

Application Type Amendment, Major
 Facility Type Industrial
 Major / Minor Minor

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

Application No. PA0244538 A-1
 APS ID 1081373
 Authorization ID 1427696

Applicant and Facility Information


Applicant Name	<u>Buckman's Inc.</u>	Facility Name	<u>Buckman's Inc.</u>
Applicant Address	<u>105 Airport Road</u> <u>Pottstown, PA 19464-3438</u>	Facility Address	<u>105 Airport Road</u> <u>Pottstown, PA 19464-3438</u>
Applicant Contact	<u>Brian Good</u>	Facility Contact	<u>Brian Good</u>
Applicant Phone	<u>(610) 495-7495</u>	Facility Phone	<u>(610) 495-7495</u>
Client ID	<u>72881</u>	Site ID	<u>614892</u>
SIC Code	<u>2819</u>	Municipality	<u>Limerick Township</u>
SIC Description	<u>Manufacturing - Industrial Inorganic Chemicals, Nec</u>	County	<u>Montgomery</u>
Date Application Received	<u>February 17, 2023</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u></u>	If No, Reason	<u></u>
Purpose of Application	<u>Major amendment to NPDES permit.</u>		

Summary of Review

The PA Department of Environmental Protection (PADEP/Department) received a major NPDES permit amendment application from Liberty Environmental, Inc. (consultant) on February 17, 2023 on behalf of Buckman's Inc. (permittee) for permittee's Airport Road Facility (facility). The facility is in Limerick Township, Montgomery County. This is a minor Industrial Waste facility without ELG (MIIW1). The permit was last renewed on November 12, 2020 for an average annual design flow of 0.012 MGD, with an effective date of December 1, 2020 and expiration date of November 30, 2025. The amendment application is to add a stormwater outfall 006 that receives stormwater runoff from a recently expanded Warehouse D area that includes Warehouse D, gravel parking lot, grass lawns, and new stormwater Basin D, near the southeastern side of the existing facility. The limits for the existing process wastewater outfall 001 and stormwater outfalls (002, 003, and 005) will remain unchanged. Outfall 006 will be added with same stormwater parameters as other stormwater outfalls. The NPDES amendment will provide details on only the parameters that are being changed (outfall 006) due to this expansion, per SOP BPNPSM-PMT-029.

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
√		Reza H. Chowdhury, E.I.T. / Project Manager 	May 10, 2023
X		Pravin Patel Pravin C. Patel, P.E. / Environmental Engineer Manager	05/10/2023

Discharge, Receiving Waters and Water Supply Information

Outfall No.	<u>001</u>	Design Flow (MGD)	<u>0.012</u>
Latitude	<u>40° 14' 5"</u>	Longitude	<u>-75° 33' 8"</u>
Quad Name	<u>Pottstown</u>	Quad Code	<u>1740</u>
Wastewater Description: <u>Effluent</u>			
Receiving Waters	<u>Possum Hollow Run (WWF, MF)</u>	Stream Code	<u>01640</u>
NHD Com ID	<u>25989264</u>	RMI	<u>2.5</u>
Drainage Area	<u>0.24 mi²</u>	Yield (cfs/mi ²)	<u>0.1</u>
Q ₇₋₁₀ Flow (cfs)	<u>0.024</u>	Q ₇₋₁₀ Basis	<u>Previous fact sheet</u>
Elevation (ft)	<u>290</u>	Slope (ft/ft)	<u></u>
Watershed No.	<u>3-D</u>	Chapter 93 Class.	<u>WWF, MF</u>
Existing Use	<u></u>	Existing Use Qualifier	<u></u>
Exceptions to Use	<u></u>	Exceptions to Criteria	<u></u>
Assessment Status	<u>Attaining Use(s)</u>		
Cause(s) of Impairment	<u></u>		
Source(s) of Impairment	<u></u>		
TMDL Status	<u>NONE</u>	Name	<u></u>

Discharge, Receiving Waters and Water Supply Information

Outfall No.	<u>002</u>	Design Flow (MGD)	<u>0</u>
Latitude	<u>40° 14' 6"</u>	Longitude	<u>-75° 33' 10"</u>
Quad Name	<u>Pottstown</u>	Quad Code	<u>1740</u>
Wastewater Description: <u>Stormwater</u>			

Discharge, Receiving Waters and Water Supply Information

Outfall No.	<u>003</u>	Design Flow (MGD)	<u>0</u>
Latitude	<u>40° 14' 14"</u>	Longitude	<u>-75° 33' 6"</u>
Quad Name	<u>Pottstown</u>	Quad Code	<u>1740</u>
Wastewater Description: <u>Stormwater</u>			

Discharge, Receiving Waters and Water Supply Information

Outfall No.	<u>005</u>	Design Flow (MGD)	<u>0</u>
Latitude	<u>40° 14' 11"</u>	Longitude	<u>-75° 33' 11"</u>
Quad Name	<u>Pottstown</u>	Quad Code	<u>1740</u>
Wastewater Description: <u>Stormwater</u>			

Discharge, Receiving Waters and Water Supply Information

Outfall No.	<u>006</u>	Design Flow (MGD)	<u>0</u>
Latitude	<u>40° 14' 15.6"</u>	Longitude	<u>-75° 32' 58.35"</u>
Quad Name	<u>Pottstown</u>	Quad Code	<u>1740</u>
Wastewater Description: <u>Stormwater</u>			

Discussion on new stormwater drainage area

Buckman's recently completed a facility expansion to accommodate the increasing need for indoor storage of retail merchandise (ski apparel and equipment) associated with Buckman's separate retail store business line, as well as an indoor granular water treatment product packaging line, and finished product storage areas. The expansion area extends to the northeast of the original facility boundary on lands owned by Buckman's, and encompasses approximately 8.8 acres. The expansion area includes a new building (Warehouse D), a partial two-story structure that was completed in 2022. Exterior areas within the expansion include a gravel lot surrounding Warehouse D, grass lawns and a new stormwater basin (Basin D). A stormwater outfall (new Outfall 006) is situated along the northern side of the basin and discharges to undeveloped open space owned by Buckman's.

The primary activities that take place at this facility are office operations, ski apparel and equipment storage, ski equipment repairs, sodium hypochlorite manufacturing, and wholesale material storage. Sodium hypochlorite is made at the facility by utilizing a brine solution to generate caustic soda, then using electrolysis to remove hardness from the solution. The facility consists of five buildings: office buildings, Warehouse A, Warehouse B, Warehouse C, and new Warehouse D. Warehouse A houses a bottling operations for line of 2.5- and 5.0-gallon containers. Warehouse A also used to store deicing products, muriatic acid, and diatomaceous earth. Warehouse C contains finished product storage and packaging materials, as well as a process line for filling one-gallon bottles of liquid solidum hypochlorite. Exterior storage of products and materials at the facility consists of loose, empty sodium hypochlorite fluid containers in collection bays segregated by container size along the north northern side of Warehouse A, empty containers on pallets in exterior lot areas, and bagged, sealed granular product packages on pallets to the west and north of Warehouse A.

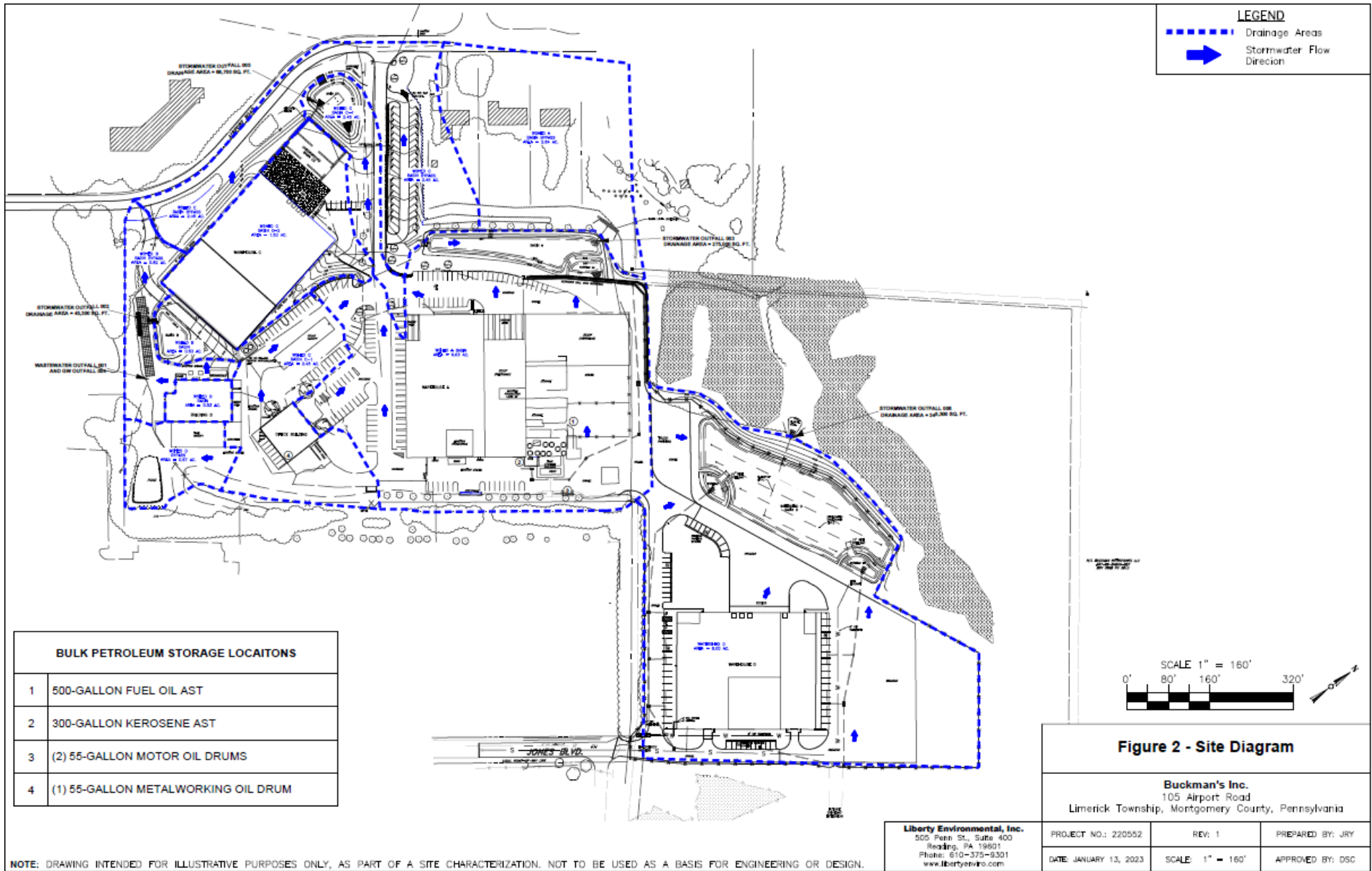
Wastewater generated by the manufacturing process is discharged to the municipal sewer system for treatment at Limerick Township's Possum Hollow STP, unless the pH levels are high, in which case it is transported to Pottstown Borough STP. To remove silica that is present in the facility's raw water supply, a Reverse Osmosis (RO) treatment system is used. The concentrate is discharged to a drainage swale and pond through Outfall 001, located along the southwest side of the facility, which ultimately discharges to Possum Hollow Run. There are three basins on the property that receives stormwater runoff (Outfalls 002, 003, and 005). There is also an existing spring/groundwater discharge through Outfall 004, located adjacent to Outfall 001, which doesn't have monitoring requirements.

The reporting requirements for stormwater only outfalls are per requirements for industrial activities with SIC code 2819 with the applicable PAG03 Appendix F. Current permit has annual monitoring which will be continued. The new Outfall 006 will have same monitoring requirements as other stormwater outfalls. The next page will provide an updated facility map. The integrated contingency plan is updated on January 2023 and submitted with the amendment application.

A stormwater sample was collected for Outfall 006 on November 11, 2022, results of which is provided below:

	Permit Benchmark	Units	November 11, 2022 Sampling Event
NEW EXPANSION OUTFALL (OUTFALL 006)			
Chemical Oxygen Demand	120	mg/L	13.1
Nitrogen, Nitrate-Nitrite	--	mg/L	ND < 0.1
Oil and Grease	--	mg/L	ND < 4.8
Total Phosphorous	--	mg/L	0.11
Total Suspended Solids	100	mg/L	9.6
Total Aluminum	--	mg/L	0.1
Total Iron	--	mg/L	0.125
Total Lead	--	mg/L	ND <0.01
Total Zinc	--	mg/L	ND <0.1
Fecal Coliform	--	cfu/100ml	12

The sample results show that the new Outfall 006 should meet the effluent limits set forth in the permit.



Compliance History

DMR Data for Outfall 001 (from April 1, 2022 to March 31, 2023)

Parameter	MAR-23	FEB-23	JAN-23	DEC-22	NOV-22	OCT-22	SEP-22	AUG-22	JUL-22	JUN-22	MAY-22	APR-22
Flow (MGD) Average Monthly	0.01079 3	0.01010 52	0.00818 6	0.00725 5	0.00682 4	0.00671 2	0.00556 2	0.00573 8	0.00569 2	0.00574 5	0.00676 33	0.00722 46
Flow (MGD) Daily Maximum	0.01345 4	0.01320 7	0.01159 6	0.01206 2	0.01101 7	0.00911 8	0.00840 5	0.00776	0.00771 5	0.00736 5	0.00925	0.00966 2
pH (S.U.) Instantaneous Minimum	7.72	7.68	7.67	7.78	7.78	7.85	7.82	7.77	7.82	7.82	7.76	7.68
pH (S.U.) IMAX	7.85	7.77	7.85	7.86	7.89	7.89	8.08	8.0	7.98	7.89	7.86	7.74
TRC (mg/L) Average Monthly	0.078	0.08	0.0975	0.1	0.076	0.1075	0.1175	0.086	0.0575	0.068	0.08	0.115
TRC (mg/L) IMAX	0.12	0.12	0.014	0.12	0.1	0.14	0.15	0.13	0.07	0.08	0.13	0.14
TSS (mg/L) Average Monthly	< 2.6	< 2.5	< 2.6	< 2.5	< 2.65	< 2.65	< 2.55	< 2.55	< 2.6	< 2.53	< 2.55	< 2.55
TSS (mg/L) Daily Maximum	< 2.7	< 2.5	< 2.6	< 2.5	< 2.8	< 2.7	< 2.6	< 2.6	< 2.6	< 2.6	< 2.6	< 2.6
Total Dissolved Solids (mg/L) Average Monthly	530.0	520.0	470.0	415.0	605.0	640.0	890.0	940.0	1025.0	723.3	555.0	615.0
Total Dissolved Solids (mg/L) Daily Maximum	540.0	590.0	500.0	420.0	640.0	660.0	920.0	940.0	1230.0	850.0	590.0	690.0

DMR Data for Outfall 003 (from April 1, 2022 to March 31, 2023)

Parameter	MAR-23	FEB-23	JAN-23	DEC-22	NOV-22	OCT-22	SEP-22	AUG-22	JUL-22	JUN-22	MAY-22	APR-22
pH (S.U.) Daily Maximum				6.8								
COD (mg/L) Daily Maximum				13.1								
TSS (mg/L) Daily Maximum				14								
Oil and Grease (mg/L) Daily Maximum				< 4.9								
Fecal Coliform (No./100 ml) Daily Maximum				8.0								
Nitrate-Nitrite (mg/L) Daily Maximum				< 0.10								

**NPDES Permit Fact Sheet
Buckman's Inc.**

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Total Phosphorus (mg/L) Daily Maximum				0.14								
Total Aluminum (mg/L) Daily Maximum				< 0.05								
Total Iron (mg/L) Daily Maximum				4.07								
Total Lead (mg/L) Daily Maximum				< 0.01								
Total Zinc (mg/L) Daily Maximum				< 0.1								

DMR Data for Outfall 005 (from April 1, 2022 to March 31, 2023)

Parameter	MAR-23	FEB-23	JAN-23	DEC-22	NOV-22	OCT-22	SEP-22	AUG-22	JUL-22	JUN-22	MAY-22	APR-22
pH (S.U.) Daily Maximum				6.36								
COD (mg/L) Daily Maximum				76.4								
TSS (mg/L) Daily Maximum				70.0								
Oil and Grease (mg/L) Daily Maximum				< 4.8								
Fecal Coliform (No./100 ml) Daily Maximum				612.0								
Nitrate-Nitrite (mg/L) Daily Maximum				0.42								
Total Phosphorus (mg/L) Daily Maximum				0.47								
Total Aluminum (mg/L) Daily Maximum				3.96								
Total Iron (mg/L) Daily Maximum				4.33								
Total Lead (mg/L) Daily Maximum				< 0.02								
Total Zinc (mg/L) Daily Maximum				< 0.2								

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) ⁽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	Continuous	Metered
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/week	Grab
TRC	XXX	XXX	XXX	0.5	XXX	1.2	1/week	Grab
TSS	XXX	XXX	XXX	30.0	60.0	75	2/month	8-Hr Composite
Total Dissolved Solids	XXX	XXX	XXX	2000.0	4000.0	5000	2/month	8-Hr Composite

Compliance Sampling Location: At outfall 001

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 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		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	Upon Request	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	Upon Request	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	Upon Request	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	Upon Request	Grab
Fecal Coliform (No./100 ml)	XXX	XXX	XXX	XXX	Report	XXX	Upon Request	Grab
Nitrate-Nitrite	XXX	XXX	XXX	XXX	Report	XXX	Upon Request	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	Upon Request	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	Upon Request	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	Upon Request	Grab
Total Lead	XXX	XXX	XXX	XXX	Report	XXX	Upon Request	Grab
Total Zinc	XXX	XXX	XXX	XXX	Report	XXX	Upon Request	Grab

Compliance Sampling Location: At Outfall 002

Other Comments:

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 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/year	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Fecal Coliform (No./100 ml)	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Nitrate-Nitrite	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Lead	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Zinc	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab

Compliance Sampling Location: At Outfall 003

*Samples are to be collected in the infiltration basin near the outfall structure.

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 005, 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/year	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Fecal Coliform (No./100 ml)	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Nitrate-Nitrite	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Lead	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Zinc	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab

Compliance Sampling Location: At Outfall 005

Other Comments:

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 006, 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/year	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Fecal Coliform (No./100 ml)	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Nitrate-Nitrite	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Lead	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Zinc	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab

Compliance Sampling Location: at Outfall 006

Other Comments: