W. Hartranft</i> Nicholas W. Hartranft, P.E. / Environmental Engineer Manager	May 5, 2023

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

Outfall No.	<u>001</u>	Design Flow (MGD)	<u>n/a - stormwater</u>
Latitude	<u>41° 2' 58.85"</u>	Longitude	<u>-77° 30' 9.47"</u>
Quad Name	<u>Beech Creek</u>	Quad Code	<u>1025</u>
Wastewater Description: <u>Stormwater</u>			

Receiving Waters	<u>Unnamed Tributary of Cedar Run</u>	Stream Code	<u>22449</u>
NHD Com ID	<u>67176676</u>	RMI	<u>0.8</u>
Drainage Area	<u>n/a</u>	Yield (cfs/mi <sup>2</sup> )	<u>n/a</u>
Q <sub>7-10</sub> Flow (cfs)	<u>n/a</u>	Q <sub>7-10</sub> Basis	<u>n/a</u>
Elevation (ft)	<u>n/a</u>	Slope (ft/ft)	<u>n/a</u>
Watershed No.	<u>9-C</u>	Chapter 93 Class.	<u>HQ-CWF, MF</u>
Existing Use	<u>n/a</u>	Existing Use Qualifier	<u>n/a</u>
Exceptions to Use	<u>n/a</u>	Exceptions to Criteria	<u>n/a</u>
Assessment Status	<u>Attaining Use(s)</u>		
Cause(s) of Impairment	<u>n/a</u>		
Source(s) of Impairment	<u>n/a</u>		
TMDL Status	<u>n/a</u>	Name	<u>n/a</u>

Nearest Downstream Public Water Supply Intake	<u>PA American Water Company</u>		
PWS Waters	<u>West Branch Susquehanna River</u>	Flow at Intake (cfs)	<u>741.48</u>
PWS RMI	<u>10.6</u>	Distance from Outfall (mi)	<u>~75 miles</u>

**NPDES Permit Fact Sheet**  
**Mill Hall Yard**

**NPDES Permit No. PA0232912**

Outfall No.	<u>002</u>	Design Flow (MGD)	<u>n/a - stormwater</u>
Latitude	<u>41° 2' 50.61"</u>	Longitude	<u>-77° 30' 1.76"</u>
Quad Name	<u>Beech Creek</u>	Quad Code	<u>1025</u>
Wastewater Description:	<u>Stormwater</u>		

Receiving Waters	<u>Unnamed Tributary of Cedar Run</u>	Stream Code	<u>22449</u>
NHD Com ID	<u>67176676</u>	RMI	<u>0.84</u>
Drainage Area	<u>n/a</u>	Yield (cfs/mi <sup>2</sup> )	<u>n/a</u>
Q <sub>7-10</sub> Flow (cfs)	<u>n/a</u>	Q <sub>7-10</sub> Basis	<u>n/a</u>
Elevation (ft)	<u>n/a</u>	Slope (ft/ft)	<u>n/a</u>
Watershed No.	<u>9-C</u>	Chapter 93 Class.	<u>HQ-CWF, MF</u>
Existing Use	<u>n/a</u>	Existing Use Qualifier	<u>n/a</u>
Exceptions to Use	<u>n/a</u>	Exceptions to Criteria	<u>n/a</u>
Assessment Status	<u>Attaining Use(s)</u>		
Cause(s) of Impairment	<u>n/a</u>		
Source(s) of Impairment	<u>n/a</u>		
TMDL Status	<u>n/a</u>	Name	<u>n/a</u>

Nearest Downstream Public Water Supply Intake	<u>PA American Water Company</u>		
PWS Waters	<u>West Branch Susquehanna River</u>	Flow at Intake (cfs)	<u>741.48</u>
PWS RMI	<u>10.6</u>	Distance from Outfall (mi)	<u>~75 miles</u>

**NPDES Permit Fact Sheet**  
**Mill Hall Yard**

**NPDES Permit No. PA0232912**

Outfall No.	<u>003</u>	Design Flow (MGD)	<u>n/a - stormwater</u>
Latitude	<u>41° 2' 45.53"</u>	Longitude	<u>-77° 30' 8.09"</u>
Quad Name	<u>Beech Creek</u>	Quad Code	<u>1025</u>
Wastewater Description:		<u>Stormwater</u>	

Receiving Waters	<u>Unnamed Tributary of Cedar Run</u>	Stream Code	<u>22449</u>
NHD Com ID	<u>67176676</u>	RMI	<u>0.72</u>
Drainage Area	<u>n/a</u>	Yield (cfs/mi <sup>2</sup> )	<u>n/a</u>
Q <sub>7-10</sub> Flow (cfs)	<u>n/a</u>	Q <sub>7-10</sub> Basis	<u>n/a</u>
Elevation (ft)	<u>n/a</u>	Slope (ft/ft)	<u>n/a</u>
Watershed No.	<u>9-C</u>	Chapter 93 Class.	<u>HQ-CWF, MF</u>
Existing Use	<u>n/a</u>	Existing Use Qualifier	<u>n/a</u>
Exceptions to Use	<u>n/a</u>	Exceptions to Criteria	<u>n/a</u>
Assessment Status	<u>Attaining Use(s)</u>		
Cause(s) of Impairment	<u>n/a</u>		
Source(s) of Impairment	<u>n/a</u>		
TMDL Status	<u>n/a</u>	Name	<u>n/a</u>

Nearest Downstream Public Water Supply Intake	<u>PA American Water Company</u>		
PWS Waters	<u>West Branch Susquehanna River</u>	Flow at Intake (cfs)	<u>741.48</u>
PWS RMI	<u>10.6</u>	Distance from Outfall (mi)	<u>~75 miles</u>

### Facility Summary

Key Energy Services, LLC is an oil and gas service company that owns and operates the Mill Hall Yard; which includes office space, a service garage, and equipment storage. The service garage includes a wash bay which drains to an oil water separator that discharges to the sanitary sewer system. The site surface is generally gravel with vegetation along the perimeter of the property. Storage onsite includes empty frac tank trailers and empty oil tank trucks.

Onsite stormwater runoff is discharged from the site via Outfalls 001, 002, and 003. Outfall 001 is located along the northern edge of the property, Outfall 002 is located on the eastern edge of the property, and Outfall 003 is located along the southern edge of the property. All three outfalls potentially discharge stormwater runoff from gravel parking lots; however, the permittee states no discharge has occurred from Outfalls 002 and 003.

The facility's PPC Plan was most recently updated August 2022.

### Compliance History

Three violations occurred during the existing permit's term:

- 1) Late DMR submission for monitoring period end date June 30, 2021.
- 2) Failure to sample for oil and grease for monitoring period end date June 30, 2022.
- 3) Late DMR submission for monitoring period end date December 31, 2022.

Operations Section is aware of the above noncompliance.

The facility was most recently inspected by DEP on August 31, 2022. All three outfalls were observed, and no impacts were noted.

**Development of Effluent Limitations**

<b>Outfall No.</b> 001	<b>Design Flow (MGD)</b> n/a – stormwater discharge
<b>Latitude</b> 41° 2' 58.85"	<b>Longitude</b> -77° 30' 9.47"
<b>Wastewater Description:</b> Stormwater	

**Technology-Based Limitations**

There are no applicable technology-based effluent limitations for this stormwater discharge.

**Water Quality-Based Limitations**

It is generally not appropriate to assign water quality-based effluent limitations to a discharge of stormwater due to variability in discharge rates and lack of discharge during critical flows. Water quality of stormwater is typically controlled through implementation of best management practices (BMPs). Monitoring requirements are used to indicate if BMP controls are working as expected.

**Best Professional Judgment (BPJ) Limitations**

The existing monitoring requirements are based off the PAG-03 Appendix J requirements for facilities classified under SIC Code 1389. Since issuance of the previous permit, the PAG-03 has been modified and Appendix J now includes several other pollutants. To ensure this permit is at least as stringent as the general permit, DEP proposes the following:

Pollutant	Monitoring Requirements		Benchmark Values
	Minimum Measurement Frequency	Sample Type	
Total Nitrogen (mg/L)	1 / 6 months	Calculation	XXX
Total Phosphorus (mg/L)	1 / 6 months	Grab	XXX
Total Suspended Solids (TSS) (mg/L)	1 / 6 months	Grab	100
Oil and Grease (mg/L)	1 / 6 months	Grab	30
pH (S.U.)	1 / 6 months	Grab	9.0
Chemical Oxygen Demand (COD) (mg/L)	1 / 6 months	Grab	120

**Anti-Backsliding**

No reporting requirements are proposed to be made less stringent than the existing permit.

Outfall No. 002  
 Latitude 41° 2' 50.61"  
 Wastewater Description: Stormwater

Design Flow (MGD) n/a  
 Longitude -77° 30' 1.76"

**Technology-Based Limitations**

There are no applicable technology-based effluent limitations for this stormwater discharge.

**Water Quality-Based Limitations**

It is generally not appropriate to assign water quality-based effluent limitations to a discharge of stormwater due to variability in discharge rates and lack of discharge during critical flows. Water quality of stormwater is typically controlled through implementation of best management practices (BMPs). Monitoring requirements are used to indicate if BMP controls are working as expected.

**Best Professional Judgment (BPJ) Limitations**

The existing monitoring requirements are based off the PAG-03 Appendix J requirements for facilities classified under SIC Code 1389. Since issuance of the previous permit, the PAG-03 has been modified and Appendix J now includes several other pollutants. To ensure this permit is at least as stringent as the general permit, DEP proposes the following:

Pollutant	Monitoring Requirements		Benchmark Values
	Minimum Measurement Frequency	Sample Type	
Total Nitrogen (mg/L)	1 / 6 months	Calculation	XXX
Total Phosphorus (mg/L)	1 / 6 months	Grab	XXX
Total Suspended Solids (TSS) (mg/L)	1 / 6 months	Grab	100
Oil and Grease (mg/L)	1 / 6 months	Grab	30
pH (S.U.)	1 / 6 months	Grab	9.0
Chemical Oxygen Demand (COD) (mg/L)	1 / 6 months	Grab	120

**Anti-Backsliding**

No reporting requirements are proposed to be made less stringent than the existing permit.

Outfall No. 003  
 Latitude 41° 2' 45.53"  
 Wastewater Description: Stormwater

Design Flow (MGD) n/a  
 Longitude -77° 30' 8.09"

**Technology-Based Limitations**

There are no applicable technology-based effluent limitations for this stormwater discharge.

**Water Quality-Based Limitations**

It is generally not appropriate to assign water quality-based effluent limitations to a discharge of stormwater due to variability in discharge rates and lack of discharge during critical flows. Water quality of stormwater is typically controlled through implementation of best management practices (BMPs). Monitoring requirements are used to indicate if BMP controls are working as expected.

**Best Professional Judgment (BPJ) Limitations**

The existing monitoring requirements are based off the PAG-03 Appendix J requirements for facilities classified under SIC Code 1389. Since issuance of the previous permit, the PAG-03 has been modified and Appendix J now includes several other pollutants. To ensure this permit is at least as stringent as the general permit, DEP proposes the following:

Pollutant	Monitoring Requirements		Benchmark Values
	Minimum Measurement Frequency	Sample Type	
Total Nitrogen (mg/L)	1 / 6 months	Calculation	XXX
Total Phosphorus (mg/L)	1 / 6 months	Grab	XXX
Total Suspended Solids (TSS) (mg/L)	1 / 6 months	Grab	100
Oil and Grease (mg/L)	1 / 6 months	Grab	30
pH (S.U.)	1 / 6 months	Grab	9.0
Chemical Oxygen Demand (COD) (mg/L)	1 / 6 months	Grab	120

**Anti-Backsliding**

No reporting requirements are proposed to be made less stringent than the existing permit.



**Existing Effluent Limitations and Monitoring Requirements**

The existing effluent limitations and 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		
Total Suspended Solids	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

**Outfall 002, 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		
Total Suspended Solids	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

**Outfall 003, 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		
Total Suspended Solids	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

**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)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Compliance Sampling Location: Outfall 001

Outfall 002, 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		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Compliance Sampling Location: Outfall 002

Outfall 003, 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		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Compliance Sampling Location: Outfall 003