pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southeast Regional Office
CLEAN WATER PROGRAM

Application Type	**New**	Application No.	**PA0244996**
Facility Type	**Storm Water**	APS ID	**958501**
Major / Minor	**Minor**	Authorization ID	**1212576**

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

Applicant and Facility Information

Applicant Name	**Universal Concrete Products Corporation**	Facility Name	**Universal Concrete Products**
Applicant Address	400 Old Reading Pike	Facility Address	400 Old Reading Pike
	Stowe, PA 19464-3781		Stowe, PA 19464
Applicant Contact	Donald Faust	Facility Contact	Dan Gichner
Applicant Phone	(610) 819-0012	Facility Phone	(610) 323-0700
Client ID	270849	Site ID	454697
SIC Code	3273	Municipality	West Pottsgrove Township
SIC Description	Manufacturing - Ready-Mixed Concrete	County	Montgomery
Date Application Received	December 26, 2017	EPA Waived?	Yes
Date Application Accepted	August 16, 2019	If No, Reason	

Purpose of Application: New Permit.

Summary of Review

This Fact Sheet summarizes the evaluation of Universal Concrete Products application for a National Pollutant Discharge Elimination System (NPDES) individual permit to discharge stormwater from Universal Concrete Products. This facility is located at 400 Old Reading Pike, Stowe, PA 19464 and discharge stormwater to the Schuylkill River a designated Warm Water Fishes, Migratory Fishes (WWF, MF) under Chapter 93 in watershed 3-D.

Act 14 Notifications:

West Pottsgrove Township - October 24, 2017
Montgomery County - October 24, 2017

Recommended Part C Conditions:

I. Stormwater Outfalls and Authorized Non-Stormwater Discharges
II. Best Management Practices (BMPs)
III. Routine Inspections
IV. Preparedness, Prevention, and Contingency (PPC) Plan
V. Stormwater Monitoring Requirements
VI. Other Requirements
   A. Acquire Necessary Property Rights
   B. Sludge Disposal Requirement
   C. BMPs to Control TSS and pH
   D. Remedial Measures if Public Nuisance
   E. 10-year, 24-Hour Rainfall Event Definition

Approve	Deny	Signatures	Date
X		Juan J. Vicenty-Gonzalez / Environmental Engineering Specialist /S/	August 29, 2019
X		Pravin C. Patel, P.E. / Environmental Engineer Manager /S/	8/29/2019

Summary of Review
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	40º 14' 18.24"	Longitude	-75º 40' 57.10"
Quad Name	Pottstown	Quad Code	08-21-4
Wastewater Description:	Stormwater		
Receiving Waters	Schuylkill River	Stream Code	00833
NHD Com ID	25990578	RMI	55.3
Drainage Area	1050 mi^2	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	291	Q_{7-10} Basis	Pennsylvania StreamStats
Elevation (ft)	703.9	Slope (ft/ft)	
Watershed No.	3-D	Chapter 93 Class.	WWF, MF
Existing Use	**None**	Existing Use Qualifier	N/A
Exceptions to Use	None	Exceptions to Criteria	N/A
Assessment Status	Impaired		
Cause(s) of Impairment	PCB		
Source(s) of Impairment	Source Unknown		
TMDL Status	Final	Name	Schuylkill River PCB TMDL

Changes Since Last Permit Issuance: New Permit.

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	002	Design Flow (MGD)	0
Latitude	40º 14' 13.88"	Longitude	-75º 41' 3.27"
Quad Name	Pottstown	Quad Code	08-21-4
Wastewater Description:	Stormwater		
Receiving Waters	Schuylkill River	Stream Code	00833
NHD Com ID	25990578	RMI	55.3
Drainage Area	1050 mi^2	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	291	Q_{7-10} Basis	Pennsylvania StreamStats
Elevation (ft)	703.9	Slope (ft/ft)	
Watershed No.	3-D	Chapter 93 Class.	WWF, MF
Existing Use	**None**	Existing Use Qualifier	N/A
Exceptions to Use	None	Exceptions to Criteria	N/A
Assessment Status	Impaired		
Cause(s) of Impairment	PCB		
Source(s) of Impairment	Source Unknown		
TMDL Status	Final	Name	Schuylkill River PCB TMDL

Changes Since Last Permit Issuance: New Permit.

Treatment Facility Summary				
Treatment Facility Name: Universal Concrete Product				
Waste Type	**Degree of Treatment**	**Process Type**	**Disinfection**	**Avg Annual Flow (MGD)**
Storm Water				
Hydraulic Capacity (MGD)	**Organic Capacity (lbs/day)**	**Load Status**	**Biosolids Treatment**	**Biosolids Use/Disposal**

Changes Since Last Permit Issuance: New Permit.

Universal Concrete Products facility manufactures pre-cast architectural and structural panels for office buildings, etc. Finished products are stored outside, precipitated solids from treatment system are disposed onsite. Process water is sent through a settling treatment system, stored in a holding tank, neutralized w/muriatic acid (process water is typically pH>9), and sprayed across the storage yard for dust suppression (which the permittee was advised not to use per January 24, 2019 NPDES Compliance Inspection Report). Monthly inspections are conducted via visual inspection during discharge. Any obstructions are manually removed.

The facility contains two outfalls (001& 002) that discharge stormwater to Schuylkill River. Both outfalls have a combined drainage area of 1,571,645 ft^2 with 63% impervious. Below are the outfalls descriptions per January 24, 2019 inspection report.

Outfall 001 receives stormwater through the east side storm ditch approaches the new highway and enters the culvert running under Rt. 422. That ditch collects stormeater from part of the north side storm employee parking lot, the current waste concrete storage pile, a trailer parking area, the concrete production area, and most of the sandblast operation. The sandblast operations use silica/glass products on virgin concrete panels. The residue would classify as clean fill as per DEP SWSS Kevin Bauer. Concrete residues that cannot be utilized in block manufacturing are deposited onsite in the eastern part of the property. Crusher contractors are used to process the waste onsite as needed.

Outfall 002 collects stormwater from the west side culvert running under Rt. 422 collects from the western operational area. This area is flat and has sheet flow with few defined conveyances. Industrial activities in the collection area currently include panel storage, parking areas, equipment maintenance and the acid wash pad. A future panel storage yard is scheduled to be constructed on the western side and will drain to this culvert.

Development of Effluent Limitations

Outfall No.	001	**Design Flow (MGD)**	0
Latitude	40º 14' 26.27"	**Longitude**	-75º 41' 4.46"
Wastewater Description:	Stormwater		

Outfall No.	002	**Design Flow (MGD)**	0
Latitude	40º 14' 29.49"	**Longitude**	-75º 41' 9.47"
Wastewater Description:	Stormwater		

Technology-Based Limitations

Total Suspended Solids

In accordance with the EPA Multi-Sector General Permit – storm water discharges from Concrete and Gypsum Product Manufacturers (SIC 3271-3275) have a benchmark monitoring cutoff concentration for TSS of 100 mg/l. Also, under 40 CFR 411 Cement Facility Manufacturing, Materials Storage Runoff. Any discharge composed of runoff that derives from the storage of materials including raw materials, intermediate products, finished products, and waste materials that are used in or derived from the manufacture of cement has a TSS limit of 50 mg/l. 40 CFR 411, exempts discharges from the technology-based limits for storm events exceeding a 10-year, 24-hour event.

pH

In accordance with 25 Pa Code 95.2 – Industrial wastes shall have a pH of no less than 6 and no greater than 9 S.U. Under this subchapter, exceptions may be made for streams impacted with acid mine drainage. In accordance with 25 Pa Code 93.7 – Specific water quality criteria for pH shall be from 6.0 to 9.0 S.U.

Oil and Grease

In accordance with 25 Pa Code 93.6 – Specific substances to be controlled include, but are not limited to, floating materials, oil, grease, scum and substances which produce color, tastes, odors, turbidity or settle to form deposits. In accordance with 25 Pa Code 95.2 – Wastewaters shall at no time contain more than 15 mg/l of oil as a daily average not more than 30 mg/l of oil at any time, or whatever lesser amount the Department may specify for a given discharge or type or discharge, etc. Reporting requirement is included in this draft permit.

Total Aluminum & Total Iron

The SICs applicable to this facility and submitted in the permit renewal application are 3273 and 3272. These SICs are within the SIC 3271-3275 for Concrete, Gypsum, and Plaster Products. In the new General Permit for Discharge of Stormwater Associated with Industrial Activity (PAG-03) this SIC codes are for Appendix N. Appendix N requires general permits to monitor and report for TSS, pH, Oil and Grease, Total Aluminum, and Total Iron. A reporting requirement for Total Aluminum and Total Iron were added to this permit renewal for all the outfalls to comply with the new requirements of the new PAG-03.

Stormwater BMPs

The EPA Multi-Sector General Permit (MSGP) covers Concrete and Gypsum Product Manufacturers (SIC 3271-3275). Parts 4 and 6 of the MSGP requires that a Storm Water Pollution Prevention Plan (SWPPP) be prepared that includes structural, non-structural and other BMPs. Structural BMPs include structures that typically are used to divert, infiltrate, reuse, or otherwise reduce pollutants in storm water discharges from the site. Storm water BMPs shall be designed to control pollutants to the technology based effluent limits established for the concrete product industry for storm events up to and including a 10-year, 24-hour storm event. The DEP determined that waste stockpiles of concrete are an environmental and safety concern and shall be properly managed by the facility. Specific BMP that requires the removal of stockpiled waste concrete material, and the proper management of excess concrete and truck barrel washings was added in to this permit.

Compliance History	
Summary of DMRs:	New permit, no DMRs yet.
Summary of Inspections:	The site was inspected on January 24, 2019. It was recommended on the NPDES Compliance Inspection Report Additional Comments that the applicant include an additional outfall in their permit application. The applicant was also advised "pH adjusted settled concrete process waste water may not be used for dust suppression".

Other Comments: Per the above described inspection report, the permittee was asked to revise their individual permit application. Universal Concrete's consultant submitted revised outfalls (001 & 002) coordinates on August 21, 2019. The consultant was informed that the final permit will not be issued until the permit application is revised with the required updated information.


Universal Concrete 01-24-19 Insp.pdf


Re_ _External_ 400 Old Reading Pike NPE

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 Quarterly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/quarter	Grab
TSS	XXX	XXX	XXX	50.0	100.0	100	1/quarter	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	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	Average Quarterly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/quarter	Grab
TSS	XXX	XXX	XXX	50.0	100.0	100	1/quarter	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab