pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Northcentral Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0233587**
Facility Type	**Industrial**	APS ID	**1007856**
Major / Minor	**Minor**	Authorization ID	**1299129**

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

Applicant and Facility Information

Applicant Name	**Emporium Hardwoods Operations Co. LLC**	Facility Name	**Emporium Hardwoods Operations Co. LLC**
Applicant Address	15970 Route 120 Emporium, PA 15834-3756	Facility Address	15970 Route 120 Emporium, PA 15834-3756
Applicant Contact	Dennis McKimm	Facility Contact	Dennis McKimm
Applicant Phone	(814) 486-3764	Facility Phone	(814) 486-3764
Client ID	279340	Site ID	261536
SIC Code	2421	Municipality	Shippen Township
SIC Description	Manufacturing - Sawmills And Planing Mills, General	County	Cameron
Date Application Received	December 11, 2019	EPA Waived?	Yes
Date Application Accepted	December 24, 2019	If No, Reason	
Purpose of Application	Renewal of an existing NPDES permit for the discharge of industrial waste and stormwater.		

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		/s/ Derek S. Garner / Project Manager	March 31, 2020
x		/s/ Nicholas W. Hartranft, P.E. / Environmental Engineer Manager	

Discharge, Receiving Waters and Water Supply Information

Outfall No.	**001**	Design Flow (MGD)	n/a
Latitude	41º 29' 58.21"	Longitude	-78º 13' 0.38"
Quad Name	Emporium	Quad Code	0620
Wastewater Description:	Boiler blowdown, stormwater		
Receiving Waters	Driftwood Branch Sinnemahoning Creek	Stream Code	24963
NHD Com ID	61428318	RMI	18.97
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.	8-A	Chapter 93 Class.	TSF, MF
Existing Use	n/a	Existing Use Qualifier	n/a
Exceptions to Use	n/a	Exceptions to Criteria	n/a
Assessment Status	Attaining Use(s)		
Cause(s) of Impairment	n/a		
Source(s) of Impairment	n/a		
TMDL Status	n/a	Name	n/a

IMP No.	**101**	Design Flow (MGD)	0.0002
Latitude	41º 29' 58.21"	Longitude	-78º 13' 0.38"
Quad Name	Emporium	Quad Code	0620
Wastewater Description:	Boiler blowdown		
Receiving Waters	Driftwood Branch Sinnemahoning Creek	Stream Code	24963
NHD Com ID	61428318	RMI	18.97
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.	8-A	Chapter 93 Class.	TSF, MF
Existing Use	n/a	Existing Use Qualifier	n/a
Exceptions to Use	n/a	Exceptions to Criteria	n/a
Assessment Status	Attaining Use(s)		
Cause(s) of Impairment	n/a		
Source(s) of Impairment	n/a		
TMDL Status	n/a	Name	n/a

Outfall No.	**002**	Design Flow (MGD)	n/a
Latitude	41º 29' 54.51"	Longitude	-78º 12' 49.90"
Quad Name	Emporium	Quad Code	0620
Wastewater Description:	Stormwater		
Receiving Waters	Driftwood Branch Sinnemahoning Creek	Stream Code	24963
NHD Com ID	61428318	RMI	19.14
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.	8-A	Chapter 93 Class.	TSF, MF
Existing Use	n/a	Existing Use Qualifier	n/a
Exceptions to Use	n/a	Exceptions to Criteria	n/a
Assessment Status	Attaining Use(s)		
Cause(s) of Impairment	n/a		
Source(s) of Impairment	n/a		
TMDL Status	n/a	Name	n/a

Facility Summary

Emporium Hardwoods Operations Co. LLC is a lumber manufacturing facility that includes an outdoor lumber yard and covered dry kiln structures. The facility generates a small boiler blowdown waste stream (< 200 GPD) that is discharged directly to an onsite pond via Outfall 001. Outfall 001 also discharges stormwater. The existing NPDES permit established Internal Monitoring Point ("IMP") 101 so that the boiler blowdown could be sampled prior to comingling with stormwater. Outfall 002 discharges stormwater to another pond onsite.

The ponds are located on the permittee's property, adjacent to Driftwood Branch Sinnemahoning Creek. The only way the ponds could discharge to the creek would be during extreme flooding events. For the purpose of the DEP's database, the receiving water will remain as Driftwood Branch Sinnemahoning Creek, but the review will be based on discharging to the ponds.

Compliance History

The facility was last inspected by DEP on August 20, 2019. There were no violations noted during the inspection.

The permittee generally submits complete DMR results on time; with one late submission and one incomplete submission both occurring in 2018.

Development of Effluent Limitations

Outfall No.	**001**	**Design Flow (GPD)**	n/a
Latitude	41º 30' 1.47"	**Longitude**	-78º 12' 58.50"
Wastewater Description:	Boiler blowdown and stormwater		

Technology-Based Limitations

Since Outfall 001 discharges a comingled stream of boiler blowdown and stormwater, it has been proposed to monitor all applicable technology-based effluent limitations at a new internal monitoring point (101). Refer to IMP 101's discussion below for a discussion of TBELs.

Water Quality-Based Limitations

A reasonable potential analysis was not conducted since Outfall 001 is a predominately stormwater discharge. Modeling stormwater discharges is not appropriate due to the extreme fluctuation in flows and the increase in capacity of the receiving surface water at the time of discharge. Water quality criteria is based on standard flows of the river (Q1-10, Q7-

10, Q30-10, harmonic), which most likely do not occur during a storm event. This is especially true in this case, where the effluent cannot reach Driftwood Branch Sinnemahoning Creek unless there is severe flooding.

Best Professional Judgment (BPJ) Limitations

Due to the discharge of stormwater, it is appropriate to assign pollutant monitoring from the applicable appendix of the PAG-03. Since this facility is classified under SIC Code 2491, Appendix D pollutant monitoring (and BMPs) has been proposed. Previous permit renewals also established pollutant monitoring for total kjeldahl nitrogen and total iron and total aluminum since they have historically been detected in the discharge.

A temperature monitoring requirement for the boiler blowdown is not necessary due to the minimal volume of the discharge.

Existing monitoring requirements are set at 1/6 months which is consistent with Appendix D frequencies for stormwater only discharges. DEP recommends that these requirements remain in the permit.

Anti-Backsliding

No requirements are proposed to be made less stringent. Anti-backsliding regulations are not applicable.

IMP No.	**101**	**Design Flow (GPD)**	200
Latitude	41° 30' 1.47"	**Longitude**	78° 12' 58.50"

Wastewater Description: Boiler blowdown

Technology-Based Effluent Limitations (TBELS)

25 Pa. Code Chapter 95 establishes technology-based effluent limitations for pH, Oil and Grease, and Dissolved Iron for all industrial discharges; including boiler blowdown. Since these limits apply only to the boiler blowdown, it is important to monitor the waste stream prior to comingling with stormwater. Consequently, the existing permit established IMP 101.

Parameter	Limit (mg/L)	SBC	Regulation
pH (S.U.)	6.0	Minimum	95.2(1)
	9.0	IMAX	95.2(1)
Oil and Grease (1)	15	Daily Maximum	95.2(2)(ii)
	30	IMAX	95.2(2)(ii)
Dissolved Iron (1)	7.0	IMAX	95.2(4)

(1) Historically, these parameters have not approached Chapter 93 criteria concentrations in the effluent. Since there is no reasonable potential to exceed criteria, DEP does not recommend establishing requirements for these parameters. This recommendation is inline with previous determinations.

Water Quality-Based Limitations

It is not appropriate to established WQBELs at an internal monitoring point.

Outfall No.	**002**	**Design Flow (GPD)**	n/a
Latitude	41º 29' 58.89"	**Longitude**	-78º 12' 49.31"

Wastewater Description: Stormwater

Technology-Based Limitations

There are no applicable TBELs for this stormwater discharge.

Water Quality-Based Limitations

A reasonable potential analysis was not conducted since Outfall 002 is a predominately stormwater discharge. Modeling stormwater discharges is not appropriate due to the extreme fluctuation in flows and the increase in capacity of the receiving surface water at the time of discharge. Water quality criteria is based on standard flows of the river (Q1-10, Q7-

10, Q30-10, harmonic), which most likely do not occur during a storm event. This is especially true in this case, where the effluent cannot reach Driftwood Branch Sinnemahoning Creek unless there is severe flooding.

Best Professional Judgment (BPJ) Limitations

Due to the discharge of stormwater, it is appropriate to assign pollutant monitoring from the applicable appendix of the PAG-03. Since this facility is classified under SIC Code 2491, Appendix D pollutant monitoring (and BMPs) has been proposed. Previous permit renewals also established pollutant monitoring for total kjeldahl nitrogen and total iron and total aluminum since they have historically been detected in the discharge.

A temperature monitoring requirement for the boiler blowdown is not necessary due to the minimal volume of the discharge.

Existing monitoring requirements are set at 1/6 months which is consistent with Appendix D frequencies for stormwater only discharges. DEP recommends that these requirements remain in the permit.

Anti-Backsliding

No requirements are proposed to be made less stringent. Anti-backsliding regulations are not applicable.

Existing Effluent Limitations and Monitoring Requirements

The existing effluent limitations and monitoring requirements are as follows:

Outfall 001 , from 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
TKN	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phenolics	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Compliance Sampling Location: Outfall 001

Outfall 002, from 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		
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
TKN	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phenolics	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Compliance Sampling Location: Outfall 002

IMP 101 , from 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	Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	6.0	XXX	XXX	9.0	1/quarter	Grab

Compliance Sampling Location: IMP 101

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 , from 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
TKN	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phenolics	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Compliance Sampling Location: Outfall 001

Outfall 002, from 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		
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
TKN	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phenolics	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Compliance Sampling Location: Outfall 002

IMP 101 , from 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	Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	6.0	XXX	XXX	9.0	1/quarter	Grab

Compliance Sampling Location: IMP 101