

Application Type Amendment
, Major

Facility Type Storm Water

Major / Minor Minor

NPDES PERMIT FACT SHEET

Application No. PA0245674 A-1

APS ID 1147656

Authorization ID 1544575

Applicant and Facility Information

Applicant Name	<u>Penn Color Inc.</u>	Facility Name	<u>Penn Color Hatfield Plant</u>
Applicant Address	<u>2801 Richmond Road</u> <u>Hatfield, PA 19440-1808</u>	Facility Address	<u>2755 Bergey Road</u> <u>Hatfield, PA 19440-1758</u>
Applicant Contact	<u>Jeffrey Zaskoda</u>	Facility Contact	<u>Jeffrey Zaskoda</u>
Applicant Phone	<u>(215) 997-2221</u>	Facility Phone	<u>(215) 997-2221</u>
Client ID	<u>65245</u>	Site ID	<u>502541</u>
SIC Code	<u>2851</u>	Municipality	<u>Hatfield Township</u>
SIC Description	<u>Manufacturing - Paints and Allied Products</u>	County	<u>Montgomery</u>
Date Application Received	<u>October 7, 2025</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u></u>	If No, Reason	<u></u>
Purpose of Application	<u>DEP initiated Amendment</u>		

Summary of Review

This facility was originally covered under a General Stormwater Permit, PAR150003 issued in 2012.

On January 26, 2023, the facility submitted a Notice of Intent (NOI) for the PAG03 permit renewal. Based on the review, Department requested the facility to conduct Perfluorooctane Sulfonate (PFOS) sampling analysis on their discharge due to the receiving stream impairment for PFOS. Subsequently on June 2, 2023, PFOS sampling results were submitted for all three outfalls discharging from the site. The results showed elevated levels of PFOS in the discharge.

A determination was made that the stormwater discharge from the facility's site can be more appropriately controlled under an individual permit. As a result, a new Individual Stormwater application was submitted for the continuation of the coverage for the facility's discharge.

On October 17, 2024, Department issued an individual NPDES permit for the facility.

The NPDES permit includes conditions that require Penn Color to monitor the stormwater discharge from the facility on a quarterly basis and sets monitoring, record keeping and reporting requirements for various perfluorinated compounds, namely PFOA, PFOS, PFBS, and HFPO-DA.

Condition C.VII of the permit also requires Penn Color to prepare a PFAS reduction plan which requires the facility to complete a source evaluation to determine the source of PFAS in the stormwater effluent, and to determine whether the facility uses or has historically used any materials containing Per- and Polyfluoroalkyl Substances (PFAS). If Penn Color determines that the facility uses or has historically used any products or materials containing PFAS, Penn Color must then perform further evaluations to determine if those products or legacy contamination reasonably can be reduced or eliminated and submit a PFAS reduction plan to the Department within one year of the effective

Approve	Return	Deny	Signatures	Date
X			<i>Sara Abraham</i> Sara Reji Abraham, E.I.T. / Project Manager	October 8, 2025
X			<i>Pravin Patel</i> Pravin C. Patel, P.E. / Environmental Engineer Manager	10/08/2025

Summary of Review

date of the permit. If a reduction plan is submitted to the Department, then Penn Color must implement the plan and submit annual status reports to the Department.

Penn Color appealed the NPDES permit to the Environmental Hearing Board at EHB Docket No. 2024-169-L.

Based on discussions on the wording of the PFAS Reduction Plan requirement between Penn Color and the Department, and on external developments, this amended permit has been prepared incorporating the proposed revised PFAS Reduction Plan requirement.

See the below revised PFAS Reduction Plan requirement included in Part C of the Permit Amendment:

VII. PFAS REDUCTION PLAN

- A. Within 6 months after the effective date of the Permit, the permittee shall initiate a source evaluation to determine the source of PFAS in the effluent and to determine whether the permittee uses or has historically used any materials or products containing Per- and Polyfluoroalkyl Substances (PFAS). For purposes of this Part C.VII, PFAS is limited to:

- a. Perfluorooctanoic acid (PFOA), CAS number 335-67-1
- b. Perfluorobutanesulfonic acid (PFBS), CAS number 375-73-5
- c. Hexafluoropropylene Oxide Dimer Acid (HFPO-DA), CAS number 13252-13-6
- d. Perfluorooctanesulfonic acid (PFOS), CAS number 1763-23-1

- B. Where the permittee determines the facility uses or has historically used any materials or products containing PFAS, the permittee shall evaluate whether use of those products or legacy contamination reasonably can be reduced or eliminated and submit a PFAS Reduction Plan to DEP no later than one year after the effective date of the Permit. The PFAS Reduction Plan should identify the measures that Permittee will take to achieve reduction or elimination of PFAS and shall include a schedule for implementation of all elements of the PFAS Reduction Plan within the term of this permit.

The PFAS Reduction Plan may include:

1. An assessment of the potential to reasonably reduce or eliminate the use of materials or products containing PFAS when a reasonable alternative to using materials or products containing PFAS is available.
 2. Minimization of the potential for the accidental discharge of materials or products containing PFAS through planning, proper operation and maintenance (O&M) practices, and good housekeeping practices.
 3. Decontamination or replacement of equipment where PFAS materials or products have historically been used to reduce the potential for discharges of legacy PFAS following the implementation of product substitution, as applicable.
- C. Upon submission to the Department, the PFAS Reduction Plan will be incorporated by reference into this NPDES permit. The permittee shall implement the PFAS Reduction Plan and any updates consistent with the schedule set forth in the Plan, and in any case shall complete all actions described in the PFAS Reduction Plan within the five-year term of this permit. An annual status report shall be prepared and submitted to DEP which includes a list of potential PFAS sources, a summary of actions taken to implement the PFAS Reduction Plan, a summary of all data collected and evaluated under the Plan including the efficacy of the Plan's reduction measures to reduce PFAS, and any modifications to the Plan, based on the findings. The annual

Summary of Review

report is due by the anniversary of the Permit effective date each year following commencement of plan implementation until the plan is complete.