pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southeast Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0244881**
Facility Type	**Storm Water**	APS ID	**1049700**
Major / Minor	**Minor**	Authorization ID	**1372889**

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

Applicant and Facility Information

Applicant Name	**Victory Gardens, Inc.**	Facility Name	**Victory Gardens Quakertown Facility**
Applicant Address	357 West Street Road	Facility Address	2150 Rosedale Road
	Warminster, PA 18974		Quakertown, PA 18951
Applicant Contact	Michael Butler	Facility Contact	Michael Butler
Applicant Phone	(215) 603-0500	Facility Phone	(215) 603-0500
Client ID	320829	Site ID	809198
SIC Code	2499	Municipality	Milford Township
SIC Description	Manufacturing - Wood Products, Nec	County	Bucks
Date Application Received	October 13, 2021	EPA Waived?	Yes
Date Application Accepted		If No, Reason	

Purpose of Application: Permit Renewal.

Summary of Review

The applicant has submitted an individual NPDES application for renewal of NPDES Permit to discharge stormwater from the facility into unnamed tributary (UNT) to Unami Creek which is classified as High Quality (HQ) stream. Victory Gardens Quakertown Facility operates a Land Clearing, Grubbing and Excavating (LCGE) plant material mulch processing facility. Originally, applicant submitted PAG-03 for the discharge of stormwater from the facility but did not qualify for General Permit PAG-03 as the discharge is located in the High-Quality stream.

The site is situated on approximately 9.41 acres. The facility receives materials generated from its offsite locations and temporarily stores and processes LCGE wastes, including trees, brush, stumps, and vegetative materials. The site does not process leaves or yard wastes, however the facility may accept clean untreated wood pallets or wood package crates for use as feedstock to blend with the LCGE materials. The wood pallets/crates are only accepted if they are free of glue, resins, additive or paints. Operations at the facility fall under SIC Code 2499: Lumber and Wood Products.

The operations at the facility consist of making of mulch and wood chips from logs, brush, clean wood from clean pallets and other packing crates and wood chip raw material. The wood materials received at the facility come from various Township public works departments, outside tree and general contractor operations, and other land clearing, grubbing and excavating operations. All the raw materials are delivered to the site via trucks and/or trailers. The delivery vehicles are either off-loaded using loaders or dumped directly into the appropriate designated storage areas. Brush, wood chips, logs and other LCGE materials that are received at the site are typically chipped and ground within 7-10 days of arrival on site and will not be stored beyond sixty (60) days guidelines established in the LCGE BMP Manual. The usable raw material is then fed into primary grinder for processing which creates single shredded mulch material or wood chips. The single shredded materials are stored in designated storage areas. The single shredded mulch is eventually sent through finish grinder which grinds into finish product. In addition, the facility dyes some of its finished mulch to meet market demand.

Approve	Deny	Signatures	Date
X		Ketan Thaker Ketan Thaker / Project Manager	February 15, 2022
X		Pravin Patel Pravin C. Patel, P.E. / Environmental Engineer Manager	02/15/2022

Summary of Review

Stormwater from the site drains into Retention Basin 1 and Retention Basin 2. The southern portion of the site with Storage areas 1 and 2 would drain into Retention Basin 1 which has capacity of 15,662 cubic feet. The northern portion of the site would drain into Retention Basin 2 which has capacity of 26,018 cubic feet. Retention Basins 1 and 2 are utilized as a water source to spray the product stockpiles periodically to provide added moisture as needed. The facility also draws water from the basins for dust control at site. Due to this onsite use of water from the retention basins, along with groundwater infiltration and evaporation, the basins do not typically discharge stormwater. However, should discharge occur, stormwater from the basins would discharge to unnamed tributary of Unami Creek through outfalls 001 and 002. When the stormwater leaves the basins, the stormwater would enter a wetland prior to reaching unnamed tributary of Unami Creek.

The previous NPDES permit had semi-annual monitoring requirements for all the parameters on Page no. 2 of NPDES with benchmark values for TSS and Chemical Oxygen Demand (COD) in Part C of the permit similar to Appendix D of General Permit (PAG-03) for Timber Products. We have included effluent limit for pH, TSS and COD in this permit renewal.

The effluent limits and monitoring requirements in the NPDES permit are from Appendix D of the General Permit (PAG-03) for Timber Products.

Following are effluent limits:

PARAMETER	EFFLUENT LIMIT in mg/l	BASIS
Chemical Oxygen Demand	120	PAG-03 Appendix D, BPJ
Total Suspended Solids	100	PAG-03 Appendix D, BPJ
pH (S.U - Standard Units)	6.0 to 9.0 SU all the times	PAG-03 Appendix D, BPJ
Total Arsenic	Report	PAG-03 Appendix D
Total Chromium	Report	PAG-03 Appendix D
Total Copper	Report	PAG-03 Appendix D
Pentachlorophenol	Report	PAG-03 Appendix D

Act-14 Notification to Borough of Quakertown on October 7, 2021

Act-14 Notification to Bucks County on October 7, 2021

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.	001	Design Flow (MGD)	0
Latitude	40Âº 28' 7.12"	Longitude	-75Âº 24' 7.07"
Quad Name		Quad Code	
Wastewater Description:	Stormwater		
Receiving Waters	Unnamed Tributary to Unami Creek (HQ-TSF, MF)	Stream Code	1362
NHD Com ID	25981700	RMI	1.2200
Drainage Area		Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)		Q_{7-10} Basis	
Elevation (ft)		Slope (ft/ft)	
Watershed No.	3-E	Chapter 93 Class.	HQ-TSF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Attaining Use(s)		
Cause(s) of Impairment			
Source(s) of Impairment			
TMDL Status		Name	

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)	

Discharge, Receiving Waters and Water Supply Information

Outfall No.	002	Design Flow (MGD)	0
Latitude	40Âº 28' 7.12"	Longitude	-75Âº 24' 7.07"
Quad Name		Quad Code	
Wastewater Description:	Stormwater		
Receiving Waters	Unnamed Tributary to Unami Creek (HQ-TSF, MF)	Stream Code	1362
NHD Com ID	25981700	RMI	1.2200
Drainage Area		Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)		Q_{7-10} Basis	
Elevation (ft)		Slope (ft/ft)	
Watershed No.	3-E	Chapter 93 Class.	HQ-TSF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Attaining Use(s)		
Cause(s) of Impairment			
Source(s) of Impairment			
TMDL Status		Name	

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)	

Compliance History

DMR Data for Outfall 001 (from January 1, 2021 to December 31, 2021)

Parameter	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21	JUN-21	MAY-21	APR-21	MAR-21	FEB-21	JAN-21
pH (S.U.) Daily Maximum	7.61						7.28					
COD (mg/L) Daily Maximum	1160						1590					
TSS (mg/L) Daily Maximum	123						83					
Total Arsenic (mg/L) Daily Maximum	0.023						0.020					
Total Chromium (mg/L) Daily Maximum	0.027						0.020					
Total Copper (mg/L) Daily Maximum	0.021						0.0052					
Pentachloro-phenol (mg/L) Daily Maximum	< 0.002						< 0.67					

DMR Data for Outfall 002 (from January 1, 2021 to December 31, 2021)

Parameter	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21	JUN-21	MAY-21	APR-21	MAR-21	FEB-21	JAN-21
pH (S.U.) Daily Maximum	7.82						7.31					
COD (mg/L) Daily Maximum	19						117					
TSS (mg/L) Daily Maximum	7						63					
Total Arsenic (mg/L) Daily Maximum	0.023						0.026					
Total Chromium (mg/L) Daily Maximum	< 0.0010						0.0041					
Total Copper (mg/L) Daily Maximum	< 0.0025						0.0043					
Pentachloro-phenol (mg/L) Daily Maximum	< 0.0019						< 0.19					

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	Semi-Annual Average	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/6 months	Grab
COD	XXX	XXX	XXX	120.0	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	100.0	Report	XXX	1/6 months	Grab
Total Arsenic	XXX	XXX	XXX	Report	Report	XXX	1/6 months	Grab
Total Chromium	XXX	XXX	XXX	Report	Report	XXX	1/6 months	Grab
Total Copper	XXX	XXX	XXX	Report	Report	XXX	1/6 months	Grab
Pentachloro-phenol	XXX	XXX	XXX	Report	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 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	Semi-Annual Average	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/6 months	Grab
COD	XXX	XXX	XXX	120.0	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	100.0	Report	XXX	1/6 months	Grab
Total Arsenic	XXX	XXX	XXX	Report	Report	XXX	1/6 months	Grab
Total Chromium	XXX	XXX	XXX	Report	Report	XXX	1/6 months	Grab
Total Copper	XXX	XXX	XXX	Report	Report	XXX	1/6 months	Grab
Pentachloro-phenol	XXX	XXX	XXX	Report	Report	XXX	1/6 months	Grab