

Application Type Amendment, Major
 Facility Type Storm Water
 Major / Minor Minor

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

Application No. PA0244210 A-1
 APS ID 993369
 Authorization ID 1273444

Applicant and Facility Information

Applicant Name	<u>Crystal Inc.</u>	Facility Name	<u>Crystal Inc. PMC</u>
Applicant Address	<u>601 W 8th Street</u> <u>Lansdale, PA 19446-1809</u>	Facility Address	<u>601 W 8th Street</u> <u>Lansdale, PA 19446-1809</u>
Applicant Contact	<u>Herb Hingley</u>	Facility Contact	<u>Ted Fickert</u>
Applicant Phone	<u>(215) 368-1661</u>	Facility Phone	<u>(215) 368-1661</u>
Client ID	<u>207971</u>	Site ID	<u>489925</u>
SIC Code	<u>2841</u>	Municipality	<u>Lansdale Borough</u>
SIC Description	<u>Manufacturing - Soap And Other Detergents</u>	County	<u>Montgomery</u>
Date Application Received	<u>April 15, 2019</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u></u>	If No, Reason	<u></u>
Purpose of Application	<u>Permit Amendment.</u>		

Summary of Review

Applicant requests an amendment to the existing NPDES permit to discharge stormwater from a facility that manufactures soaps and waxes.

The facility is currently permitted to discharge stormwater through four Outfalls: 001, 002, 003 and 004.

Since late 2013 the facility has plugged Outfall 001 and 002. The stormwater from those outfalls has been captured and treated by the onsite pretreatment facility and discharged to the Borough of Lansdale's sanitary collection system. Stormwater from the remainder of the facility's open and parking areas runs to Outfalls 003 and 004 which is discharged to an UNT to West Branch of Neshaminy Creek.

A "Remedial Action Plan (RAP)" was approved by PADEP in July 2015 to address the oil and grease impacts observed at the site. As part of the RAP, facility started to capture the stormwater from the northeast stormwater pipe and inlets at Final inlet (formerly Outfall 002) and pumped to an oil-water separator (OWS). Water from the OWS is currently transferred into the onsite waste water treatment system and ultimately discharged to the Borough of Lansdale's sanitary collection system.

Facility began monitoring the performance of the OWS on a monthly basis which shows that the effluent from the OWS is in compliance with the current NPDES limits/requirements. With this amendment, permittee requests permission to discharge treated stormwater from the OWS directly to Outfall 004. The OWS operates a typical flow rate of up to 100 GPM during rain events and for up to several hours/days after wards.

Approve	Deny	Signatures	Date
		Sara Reji Abraham, E.I.T. / Project Manager	
		Pravin C. Patel, P.E. / Environmental Engineer Manager	

Summary of Review

The following changes are made to the permit as part of this amendment:

- (i) Outfall 001 is eliminated from the permit; the outfall is capped and abandoned. Stormwater infiltrates to the ground and no offsite discharge from Outfall 001
- (ii) Outfall 002 is eliminated from the permit; the outfall is capped and abandoned. No offsite discharge from Outfall 002.
- (iii) An internal monitoring point IMP 104 is established for the OWS effluent and the treated stormwater from IMP 104 goes to Outfall 004.

The existing effluent limit/monitoring requirements similar to Outfalls 003 and 004 are included for IMP 104 as follows:

Existing Permit Parameters	Permit Limit or Benchmark
CBOD5	monitor
Chemical Oxygen Demand	120 mg/l (benchmark)
Oil and Grease	30 mg/l
PH	monitor
Total Suspended Solids (TSS)	100 mg/l (benchmark)
Total Phosphorus	monitor
Total Kjeldahl Nitrogen (TKN)	monitor
Iron, Total	monitor
Surfactants (MBAS)	monitor
Nitrate-nitrite as N	monitor
Zinc, Total	monitor
Sulfite	monitor

Facility has been using two chemicals, BWT 190M and BWT 269 at the boiler feed water. Steam is used to transfer product to bulk storage tanks, steam condensate discharged to the ground may contain trace amounts of boiler chemicals. Review shows the Chemicals BWT 190M and BWT 269 are not on the approved list. Requested permittee to follow the appropriate procedure to get the Chemical Additives approval.

Requirement regarding Chemical Additives is included in the Part C of the permit.

Nothing else is changed in the permit.

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.

Act 14 Notifications:

Borough of Lansdale - April 5, 2019
Montgomery County - April 8, 2019

Permit Conditions:

- A. Stormwater Outfalls
- B. Best Management Practices
- C. Routine Inspections
- D. PPC Plan
- E. Stormwater Monitoring
- F. Chemical Additives Requirements
- G. Acquire Necessary Property Rights
- H. Proper Sludge Disposal

Discharge, Receiving Waters and Water Supply Information

Outfall No.	<u>003</u>	Design Flow (MGD)	<u>0</u>
Latitude	<u>40° 15' 20.60"</u>	Longitude	<u>-75° 17' 22.65"</u>
Quad Name	<u>Telford</u>	Quad Code	<u>1643</u>
Wastewater Description: <u>Stormwater</u>			
Receiving Waters	<u>Unnamed Tributary to West Branch Neshaminy Creek (WWF, MF)</u>	Stream Code	<u>02889</u>
NHD Com ID	<u>25484806</u>	RMI	<u>1.3</u>
Watershed No.	<u>2-F</u>	Chapter 93 Class.	<u>WWF, MF</u>
Assessment Status	<u>Impaired</u>		
Cause(s) of Impairment	<u>NUTRIENTS</u>		
Source(s) of Impairment	<u>MUNICIPAL POINT SOURCE DISCHARGES</u>		
TMDL Status	<u>Final- Nutrient Part of the TMDL is withdrawn</u>	Name	<u>Neshaminy Creek</u>

Outfall No.	<u>004</u>	Design Flow (MGD)	<u>0</u>
Latitude	<u>40° 15' 20.60"</u>	Longitude	<u>-75° 17' 22.65"</u>
Quad Name	<u>Telford</u>	Quad Code	<u>1643</u>
Wastewater Description: <u>Stormwater</u>			
Receiving Waters	<u>Unnamed Tributary to West Branch Neshaminy Creek (WWF, MF)</u>	Stream Code	<u>02889</u>
NHD Com ID	<u>25484806</u>	RMI	<u>1.3</u>
Watershed No.	<u>2-F</u>	Chapter 93 Class.	<u>WWF, MF</u>
Assessment Status	<u>Impaired</u>		
Cause(s) of Impairment	<u>NUTRIENTS</u>		
Source(s) of Impairment	<u>MUNICIPAL POINT SOURCE DISCHARGES</u>		
TMDL Status	<u>Final-Nutrient Part of the TMDL is withdrawn</u>	Name	<u>Neshaminy Creek</u>

Proposed Effluent Limitations and Monitoring Requirements

Outfall 003, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ 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
CBOD5	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	30	XXX	1/6 months	Grab
Nitrate-Nitrite	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TKN	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Sulfite	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Zinc	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
MBAS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Proposed Effluent Limitations and Monitoring Requirements

Outfall 004, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ 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
CBOD5	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	30	XXX	1/6 months	Grab
Nitrate-Nitrite	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TKN	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Sulfite	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Zinc	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
MBAS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Proposed Effluent Limitations and Monitoring Requirements

IMP 104, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ 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
CBOD5	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	30	XXX	1/6 months	Grab
Nitrate-Nitrite	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TKN	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Sulfite	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Zinc	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
MBAS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab