Pennsylvania Department of Environmental Protection

Southeast Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0244431**
Facility Type	**Industrial**	APS ID	**1109634**
Major / Minor	**Minor**	Authorization ID	**1477169**

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

Applicant and Facility Information

Applicant Name	**Rhoads Industries Inc**	Facility Name	**Former Phila Navy Yard Dry No 3**
Applicant Address	1900 Kitty Hawk Avenue	Facility Address	5195 S 19th Street
	Philadelphia, PA 19112-1806		Philadelphia, PA 19112-1710
Applicant Contact	Kimberly Buchinsky	Facility Contact	Kimberly Buchinsky
Applicant Phone	(267) 728-6544	Facility Phone	(267) 728-6544
Client ID	264233	Site ID	708758
SIC Code	3731	Municipality	Philadelphia City
SIC Description	Manufacturing - Ship Building And Repairing	County	Philadelphia
Date Application Received	February 21, 2024	EPA Waived?	Yes
Date Application Accepted		If No, Reason	

Purpose of Application: Renewal.

Summary of Review

The permittee has submitted a renewal application for their wastewater discharge into Delaware River through multiple outfalls (Outfalls 002, 003, 004, and 011).

The facility is known as former Philadelphia Navy Yard Dry Dock 3 and following activities are taking place at the site: Repair, painting and maintenance of the ships. SIC code is 3731 - Manufacturing – Ship Building and Repairing.

DEP has conducted a site visit on 2/14/2023. No operational violations were observed. An administrative review of the facility's eDMR records was conducted correlated with the inspection. the facility has had multiple repeated effluent non-compliances reported on the facility's DMR.

Based on the application, the Outfall 002, 003 and 004 are strictly stormwater outfalls and Outfall 011 discharges non-contact cooling water, stormwater discharge, river water seepage through the caisson between the dry dock and the Delaware River, water from the Delaware River that comes into the dry dock with the ship.

On 08/19/2024 DEP has received transfer application as noted below:

Approve	Deny	Signatures	Date
X		Begay Omuralieva Begay Omuralieva / Environmental Engineering Specialist	September 20, 2024
X		Pravin Patel Pravin C. Patel, P.E. / Environmental Engineer Manager	09/20/2024

Summary of Review

Dear Sir or Madam:

On July 19, 2024, ownership of the lease for the above-referenced property will transfer from Philadelphia Ship Repair, LLC to B57 Shipyard, LLC, an affiliate of Rhoads Industries, Inc ("Rhoads"). 57 Shipyard, LLC will sublease the above-reference property to Rhoads, who will operate at the lease premises. Due to the transfer of the lease and sublease, Rhoads is submitting the enclosed application to transfer the NPDES Permit No. PA0244431 to Rhoads.

Transfer of the permit will be processed with this renewal.

No changes in quality or quantity of the discharges from the facility on the applications, therefore previously established effluent limits and monitoring requirements are being proposed as listed on pages 9 -14 of this factsheet.
Additional paragraph were added regarding "BMPs for Aqueous Film Forming Foam" in consistent with newly established statewide requirement.

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.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	011	Design Flow (MGD)	.875
Latitude	39Âº 52' 51.45"	Longitude	-75Âº 11' 4.57"
Quad Name		Quad Code	
Wastewater Description:	Wastewater from dry dock pumps consisting river return water, non-contact cooling water and stormwater		
Receiving Waters	Delaware River (WWF, MF)	Stream Code	
NHD Com ID	25615854	RMI	92.8700
Drainage Area	310,000 ft^2	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)		Q_{7-10} Basis	
Elevation (ft)		Slope (ft/ft)	
Watershed No.	3-J	Chapter 93 Class.	WWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	POLYCHLORINATED BIPHENYLS (PCBS),		
Source(s) of Impairment	SOURCE UNKNOWN,		
TMDL Status	Final	Name	Delaware River Estuary PCB TMDLs

Changes Since Last Permit Issuance: none

Discharge, Receiving Waters and Water Supply Information

Outfall No.	002		
Latitude	39Âº 52' 51.45"	Longitude	-75Âº 11' 4.94"
Quad Name		Quad Code	
Wastewater Description:	Stormwater from northern part of the facility		
Receiving Waters	Delaware River (WWF, MF)	Stream Code	0002
NHD Com ID	25615854	RMI	92.8700
Drainage Area		Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)		Q_{7-10} Basis	
Elevation (ft)		Slope (ft/ft)	
Watershed No.	3-J	Chapter 93 Class.	WWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	POLYCHLORINATED BIPHENYLS (PCBS),		
Source(s) of Impairment	SOURCE UNKNOWN		
TMDL Status	Final	Name	Delaware River Estuary PCB TMDLs

Changes Since Last Permit Issuance:

Discharge, Receiving Waters and Water Supply Information

Outfall No.	003		
Latitude	39Âº 52' 51.45"	Longitude	-75Âº 11' 4.68"
Quad Name		Quad Code	
Wastewater Description:	Stormwater from central part of the facility		
Receiving Waters	Delaware River (WWF, MF)	Stream Code	0002
NHD Com ID	25615854	RMI	92.8700
Drainage Area		Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)		Q_{7-10} Basis	
Elevation (ft)		Slope (ft/ft)	
Watershed No.	3-J	Chapter 93 Class.	WWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	POLYCHLORINATED BIPHENYLS (PCBS),		
Source(s) of Impairment	SOURCE UNKNOWN,		
TMDL Status	Final	Name	Delaware River Estuary PCB TMDLs

Background/Ambient Data		Data Source
pH (SU)		
Temperature (°F)		
Hardness (mg/L)		
Other:		

Nearest Downstream Public Water Supply Intake			
PWS Waters		Flow at Intake (cfs)	
PWS RMI		Distance from Outfall (mi)	

Changes Since Last Permit Issuance:

Discharge, Receiving Waters and Water Supply Information

Outfall No.	004		
Latitude	39Âº 52' 51.45"	Longitude	-75Âº 11' 5.41"
Quad Name		Quad Code	
Wastewater Description:	Stormwater from southern part of the facility		
Receiving Waters	Delaware River (WWF, MF)	Stream Code	0002
NHD Com ID	25615854	RMI	92.8600
Drainage Area		Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)		Q_{7-10} Basis	
Elevation (ft)		Slope (ft/ft)	
Watershed No.	3-J	Chapter 93 Class.	WWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	POLYCHLORINATED BIPHENYLS (PCBS		
Source(s) of Impairment	SOURCE UNKNOWN		
TMDL Status	Final	Name	Delaware River Estuary PCB TMDLs

Changes Since Last Permit Issuance:

Compliance History

DMR Data for Outfall 002 (from August 1, 2023 to July 31, 2024)

Parameter	JUL-24	JUN-24	MAY-24	APR-24	MAR-24	FEB-24	JAN-24	DEC-23	NOV-23	OCT-23	SEP-23	AUG-23
TSS (mg/L) Daily Maximum		118						< 2.5				
Oil and Grease (mg/L) Daily Maximum		< 5.0						< 5.0				
TKN (mg/L) Daily Maximum		1.2						< 0.5				
Total Iron (mg/L) Daily Maximum		3.24						< 0.0582				

DMR Data for Outfall 003 (from August 1, 2023 to July 31, 2024)

Parameter	JUL-24	JUN-24	MAY-24	APR-24	MAR-24	FEB-24	JAN-24	DEC-23	NOV-23	OCT-23	SEP-23	AUG-23
TSS (mg/L) Daily Maximum		74.0						19.1				
Oil and Grease (mg/L) Daily Maximum		< 5.0						< 5.0				
TKN (mg/L) Daily Maximum		0.59						< 0.5				
Total Iron (mg/L) Daily Maximum		7.06						0.719				

DMR Data for Outfall 004 (from August 1, 2023 to July 31, 2024)

Parameter	JUL-24	JUN-24	MAY-24	APR-24	MAR-24	FEB-24	JAN-24	DEC-23	NOV-23	OCT-23	SEP-23	AUG-23
TSS (mg/L) Daily Maximum		115						39.2				
Oil and Grease (mg/L) Daily Maximum		< 5.0						< 5.0				
TKN (mg/L) Daily Maximum		11.4						< 0.5				
Total Iron (mg/L) Daily Maximum		6.33						0.525				

DMR Data for Outfall 011 (from August 1, 2023 to July 31, 2024)

Parameter	JUL-24	JUN-24	MAY-24	APR-24	MAR-24	FEB-24	JAN-24	DEC-23	NOV-23	OCT-23	SEP-23	AUG-23

Flow (MGD) Average Monthly	360000	5400000	5400000	5400000	5400000	5400000	5400000	5400000	5400000	5400000	5400000	5400000
Flow (MGD) Daily Maximum	180000	180000	180000	180000	180000	180000	180000	180000	180000	180000	180000	180000
pH (S.U.) Industrial Influent Instantaneous Minimum	7.02	6.88	7.16	6.7	6.92	6.96	6.38	6.98	6.93	7.01	7.21	7.15
pH (S.U.) Instantaneous Minimum	6.89	6.87	6.69	6.68	6.62	6.83	6.34	6.84	6.73	6.69	6.82	6.82
pH (S.U.) Industrial Influent Instantaneous Maximum	7.03	7.34	7.38	7.08	7.27	7.11	7.3	7.9	7.42	7.38	7.46	7.33
pH (S.U.) Instantaneous Maximum	7.04	7.02	6.93	6.8	7.1	7.05	6.95	7.26	7.12	7.16	7.04	7.37
TSS (mg/L) Average Monthly	23.5	19.425	31.4	22.3	15.0	9.85	38.8	33.0	31.2	19.5	29.75	33.2
TSS (mg/L) Effluent Net Average Monthly	17.88	< 3.0	24.0	< 3.0	7.0	< 3.0	27.4	31.75	31.2	19.5	29.75	33.2
TSS (mg/L) Industrial Influent Average Monthly	5.62	116.875	7.38	25.3	9.7	18	11.4	17.7	9.5	20.6	16.7	8.94
TSS (mg/L) Daily Maximum	25	29	34	30	20.0	18	61.0	38.0	41	29	43	38
TSS (mg/L) Effluent Net Daily Maximum	19.2	< 3.0	17.0	< 3.0	7.0	< 3.0	43.0	38.0	41.0	29.0	43.0	38.0
TSS (mg/L) Industrial Influent Daily Maximum	5.8	440	17	67.0	13	43	18	26	14	43	34	15
Oil and Grease (mg/L) Average Monthly	< 5	5.225	< 5	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5	< 5.0	< 5.0	< 5.0
Oil and Grease (mg/L) Effluent Net Average Monthly	< 5.0	0.225	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.00	< 5.0
Oil and Grease (mg/L) Industrial Influent Average Monthly	< 5	< 5	< 5	5.1	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0

Oil and Grease (mg/L) Effluent Net Instantaneous Maximum	< 5.0	< 0.9	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Oil and Grease (mg/L) Industrial Influent Instantaneous Maximum	< 5	< 5	< 5	5.4	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Oil and Grease (mg/L) Instantaneous Maximum	< 5	5.9	< 5	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5	< 5.0	< 5.0	< 5.0
Total Copper (mg/L) Average Monthly	< 0.02	0.1468	0.0428	0.046	0.029	0.027	0.124	0.28	0.14	0.026	0.023	0.025
Total Copper (mg/L) Daily Maximum	< 0.02	0.49	0.062	0.077	0.055	0.04	0.22	0.76	0.38	0.046	0.031	0.043
Total Iron (mg/L) Average Monthly	4.45	6.05	5.62	3.15	2.4	1.8	6.12	5.8	4.6	2.12	4.0	6.2
Total Iron (mg/L) Daily Maximum	4.5	13	6.3	3.7	2.7	3.8	6.5	6.2	5.9	2.5	5.6	7.5
Total Lead (mg/L) Average Monthly	< 0.015	0.0188	< 0.015	< 0.015	< 0.015	< 0.015	< 0.015	< 0.015	< 0.015	< 0.015	< 0.015	< 0.015
Total Lead (mg/L) Daily Maximum	< 0.015	0.03	< 0.015	< 0.015	< 0.015	< 0.015	< 0.015	< 0.015	< 0.015	< 0.015	< 0.015	< 0.015
Total Zinc (mg/L) Average Monthly	0.0255	0.1413	0.080	0.068	0.032	0.047	0.16	0.38	0.18	0.03	0.028	0.024
Total Zinc (mg/L) Daily Maximum	0.031	0.45	0.097	0.1	0.068	0.099	0.23	1.1	0.46	0.03	0.043	0.038
Ethylbenzene (mg/L) Average Monthly	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001
Ethylbenzene (mg/L) Daily Maximum	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001
Total Xylenes (mg/L) Average Monthly	< 0.001	< 0.001	< 5.0	< 0.001	< 0.001	0.00105	< 0.001	1.7	1.3	< 0.001	< 0.001	< 0.001
Total Xylenes (mg/L) Daily Maximum	< 0.001	< 0.001	< 5.0	< 0.001	< 0.001	0.0012	< 0.001	6.9	3.6	< 0.001	< 0.001	< 0.001
PCBs (Dry Weather) (pg/L) Daily Maximum								1900				

Compliance History

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" (386-0400-001), SOPs and/or BPJ.

Outfall 002, 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		
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TKN	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Compliance Sampling Location: storm inlet A6

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" (386-0400-001), SOPs and/or BPJ.

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		
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TKN	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Compliance Sampling Location: storm inlet B47

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" (386-0400-001), SOPs and/or BPJ.

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		
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TKN	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Compliance Sampling Location: storm inlet G1

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" (386-0400-001), SOPs and/or BPJ.

Outfall 011, 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		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	Daily when Discharging	Calculation
pH (S.U.) Industrial Influent	XXX	XXX	Report Inst Min	XXX	XXX	Report	Weekly when Discharging	Grab
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	Weekly when Discharging	Grab
TSS	XXX	XXX	XXX	Report	Report	XXX	Weekly when Discharging	Grab
TSS Effluent Net	XXX	XXX	XXX	100.0	200.0	XXX	Weekly when Discharging	Calculation
TSS Industrial Influent	XXX	XXX	XXX	Report	Report	XXX	Weekly when Discharging	Grab
Oil and Grease Effluent Net	XXX	XXX	XXX	15.0	XXX	30.0	Weekly when Discharging	Calculation
Oil and Grease	XXX	XXX	XXX	Report	XXX	Report	Weekly when Discharging	Grab
Oil and Grease Industrial Influent	XXX	XXX	XXX	Report	XXX	Report	Weekly when Discharging	Grab
Total Copper	XXX	XXX	XXX	Report	Report	XXX	Weekly when Discharging	Grab
Total Iron	XXX	XXX	XXX	Report	Report	XXX	Weekly when Discharging	Grab
Total Lead	XXX	XXX	XXX	Report	Report	XXX	Weekly when Discharging	Grab
Total Zinc	XXX	XXX	XXX	Report	Report	XXX	Weekly when Discharging	Grab
Ethylbenzene	XXX	XXX	XXX	Report	Report	XXX	Weekly when Discharging	Grab

Outfall 011 , Continued (from 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		
Total Xylenes	XXX	XXX	XXX	Report	Report	XXX	Weekly when Discharging	Grab
PCBs (Dry Weather) (pg/L)	XXX	XXX	XXX	Report Daily Max	XXX	XXX	2/year	Grab

Compliance Sampling Location: outfall 011