Pennsylvania Department of Environmental Protection

Southeast Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0244996**
Facility Type	**Storm Water**	APS ID	**1135003**
Major / Minor	**Minor**	Authorization ID	**1522941**

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

Applicant and Facility Information

Applicant Name	**Universal Concrete Products Corp.**	Facility Name	**Universal Concrete Products**
Applicant Address	400 Old Reading Pk Suite 100	Facility Address	400 Old Reading Pike
	Stowe, PA 19464-3781		Stowe, PA 19464
Applicant Contact	Rebecca Richard CDS	Facility Contact	Rebecca Richard CDS
Applicant Phone	(610) 413-8172	Facility Phone	(610) 413-8172
Client ID	270849	Site ID	454697
SIC Code	3273	Municipality	West Pottsgrove Township
SIC Description	Manufacturing - Ready-Mixed Concrete	County	Montgomery
Date Application Received	April 9, 2025	EPA Waived?	Yes
Date Application Accepted	May 28, 2025	If No, Reason	

Purpose of Application: NPDES permit renewal application.

Summary of Review

The PA Department of Environmental Protection (PADEP/Department) received the NPDES permit renewal application from Universal Concrete Products Corporation (permittee) April 9, 2025, for permittee's Universal Concrete Products (facility). This is an individual industrial stormwater permit (NSIR) located in West Pottsgrove Township, Montgomery County. The discharges are in Schuylkill River (WWF, MF) in state watershed 3-D. The existing permit will expire on August 31, 2025. The terms and conditions of the permit were administratively extended since the renewal application was not received at least 180 days prior to the permit expiration date. Renewal NPDES permit applications under Clean Water program are not covered by DEP's PDG, per 021-2100-001.

This fact sheet is prepared per 40 CFR §124.56.

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, P.E. / Environmental Engineer	July 24, 2025
X		Pravin Patel Pravin C. Patel, P.E. / Environmental Engineer Manager	07/24/2025

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	1740
Wastewater Description:	Stormwater		
Receiving Waters	Schuylkill River (WWF, MF)	Stream Code	00833
NHD Com ID	25990578	RMI	56.51
Drainage Area	1,050 mi^2	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	291	Q_{7-10} Basis	Previous fact sheet
Elevation (ft)	703.9	Slope (ft/ft)	
Watershed No.	3-D	Chapter 93 Class.	WWF, MF
Assessment Status	Impaired		
Cause(s) of Impairment	POLYCHLORINATED BIPHENYLS (PCBS)		
Source(s) of Impairment	SOURCE UNKNOWN		
TMDL Status	Final	Name	Schuylkill River PCB TMDL
Nearest Downstream Public Water Supply Intake	PA American Water Royersford		
PWS Waters	Schuylkill River	Flow at Intake (cfs)	
PWS RMI	46.48	Distance from Outfall (mi)	10.03

Discharge, Receiving Waters and Water Supply Information

Outfall No.	002	Design Flow (MGD)	0
Latitude	40º 14' 24.96"	Longitude	-75º 41' 3.05"
Quad Name	Pottstown	Quad Code	1740
Wastewater Description:	Stormwater		
Receiving Waters	Schuylkill River (WWF, MF)	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	
Elevation (ft)		Slope (ft/ft)	
Watershed No.	3-D	Chapter 93 Class.	WWF, MF
Assessment Status	Impaired		
Cause(s) of Impairment	POLYCHLORINATED BIPHENYLS (PCBS)		
Source(s) of Impairment	SOURCE UNKNOWN		
TMDL Status	Final	Name	Schuylkill River PCB TMDL
Nearest Downstream Public Water Supply Intake	PA American Water Royersford		
PWS Waters	Schuylkill River	Flow at Intake (cfs)	
PWS RMI	46.48	Distance from Outfall (mi)	10.03

Changes Since Last Permit Issuance: None

Other Comments:

Facility Description

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 February 4, 2025 inspection report.

Outfall 001 collects from the southeastern portion of the site. The 001 sampling point is located at the fence line near the southeast drainage culvert that runs beneath the highway. Conditions at the 001 sampling point seemed normal with no obvious compliance issues. No flow from the outfall was observed at the time of inspection and recent eDMR records indicate “no discharge”. In the past it was noted that the outfall flows only during large storm events.

Outfall 002 collects from the western operational area. The western area is flat, making stormwater collection difficult. Some stormwater flow from the northwestern panel storage yard runs to the west and into the roadside collection ditch as sheet flow. The 002 sampling point is located at the fence line near the southwest drainage culvert that runs beneath the highway. A small concrete weir has been placed in the swale that channels stormwater sheet flow toward the culvert. Rock has been placed into the channel upgradient of the outfall due to past sedimentation issues. Pooled water was observed at the fence line, indicating flow at the outfall.

Compliance History

DMR Data for Outfall 002 (from April 1, 2024 to March 31, 2025)

Parameter	MAR-25	FEB-25	JAN-25	DEC-24	NOV-24	OCT-24	SEP-24	AUG-24	JUL-24	JUN-24	MAY-24	APR-24
pH (S.U.) IMIN				8.29			7.66			7.11		
pH (S.U.) IMAX				8.29			7.66			7.11		
TSS (mg/L) Average Quarterly				< 1230.0			< 208.0			139.0		
TSS (mg/L) Daily Maximum				< 1230.0			< 208.0			139.0		
Oil and Grease (mg/L) Average Quarterly				< 5			< 140			< 5		
Oil and Grease (mg/L) IMAX				< 5			< 140			< 5		
Total Aluminum (mg/L) Daily Maximum				< 33.3			< 3.31			2.5		
Total Iron (mg/L) Daily Maximum				< 43.7			< 4.77			3.70		

Compliance History

DMR Data for Outfall 002 (from April 1, 2024 to March 31, 2025)

Parameter	MAR-25	FEB-25	JAN-25	DEC-24	NOV-24	OCT-24	SEP-24	AUG-24	JUL-24	JUN-24	MAY-24	APR-24
pH (S.U.) IMIN				8.29			7.66			7.11		
pH (S.U.) IMAX				8.29			7.66			7.11		
TSS (mg/L) Average Quarterly				< 1230.0			< 208.0			139.0		
TSS (mg/L) Daily Maximum				< 1230.0			< 208.0			139.0		
Oil and Grease (mg/L) Average Quarterly				< 5			< 140			< 5		
Oil and Grease (mg/L) IMAX				< 5			< 140			< 5		
Total Aluminum (mg/L) Daily Maximum				< 33.3			< 3.31			2.5		
Total Iron (mg/L) Daily Maximum				< 43.7			< 4.77			3.70		

Compliance History

Effluent Violations for Outfall 002, from: May 1, 2024 To: March 31, 2025

Parameter	Date	SBC	DMR Value	Units	Limit Value	Units
TSS	06/30/24	Avg Qrtly	139.0	mg/L	50.0	mg/L
TSS	09/30/24	Avg Qrtly	< 208.0	mg/L	50.0	mg/L
TSS	12/31/24	Avg Qrtly	< 1230.0	mg/L	50.0	mg/L
TSS	09/30/24	Daily Max	< 208.0	mg/L	100.0	mg/L
TSS	06/30/24	Daily Max	139.0	mg/L	100.0	mg/L
TSS	12/31/24	Daily Max	< 1230.0	mg/L	100.0	mg/L
Oil and Grease	09/30/24	Avg Qrtly	< 140	mg/L	15	mg/L
Oil and Grease	09/30/24	IMAX	< 140	mg/L	30	mg/L

Existing Limits

For Outfalls 001 and 002:

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum [(1)] 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
Total Suspended Solids	XXX	XXX	XXX	50.0	100.0	100	1/quarter	Grab
Oil and Grease	XXX	XXX	XXX	15	XXX	30	1/quarter	Grab
Aluminum, Total	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
Iron, Total	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab

Summary of inspections

April 4, 2025: RTPT conducted. No violations were noted. No operational compliance issues were observed. An NOV was issued on April 3, 2025 for failure to submit renewal application at least 180 days prior to the permit expiration date.

July 5, 2023: RTPT conducted. No violations were noted. Requested compliance assistance visit to view stormwater collection areas and outfalls as the facility was experiencing difficulties in collecting samples due to low flow.

July 6, 2022: FUI conducted on cited violation as noted during October 26, 2021 inspection. The facility began analyzing for pH at the time of collection.

October 26, 2021: CEI conducted. Violation noted for sampling not being analyzed for pH within 15 minutes of collection.

November 12, 2020: FUI conducted to follow-up on unpermitted discharge from three exterior settling basins. The settling basins were greatly improved to prevent runoff.

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' 22.63" **Longitude** -75º 41' 16.50"
Wastewater Description: Stormwater

Development of effluent limitations for Outfalls 001 and 002

The SIC code for the industrial activities at the site is identified by SIC Code 3272. This SIC code qualifies the facility to be covered under PAG03 Appendix N (Glass, Clay, Cement, Concrete and Gypsum Products). Per Appendix N, the following parameters are to be monitored:

Pollutant	Monitoring Requirements [(1),(2)]		Benchmark Values
	Minimum Measurement Frequency	Sample Type	
Total Nitrogen (mg/L) [(3)]	1 / 6 months	Calculation	XXX
Total Phosphorus (mg/L)	1 / 6 months	Grab	XXX
pH (S.U.)	1 / 6 months	Grab	9.0
Total Suspended Solids (TSS) (mg/L)	1 / 6 months	Grab	100
Total Aluminum (mg/L)	1 / 6 months	Grab	XXX
Total Iron (mg/L)	1 / 6 months	Grab	XXX

Footnotes

(1) In accordance with Part C V.C, the permittee shall conduct additional monitoring if specified by DEP in the letter authorizing permit coverage or other correspondence.

(2) This is the minimum number of sampling events required. Permittees may optionally perform additional sampling.
(3) Total Nitrogen is the sum of Total Kjeldahl-N (TKN) plus Nitrite-Nitrate as N (NO2+NO3-N), where TKN and NO2+NO3-N are measured in the same sample.

All these parameters will be included in this renewal at a frequency of 1/quarter. In addition, the current permit has Oil and Grease monitoring requirements which will be carried over in this renewal due to the fact that the facility stores two 500 gallon AST and one 275 gallon tote of diesel fuel to use for their forklifts and yard trucks. The existing limits for TSS, pH, and Oil and Grease will be continued in the Part A of the permit.

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 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
Total Suspended Solids	XXX	XXX	XXX	50.0	100.0	100	1/quarter	Grab
Oil and Grease	XXX	XXX	XXX	15	XXX	30	1/quarter	Grab
Total Nitrogen	XXX	XXX	XXX	Report	Report	XXX	1/quarter	Calculation
Total Phosphorus	XXX	XXX	XXX	Report	Report	XXX	1/quarter	Grab
Aluminum, Total	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
Iron, Total	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab

Compliance Sampling Location: At Outfall 001

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" (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 Quarterly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/quarter	Grab
Total Suspended Solids	XXX	XXX	XXX	50.0	100.0	100	1/quarter	Grab
Oil and Grease	XXX	XXX	XXX	15	XXX	30	1/quarter	Grab
Total Nitrogen	XXX	XXX	XXX	Report	Report	XXX	1/quarter	Calculation
Total Phosphorus	XXX	XXX	XXX	Report	Report	XXX	1/quarter	Grab
Aluminum, Total	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab
Iron, Total	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	Grab

Compliance Sampling Location: At Outfall 002

Other Comments:

Tools and References Used to Develop Permit	
☐	WQM for Windows Model (see Attachment)
☐	Toxics Management Spreadsheet (see Attachment)
☐	TRC Model Spreadsheet (see Attachment)
☐	Temperature Model Spreadsheet (see Attachment)
☐	Water Quality Toxics Management Strategy, 361-0100-003, 4/06.
☐	Technical Guidance for the Development and Specification of Effluent Limitations, 386-0400-001, 10/97.
☐	Policy for Permitting Surface Water Diversions, 386-2000-019, 3/98.
☐	Policy for Conducting Technical Reviews of Minor NPDES Renewal Applications, 386-2000-018, 11/96.
☐	Technology-Based Control Requirements for Water Treatment Plant Wastes, 386-2183-001, 10/97.
☐	Technical Guidance for Development of NPDES Permit Requirements Steam Electric Industry, 386-2183-002, 12/97.
☐	Pennsylvania CSO Policy, 386-2000-002, 9/08.
☐	Water Quality Antidegradation Implementation Guidance, 391-0300-002, 11/03.
☐	Implementation Guidance Evaluation & Process Thermal Discharge (316(a)) Federal Water Pollution Act, 386-2000-008, 4/97.
☐	Determining Water Quality-Based Effluent Limits, 386-2000-004, 12/97.
☐	Implementation Guidance Design Conditions, 386-2000-007, 9/97.
☐	Technical Reference Guide (TRG) WQM 7.0 for Windows, Wasteload Allocation Program for Dissolved Oxygen and Ammonia Nitrogen, Version 1.0, 386-2000-016, 6/2004.
☐	Interim Method for the Sampling and Analysis of Osmotic Pressure on Streams, Brines, and Industrial Discharges, 386-2000-012, 10/1997.
☐	Implementation Guidance for Section 95.6 Management of Point Source Phosphorus Discharges to Lakes, Ponds, and Impoundments, 386-2000-009, 3/99.
☐	Technical Reference Guide (TRG) PENTOXSD for Windows, PA Single Discharge Wasteload Allocation Program for Toxics, Version 2.0, 386-2000-015, 5/2004.
☐	Implementation Guidance for Section 93.7 Ammonia Criteria, 386-2000-022, 11/97.
☐	Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers, 386-2000-013, 4/2008.
☐	Implementation Guidance Total Residual Chlorine (TRC) Regulation, 386-2000-011, 11/1994.
☐	Implementation Guidance for Temperature Criteria, 386-2000-001, 4/09.
☐	Implementation Guidance for Section 95.9 Phosphorus Discharges to Free Flowing Streams, 386-2000-021, 10/97.
☐	Implementation Guidance for Application of Section 93.5(e) for Potable Water Supply Protection Total Dissolved Solids, Nitrite-Nitrate, Non-Priority Pollutant Phenolics and Fluorides, 386-2000-020, 10/97.
☐	Field Data Collection and Evaluation Protocol for Determining Stream and Point Source Discharge Design Hardness, 386-2000-005, 3/99.
☐	Implementation Guidance for the Determination and Use of Background/Ambient Water Quality in the Determination of Wasteload Allocations and NPDES Effluent Limitations for Toxic Substances, 386-2000-010, 3/1999.
☐	Design Stream Flows, 386-2000-003, 9/98.
☐	Field Data Collection and Evaluation Protocol for Deriving Daily and Hourly Discharge Coefficients of Variation (CV) and Other Discharge Characteristics, 386-2000-006, 10/98.
☐	Evaluations of Phosphorus Discharges to Lakes, Ponds and Impoundments, 386-3200-001, 6/97.
☐	Pennsylvania's Chesapeake Bay Tributary Strategy Implementation Plan for NPDES Permitting, 4/07.
☐	SOP:
☐	Other: