pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southeast Regional Office
CLEAN WATER PROGRAM

Application Type	**Amendment, Major**
Facility Type	**Storm Water**
Major / Minor	**Minor**

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

Application No.	**PA0245143 A-1**
APS ID	**1069007**
Authorization ID	**1405878**

Applicant and Facility Information

Applicant Name	**USSC Acquisition Corp**	Facility Name	**USSC Acquisition Exton Facility**
Applicant Address	101 Gordon Drive	Facility Address	101 Gordon Drive
	Exton, PA 19341		Exton, PA 19341
Applicant Contact	Luke Wuthrich	Facility Contact	Luke Wuthrich
Applicant Phone	(610) 265-3610	Facility Phone	(610) 265-3610
Client ID	326334	Site ID	832197
SIC Code	2531,3499	Municipality	Uwchlan Township
SIC Description	Manufacturing - Fabricated Metal Products, Manufacturing - Public Building and Related Furniture	County	Chester
Date Application Received	July 26, 2022	EPA Waived?	Yes
Date Application Accepted		If No, Reason	

Purpose of Application: Permit amendment

Summary of Review

Applicant requests an amendment to their existing NPDES permit to discharge industrial stormwater from their Exton Facility.

This permit amendment incorporates one existing outfall not previously identified on the facility's permit and five new outfalls constructed during the facility extension.

The facility design and engineers seating for a variety of vehicles including buses, trains, fire engines and ambulances. They also develop fire suppression systems for vehicles.

The facility currently occupies a one-story industrial office/warehouse building. Metals to be recycled are stored inside the building or stored in open containers on impervious surfaces in the rear of the building. Residual waste and recycled cardboard are stored behind the building in closed containers. Hazardous waste is stored within a small building with little chance of encountering stormwater.

The existing permit consists of eight outfalls: 001, 002, 003, 004, 005, 006, 007 and 008

The following are the outfalls incorporated into this draft permit amendment:

Outfall 009 is an existing outfall. it was not previously identified in the permit and receives stormwater from a small patch of grass and part of the driveway near the entrance to the facility. There are no industrial activities or processes present in the drainage area.

Outfall 010 receives stormwater from employee parking lots and rooftop drainage at the newly built extension of the USSC facility. The discharge point is a submerged pipe in a wet pond retention basin to the southeast.

Approve	Deny	Signatures	Date
X		*Sara Abraham* Sara Reji Abraham, E.I.T. / Project Manager	April 5, 2023
X		*Pravin Patel* Pravin C. Patel, P.E. / Environmental Engineer Manager	04/05/2023

Summary of Review

Outfall 011 receives stormwater from a surface rain garden and rooftop drainage at the newly built extension of the USSC facility. The discharge point is a submerged pipe in a wet pond retention basin to the southeast.

Outfalls 012 and 013 receive stormwater from employee parking lots at the newly built extension of the USSC facility. The discharge points are submerged pipes in a wet pond retention basin to the southeast.

Outfall 014 receives stormwater from employee parking lots and rooftop drainage at the newly built extension of the USSC facility. The discharge point is a submerged pipe in a wet pond retention basin to the southeast.

Based on the inspection report and according to the permittee, Outfalls 001 to 005, all discharge to a stormwater basin located on the east side of the property along Gordon Dr. This basin contains a standpipe which discharges to the storm system in Gordon Dr. Therefore Outfalls 001 to 005 are eliminated from the permit and replaced by a new Outfall 015 which is the standpipe in the basin.

Outfall 009: not exposed to industrial activities and no monitoring is needed.

Based on the inspection report, there are no industrial activities occurs in the drainage areas of Outfalls 010 to 014 and no exposure designation is recommended. However, the sample results for Outfalls 012 and 013 show elevated COD concentrations in the discharge. According to the consultant, this could be due to the pond water backing up. However, monitoring is included for both outfalls to be reevaluated at the next permit renewal. The facility may need to take the samples at locations along the outfall line where they are not affected by the pond water.

There are two SIC codes associated with the facility operations; 2531 and 3499. According to the Stormwater General Permit, appendices J and U are applicable. Pollutant parameters from both appendices are incorporated into the permit. Accordingly, the following parameters are required to be monitored at Outfalls 006, 012, 013 and 015: Total Nitrogen, Total Phosphorus, pH, TSS, Oil & Grease, Nitrate +Nitrite – Nitrogen, Total Aluminum, Total Iron, Total Zinc and COD.

Based on the request from the applicant the sampling location for Outfall 006 is changed from its current location to a manhole located closer to the drainage area of the Outfall and will be more representative of the discharge. There is no need to create an Internal Monitoring Point in the permit.

Nothing is changed for the existing Outfalls 007 and 008.

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.

Act 14 Notifications:

Uwchlan Township and Chester County are notified of this permit amendment by the applicant.

Summary of Review

Permit Conditions:

A. Stormwater Outfalls
B. Best Management Practices
C. Routine Inspections
D. PPC Plan
E. Stormwater Monitoring Requirements
F. Acquire Necessary Property Rights
G. Proper Sludge Disposal

Discharge, Receiving Waters and Water Supply Information

Outfall No.	006	Design Flow (MGD)	0
Latitude	40º 3' 25.30"	Longitude	-75º 39' 4.93"
Wastewater Description:	Stormwater		
Receiving Waters	Pine Creek (HQ-TSF, MF)	Stream Code	01530
NHD Com ID	25969690	RMI	1.7200
Watershed No.	3-D	Chapter 93 Class.	HQ-TSF, MF
Assessment Status	Impaired		
Cause(s) of Impairment	cause unknown, flow regime modification		
Source(s) of Impairment	urban runoff/storm sewers		

Discharge, Receiving Waters and Water Supply Information

Outfall No.	007	Design Flow (MGD)	0
Latitude	40º 3' 25.58"	Longitude	-75º 39' 3.15"
Wastewater Description:	Stormwater		
Receiving Waters	Pine Creek (HQ-TSF, MF)	Stream Code	01530
NHD Com ID	25969690	RMI	1.7000
Watershed No.	3-D	Chapter 93 Class.	HQ-TSF, MF
Assessment Status	Impaired		
Cause(s) of Impairment	cause unknown, flow regime modification		
Source(s) of Impairment	urban runoff/storm sewers		

Discharge, Receiving Waters and Water Supply Information

Outfall No.	008	Design Flow (MGD)	0
Latitude	40º 3' 26.13"	Longitude	-75º 39' 0.73"
Receiving Waters	Pine Creek (HQ-TSF, MF)	Stream Code	01530
NHD Com ID	25969690	RMI	1.6600
Watershed No.	3-D	Chapter 93 Class.	HQ-TSF, MF
Assessment Status	Impaired		
Cause(s) of Impairment	cause unknown, flow regime modification		
Source(s) of Impairment	urban runoff/storm sewers		

Discharge, Receiving Waters and Water Supply Information

Outfall No.	009	Design Flow (MGD)	0
Latitude	40º 3' 25.30"	Longitude	-75º 39' 4.93"
Wastewater Description:	Stormwater		
Receiving Waters	Pine Creek (HQ-TSF, MF)	Stream Code	01530
NHD Com ID	25969690	RMI	1.7200
Watershed No.	3-D	Chapter 93 Class.	HQ-TSF, MF
Assessment Status	Impaired		
Cause(s) of Impairment	cause unknown, flow regime modification		
Source(s) of Impairment	urban runoff/storm sewers, urban runoff/storm sewers		

Discharge, Receiving Waters and Water Supply Information

Outfall No.	010	Design Flow (MGD)	0
Latitude	40º 3' 25.30"	Longitude	-75º 39' 4.93"
Wastewater Description:	Stormwater		
Receiving Waters	Pine Creek (HQ-TSF, MF)	Stream Code	01530
NHD Com ID	25969690	RMI	1.7200
Watershed No.	3-D	Chapter 93 Class.	HQ-TSF, MF
Assessment Status	Impaired		
Cause(s) of Impairment	cause unknown, flow regime modification		
Source(s) of Impairment	urban runoff/storm sewers		

Discharge, Receiving Waters and Water Supply Information

Outfall No.	011	Design Flow (MGD)	0
Latitude	40º 3' 25.30"	Longitude	-75º 39' 4.93"
Wastewater Description:	Stormwater		
Receiving Waters	Pine Creek (HQ-TSF, MF)	Stream Code	01530
NHD Com ID	25969690	RMI	1.7200
Watershed No.	3-D	Chapter 93 Class.	HQ-TSF, MF
Assessment Status	Impaired		
Cause(s) of Impairment	cause unknown, flow regime modification		
Source(s) of Impairment	urban runoff/storm sewers		

Discharge, Receiving Waters and Water Supply Information

Outfall No.	012	Design Flow (MGD)	0
Latitude	40º 3' 25.30"	Longitude	-75º 39' 4.93"
Wastewater Description:	Stormwater		
Receiving Waters	Pine Creek (HQ-TSF, MF)	Stream Code	01530
NHD Com ID	25969690	RMI	1.7200
Watershed No.	3-D	Chapter 93 Class.	HQ-TSF, MF
Assessment Status	Impaired		
Cause(s) of Impairment	cause unknown, flow regime modification		
Source(s) of Impairment	urban runoff/storm sewers		

Discharge, Receiving Waters and Water Supply Information

Outfall No.	013	Design Flow (MGD)	0
Latitude	40º 3' 24.89"	Longitude	-75º 39' 7.12"
Wastewater Description:	Stormwater		
Receiving Waters	Pine Creek (HQ-TSF, MF)	Stream Code	01530
NHD Com ID	25969690	RMI	1.7600
Watershed No.	3-D	Chapter 93 Class.	HQ-TSF, MF
Assessment Status	Impaired		
Cause(s) of Impairment	cause unknown, flow regime modification		
Source(s) of Impairment	urban runoff/storm sewers		

Discharge, Receiving Waters and Water Supply Information

Outfall No.	014	Design Flow (MGD)	0
Latitude	40º 3' 24.89"	Longitude	-75º 39' 7.12"
Wastewater Description:	Stormwater		
Receiving Waters	Pine Creek (HQ-TSF, MF)	Stream Code	01530
NHD Com ID	25969690	RMI	1.7600
Watershed No.	3-D	Chapter 93 Class.	HQ-TSF, MF
Assessment Status	Impaired		
cause(s) of impairment	cause unknown, flow regime modification		
source(s) of impairment	urban runoff/storm sewers		

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	015	Design Flow (MGD)	0
Latitude	40º 3' 25.30"	Longitude	-75º 39' 4.93"
Wastewater Description:	Stormwater		
Receiving Waters	Pine Creek (HQ-TSF, MF)	Stream Code	01530
NHD Com ID	25969690	RMI	1.7200
Watershed No.	3-D	Chapter 93 Class.	HQ-TSF, MF
Assessment Status	Impaired		
Cause(s) of Impairment	cause unknown, flow regime modification		
Source(s) of Impairment	urban runoff/storm sewers		

Compliance History

DMR Data for Outfall 001 (from July 1, 2021 to June 30, 2022)

Parameter	JUN-22	MAY-22	APR-22	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21
pH (S.U.) Daily Maximum	6.75						7.18					
COD (mg/L) Daily Maximum	110						150					
TSS (mg/L) Daily Maximum	84						64					
Oil and Grease (mg/L) Daily Maximum	4.4						2.8					
Nitrate-Nitrite (mg/L) Daily Maximum	0.18						0.2					
Total Aluminum (mg/L) Daily Maximum	0.27						< 0.15					
Total Iron (mg/L) Daily Maximum	1.5						0.27					
Total Zinc (mg/L) Daily Maximum	0.096						0.14					

DMR Data for Outfall 002 (from July 1, 2021 to June 30, 2022)

Parameter	JUN-22	MAY-22	APR-22	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21
pH (S.U.) Daily Maximum	7.23						7.41					
TSS (mg/L) Daily Maximum	85						4.7					
Oil and Grease (mg/L) Daily Maximum	2.1						< 1.5					
Nitrate-Nitrite (mg/L) Daily Maximum	0.28						0.046					
Total Aluminum (mg/L) Daily Maximum	0.61						< 0.15					
Total Iron (mg/L) Daily Maximum	1.6						0.25					
Total Zinc (mg/L) Daily Maximum	0.26						0.21					

DMR Data for Outfall 006 (from July 1, 2021 to June 30, 2022)

Parameter	JUN-22	MAY-22	APR-22	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21
pH (S.U.) Daily Maximum	6.78						6.69					
COD (mg/L) Daily Maximum	39						57					
TSS (mg/L) Daily Maximum	180						4.7					
Oil and Grease (mg/L) Daily Maximum	10						2.8					
Nitrate-Nitrite (mg/L) Daily Maximum	0.089						0.16					
Total Aluminum (mg/L) Daily Maximum	0.43						0.16					
Total Iron (mg/L) Daily Maximum	1.1						0.41					
Total Zinc (mg/L) Daily Maximum	0.046						0.080					

Proposed Effluent Limitations and Monitoring Requirements

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	1/6 months	Grab
Chemical Oxygen Demand (COD)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Suspended Solids	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Nitrate-Nitrite as N	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Aluminum, Total	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Iron, Total	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Zinc, Total	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Proposed Effluent Limitations and Monitoring Requirements

Outfall 012, 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	1/6 months	Grab
Chemical Oxygen Demand (COD)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Suspended Solids	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Nitrate-Nitrite as N	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Aluminum, Total	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Iron, Total	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Zinc, Total	XXX	XXX	XXX	XXX	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 013, 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	1/6 months	Grab
Chemical Oxygen Demand (COD)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Suspended Solids	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Nitrate-Nitrite as N	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Aluminum, Total	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Iron, Total	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Zinc, Total	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Proposed Effluent Limitations and Monitoring Requirements

Outfall 015, 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	1/6 months	Grab
Chemical Oxygen Demand (COD)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Suspended Solids	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Nitrate-Nitrite as N	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Aluminum, Total	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Iron, Total	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Zinc, Total	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab