

Application Type Renewal  
Facility Type Storm Water  
Major / Minor Minor

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

Application No. PA0246891  
APS ID 460282  
Authorization ID 1210157

**Applicant and Facility Information**

Applicant Name	<u>Department of the Army Letterkenny Army Depot</u>	Facility Name	<u>Letterkenny Army Depot Open Burning / Open Detonation Grounds</u>
Applicant Address	<u>1 Overcash Avenue Building 14 Chambersburg, PA 17201-4150</u>	Facility Address	<u>1 Overcash Avenue Chambersburg, PA 17201</u>
Applicant Contact	<u>Douglas Warnock</u>	Facility Contact	<u>Robert Moore</u>
Applicant Phone	<u>(717) 267-5702</u>	Facility Phone	<u>(717) 267-5595</u>
Client ID	<u>83807</u>	Site ID	<u>249465</u>
SIC Code	<u>9711; 4953</u>	Municipality	<u>Letterkenny Township (006) Hamilton Township (007)</u>
SIC Description	<u>Public Admin. - National Security. Trans. &amp; Utilities - Refuse Systems</u>	County	<u>Franklin</u>
Date Application Received	<u>November 1, 2017</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>January 16, 2018</u>	If No, Reason	<u></u>
Purpose of Application	<u>Renewal of Individual Permit to Discharge Industrial Stormwater.</u>		

**Summary of Review**

This is a renewal for an Individual NPDES Permit to Discharge Stormwater Associated with Industrial Activities. This permit covers discharges of industrial stormwater from the Open Burning / Open Detonation Grounds (OB/OD) at Letterkenny Army Depot (Letterkenny). A separate NPDES Permit is in place since the OB/OD grounds are in an area that is unique as compared to the other operations at the facility.

Total Area of Site: 13,870,463 sf. Pervious: 99.9%. Impervious: 0.1%

- Outfall 006 information has been revised.
- **NEW Outfall 007 is being added as part of this renewal.**

Letterkenny Army Depot has (had) the following NPDES Permits:

Permit No	Effective	Expiration	Type of discharge	Outfalls	Active or Terminated (termination date)
PA0246891			SW	006. 007 (NEW)	Active (pending)
PA0010502	6/1/2022	5/31/2027	IWTP	001	Active
			SW	002. 004. 005	
PA087378	n/a	n/a	GWCU	003	Terminated 4/12/2024

**Figure 1: Site Layout Map** shows the locations of the OB/OD grounds, flashing furnace, Drainage areas, and Outfall locations (Figure A-4 OBOD Drainage Sub-Basins, received 4/14/2022 via email).

- **Figure 1a: Site Layout Map zoomed** in to show details of Open Burning Ground 1 and Flashing Furnace.
- **Figure 1b: Site Layout Map zoomed** in to show details of Open Burning Ground 2.
- **Figure 1c: Site Layout Map zoomed** in to show details of Open Detonation Grounds.

Approve	Deny	Signatures	Date
x		<i>Brenda J Fruchtl</i> Brenda J. Fruchtl, P.G. / Licensed Professional Geologist	January 3, 2025
x		<i>Scott M Arwood</i> Scott M. Arwood, P.E. / Environmental Engineer Manager	01/28/2025

### Summary of Review

**PPC Plan:** Per the updated page 2 of the permit application received on 4/14/2022 (*see Attachment J*), the Integrated Contingency (ICP) plan was last updated September 2020. A copy was not included with the application.

#### Changes from the 2013 permit:

- Outfall 007 was added.
- Change in the list of parameters to be sampled at Outfalls 006.
- Part C Stormwater Requirements were updated to reflect changes in the PAG-03 General Permit including different forms for reporting stormwater sampling information and an updated Annual Report.
- Part C Best Management Practices section was updated and expanded to include the BMPs found in the March 23, 2023 PAG-03 General Permit
- Part C Stormwater Requirements were updated and expanded to include Benchmark Values; a section on Corrective Action Plans; and other updates to reflect changes in the PAG-03 General Permit.

#### Timeline of Application.

Currently, the facility is covered under NPDES Permit No PA0246891, which expired on April 30, 2018.

**November 1, 2017** - The renewal application was received. The renewal was due 11/1/2017.

**December 28, 2017** – PADEP sent email requesting additional information. See **Attachment A**.

**January 4, 2018** – PADEP received responses to the 12/28/2017 email which including the following items as requested: revised p 10 of the permit application that includes storm event information; copy of the certified mail receipts; Revised site plan (Figure A-4 Open Burning and Open Detonation (OB/OD) Areas); Topographic map of the entire Letterkenny property (Figure A-1 Property Location); Topographic map of the OB/OD grounds (Figure A-2 USGS Quadrangle of the OB/OD Areas, Flashing Furnace, and Surrounding Areas); and street map showing locations of the other stormwater outfalls. See **Attachment B**.

**January 16, 2018** – Application was accepted as complete. PADEP responded to Letterkenny noting the 1/5/2018 responses were sufficient to end the completeness review. PADEP requested additional information for the technical review. See **Attachment C**.

**May 22, 2018** – PADEP received responses to the 1/16/2018 email which including the following items as requested: Revised site plan with Outfalls (Figure A-4 Open Burning and Open Detonation Areas); Aerial photo of OB/OD grounds showing the outfalls and stormwater flow direction; Topographic map of the entire Letterkenny property with Outfalls (Figure A-1 Property Location); and Topographic map of the OB/OD grounds with outfalls (Figure A-2 USGS Quadrangle of the OB/OD Areas, Flashing Furnace, and Surrounding Areas). See **Attachment D**.

**April 2-4, 2019** – EPA conducted a Multi-media compliance inspection. PADEP Clean Water Program operations staff accompanied EPA during the site inspection. The September 5, 2019 EPA inspection report was received by PADEP on 9/11/2019.

**April 18, 2019** – PADEP Clean Water Program Operations section responded to Letterkenny's 4/17/2019 email asking about the changing the proposed location of the Outfall 007. See **Attachment E**.

**July 24, 2020** – PADEP responded to the 7/24/2020 email from Letterkenny. PADEP is working the renewal. Outfall 007 won't be officially added to the permit until the renewal is issued. See **Attachment F**.

**June 11, 2021** – PADEP Clean Water Program Operations section conducted an inspection of the site. Inspection report was completed and sent to Letterkenny on 6/21/2021. See **Attachment G**.

**February 28, 2022** – PADEP sent a Technical Review Questions email to Letterkenny. See **Attachment H**.

**March 1, 2022** – PADEP received an acknowledgement email to the 2/28/2022 Technical Review Questions email. There have been staff changes. They provided the updated contact information. They will work on responding to my questions. See **Attachment I**.

### Summary of Review

**April 14, 2022** – PADEP received an email providing responses to the 2/28/2022 Technical Review Questions email including updated contacts for the site and the following items as requested: Subpart X Permit Conditions Requiring Sediment Traps; Revised site plan with Outfalls and Drainage Areas (Figure A-4 OBOD Drainage Sub-Basins); and Updated pages 2-5 of the permit application. See **Attachment J**.

#### 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.	006 (Letterkenny Township)	Design Flow (MGD)	n/a (Stormwater)
Latitude	39° 59' 56" (39.998889°)	Longitude	-77° 43' 28" (-77.72444°)
Wastewater Description: Stormwater associated with industrial activity. Open Detonation Grounds			
Receiving Waters	Unnamed Tributary of Rocky Spring Branch (TSF, MF)	Stream Code	60048
NHD Com ID	49484450	RMI	0.1800
Drainage Area	0.14 mi <sup>2</sup> (USGS StreamStats)	Yield (cfs/mi <sup>2</sup> )	0.049
Q <sub>7-10</sub> Flow (cfs)	0.0069	Q <sub>7-10</sub> Basis	USGS StreamStats
Elevation (ft)	669 (USGS StreamStats Elevation Profile Tool)	Slope (ft/ft)	
Watershed No.	13-C	Chapter 93 Class.	TSF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	Aquatic Life: FLOW REGIME MODIFICATION, SILTATION Recreational: PATHOGENS		
Source(s) of Impairment	Aquatic Life: HABITAT MODIFICATION - OTHER THAN HYDROMODIFICATION, SOURCE UNKNOWN Recreational: SOURCE UNKNOWN		
TMDL Status	No TMDL	Name	n/a
Nearest Downstream Public Water Supply Intake	Hagerstown MD		
PWS Waters	Potomac River	Flow at Intake (cfs)	---
PWS RMI	---	Distance from Outfall (mi)	~ 57

**Additional information:**

- Drains 4,095,817 sq. ft. (approximate 94 acres). 0.2% Impervious. Open Detonation Grounds.
- Description of Treatment or BMPs in Drainage Area to Control Pollutants to Stormwater: Sedimentation basin with skimmer, emergency spillway, rock lined outfall, seeded bare ground to control erosion. ICP to address spill prevention and spill response.

**Changes Since Last Permit Issuance:**

- The location of Outfall 006 has been updated.
- The drainage area has been updated / revised. The 2012 Application listed a total area drained by Outfall 006 as 82.9 acres and included the Open Burning and Open Detonation grounds.
- Sampling parameters have been updated.

**Discharge, Receiving Waters and Water Supply Information**

Outfall No.	<u>007 (Hamilton Township). <b>NEW</b></u>	Design Flow (MGD)	<u>n/a (Stormwater)</u>
Latitude	<u>39° 59' 39" (39.9941667°)</u>	Longitude	<u>-77° 44' 28" (-77.74111°)</u>
Wastewater Description:	<u>Stormwater associated with industrial activity. Open Burning, Static Firing, Flashing Furnace.</u>		
Receiving Waters	<u>Unnamed Tributary to Back Creek (TSF, MF)</u>	Stream Code	<u>59902</u>
NHD Com ID	<u>49479882</u>	RMI	<u>0.0200</u>
Drainage Area	<u>0.32 mi<sup>2</sup> (USGS StreamStats)</u>	Yield (cfs/mi <sup>2</sup> )	<u>0.0119</u>
Q <sub>7-10</sub> Flow (cfs)	<u>0.00381</u>	Q <sub>7-10</sub> Basis	<u>USGS StreamStats</u>
Elevation (ft)	<u>650 (USGS StreamStats Elevation Profile Tool)</u>	Slope (ft/ft)	
Watershed No.	<u>13-C</u>	Chapter 93 Class.	<u>TSF, MF</u>
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	<u>Impaired</u>		
Cause(s) of Impairment	<u>Aquatic Life: SILTATION, TURBIDITY Recreational: PATHOGENS</u>		
Source(s) of Impairment	<u>Aquatic Life: GRAZING IN RIPARIAN OR SHORELINE ZONES, SOURCE UNKNOWN Recreational: SOURCE UNKNOWN</u>		
TMDL Status	<u>No TMDL</u>	Name	<u>n/a</u>
Nearest Downstream Public Water Supply Intake	<u>Hagerstown MD</u>		
PWS Waters	<u>Potomac River</u>	Flow at Intake (cfs)	<u>---</u>
PWS RMI	<u>---</u>	Distance from Outfall (mi)	<u>~55 miles</u>

**Additional information:**

- Drains 9,774,646 sq. ft. (approximate 224 acres). 0.1% Impervious. Open Burning Grounds, Static Firing, Flashing Furnace.
- Description of Treatment or BMPs in Drainage Area to Control Pollutants to Stormwater: Sediment traps and diversion dikes were installed to minimize erosion.

**Changes Since Last Permit Issuance:**

- **NEW OUTFALL**

Compliance History	
Summary of DMRs:	<ul style="list-style-type: none"> <li>• See Table 1 below.</li> <li>• Per Part C of their existing permit (issued 4/9/2013), the “Additional Information for the Reporting for Stormwater Discharge Monitoring” form (3800-PM-WSFR0083t) shall be submitted as an attachment to the DMR. <ul style="list-style-type: none"> <li>○ PADEP records indicate they have consistently been submitting this form as an attachment when uploading stormwater sample results to DEP’s eDMR system since 2018. Paper copies of this form were sent to PADEP – SCRO office along with the required DMRs prior to 2018.</li> </ul> </li> </ul>
Summary of Inspections:	<p>The facility has been inspected three times by PADEP since the last NPDES permit renewal (May 2013). See Table 2.</p> <p>In addition, EPA conducted a multi-media inspection April 2-4, 2019.</p>
Summary of Violations:	<ul style="list-style-type: none"> <li>• As of 12/29/24, there is 1 Open Violation for Client 83807. <ul style="list-style-type: none"> <li>○ See Table 3 below.</li> </ul> </li> <li>• Since the last permit renewal in May 2013, there have been 2 violations. <ul style="list-style-type: none"> <li>○ See Table 4 below.</li> </ul> </li> <li>• There have been no violations in the past 5 years for NPDES Permit No PA0246891.</li> </ul>
Annual Reports	<ul style="list-style-type: none"> <li>• Per Part C of their existing permit (issued 4/9/2013), the permittee shall conduct an annual inspection of each outfall and record the results on the “Annual Inspection Form for NPDES Permits for Discharges of Stormwater Associated with Industrial Activities” (3800-PM-WSFR0083v, <ul style="list-style-type: none"> <li>○ PADEP records indicate they have consistently been submitting this form as an attachment when uploading stormwater sample results to DEP’s eDMR system since 2018. Paper copies of this form were sent to PADEP – SCRO office along with the required DMRs prior to 2018.</li> </ul> </li> </ul>

**Table 1. DMR Data for Outfall 006 (from January 2018 to June 2024)**

Parameter (Daily Max)	Jan to Jun 2024	Jul to Dec 2023	Jan to Jun 2023	Jul to Dec 2022	Jan to Jun 2022	Jul to Dec 2021	Jan to Jun 2021	Jul to Dec 2020	Jan to Jun 2020	Jul to Dec 2019	Jan to Jun 2019	Jul to Dec 2018	Jan to Jun 2018
2,4-Dinitrotoluene (mg/L)	< 0.072	<b>0.33</b>	< 0.000038	< 0.00019	< 0.00070	< 0.00019	< 0.00019	< 0.00019	< 0.00019	< 0.00019	< 0.19	< 0.006	< 0.00019
2-Amino-4,6- dinitrotoluene (mg/L)	< 0.072	< 0.066	< 0.000066	< 0.00019	< 0.000085	< 0.00019	< 0.00019	< 0.00019	< 0.00019	< 0.00019	< 0.00019	< 0.005	< 0.00019
4-Amino-2,6- dinitrotoluene (mg/L)	< 0.072	< 0.11	< 0.00011	< 0.00019	< 0.002	< 0.00019	< 0.00019	< 0.00019	< 0.00019	< 0.00019	< 0.00019	< 0.004	< 0.00019
Aluminum, Total (mg/L)	3.2	1.1	2.5	1.1	380	0.90	0.49	1.9	0.42	0.57	< 0.5	13.9	0.31
Ammonia (mg/L)	< 0.03	0.158	0.145	0.793	1.3	< 0.146	0.146	0.200	< 0.100	0.328	< 0.1	0.453	0.483
Arsenic, Total (mg/L)	< 0.0032	< 0.0016	< 0.0016	< 0.0050	<b>0.024</b>	< 0.0050	< 0.005	< 0.0050	< 0.0050	< 0.005	< 0.05	<b>0.0062</b>	< 0.005
Chloride (mg/L)	4.9	4.4	4.3	3.5	3.3	4.9	4.9	9.1	4.9	5.1	6.00	5.4	6.4
Fluoride (mg/L)	0.35	0.26	0.24	< 0.20	0.74	0.29	< 0.20	0.38	0.36	0.44	< 0.2	0.32	0.42
HMX (mg/L)	<b>0.58</b>	< 0.057	<b>0.47</b>	<b>0.002</b>	<b>0.0025</b>	< 0.00019	< 0.00019	<b>0.00040</b>	< 0.00019	<b>0.00041</b>	< 0.00019	<b>0.00059</b>	<b>0.00063</b>
Iron, Total (mg/L)	6.1	2.4	4.4	1.6	760	1.4	0.68	3.2	0.54	1.1	3.1	24.7	0.47
Lead, Total (mg/L)	0.049	0.011	0.021	0.025	7.2	0.027	0.0067	0.012	< 0.0030	0.0044	< 0.03	0.038	0.43
Manganese, Total (mg/L)	0.66	0.36	0.37	0.41	19.0	0.55	0.24	0.23	0.086	0.22	0.44	0.37	0.81
Mercury, Total (mg/L)	< 0.00016	< 0.00016	< 0.00016	< 0.0002	<b>0.0064</b>	< 0.00020	< 0.0002	<b>0.23</b>	< 0.0002	< 0.0002	< 0.0002	<b>0.00021</b>	< 0.0002
Nickel, Total (mg/L)	0.017	0.0054	0.0078	< 0.010	2.1	0.013	< 0.01	< 0.010	< 0.010	< 0.01	0.28	0.032	< 0.01
Nitrate (mg/L)	< 0.22	< 0.22	0.24	2.0	12.0	< 1.0	0.44	2.0	< 0.20	8.0	2.6	5.9	8.9
pH (S.U.)	8.47	8.44	8.19	8.25	7.4	8.1	8.1	7.6	8.37	7.94	8.09	7.24	8.44
RDX (mg/L)	<b>0.75</b>	<b>0.17</b>	<b>0.85</b>	<b>0.0069</b>	<b>0.0085</b>	<b>0.00075</b>	<b>0.00075</b>	<b>0.0021</b>	<b>0.00031</b>	<b>0.0033</b>	< 0.00019	<b>0.0024</b>	<b>0.0017</b>
Sulfate (mg/L)	147	92.9	104.0	23.2	200	107	107	137	109	125.0	170	50.4	124
Total Dissolved Solids (mg/L)	406	324	366.0	314.0	210	284	284	320	264.0	320	417	103	323
TSS (mg/L)	533	61	95.0	125.0	38000	145	52	130	22.0	29	7	428.0	25
Zinc, Total (mg/L)	0.24	0.10	0.14	0.16	46	0.16	0.04	0.083	0.031	< 0.037	< 0.1	0.45	0.038

**BOLD Italicized results** are above ND.

**BOLD RED italicized results** are greater than the MSC for TDS < 2500; Used Aquifer, R for 2,4 Dinitrotoluene; HMX, and RMX.

**NPDES Permit Fact Sheet**  
**Letterkenny Army Depot**

**NPDES Permit No. PA0246891**

**Table 2. Summary of past INSPECTIONS for NPDES Permit No PA0246891**

**WATER MANAGEMENT SYSTEM INSPECTIONS** 12/29/2024 5:19:30 PM

**Inspection Date Range: 1/1/2013 To 12/29/2024**

**Region: SCRO; County: All; Municipality: All**

**Program: 18 - WPC, 90 - WPCWP, 88 - WPCNP, 80 - WP537, 84 - WPCES**

**PF Kind: All**

**PF Status: All**

**Fee Category: All**

**Inspection Type: All**

**Permit: PA0246891**

**Inspector(s):**

**Inspection Category: PF**

**PF Type: WPCF - Water Pollution Control Facility**

**Total Inspections: 3**

PERMIT	FACILITY NAME	PF KIND	INSP PROGRAM	PF TYPE	INSP ID	INSP CATEGORY	INSPECTED DATE	INSP TYPE	AGENCY	INSPECTION RESULT DESC	INSPECTOR	INSPECTION COMMENT	CREATION DATE	UPDATE DATE	# OF VIOLATIONS
PA0246891	LETTERKENNY ARMY DEPOT OPEN BURNING/OPEN DETONATION GROUNDS	Stormwater-Industrial	WPCNP	Water Pollution Control Facility	<a href="#">3208094</a>	PF	06/11/2021	Compliance Evaluation	PA Dept of Environmental Protection	No Violations Noted	BETTINGER, BRANDON		06/21/2021	06/21/2021	0
PA0246891	LETTERKENNY ARMY DEPOT OPEN BURNING/OPEN DETONATION GROUNDS	Stormwater-Industrial	WPCNP	Water Pollution Control Facility	2297385	PF	07/01/2014	Follow-up Inspection	PA Dept of Environmental Protection	Recurring Violations	CLARK, FREDERICK		08/22/2014	10/03/2014	<a href="#">1</a>
PA0246891	LETTERKENNY ARMY DEPOT OPEN BURNING/OPEN DETONATION GROUNDS	Stormwater-Industrial	WPCNP	Water Pollution Control Facility	2297380	PF	05/07/2014	Routine/Partial Inspection	PA Dept of Environmental Protection	Violation(s) Noted	CLARK, FREDERICK		08/22/2014	11/15/2017	<a href="#">1</a>



Table 3. Summary of OPEN VIOLATIONS for CLIENT 83807 USARMY Letterkenny Army Depot

WATER MANAGEMENT SYSTEM OPEN VIOLATIONS BY CLIENT 12/29/2024 5:40:31 PM

Permit: PA0246891  
Client: All

Open Violations: 1

CLIENT ID	CLIENT	PF ID	FACILITY	PF KIND	PF STATUS	INSP PROGRAM	PROGRAM SPECIFIC ID	INSP ID	VIOLATION ID	INSPECTION CATEGORY	VIOLATION DATE	VIOLATION CODE	VIOLATION	PF INSPECTOR	INSP REGION	INSPECTED SITE ID	INSPECTED SITE
83807	USARMY LETTERKENNY ARMY DEPOT	526404	LETTERKENNY ARMY DEPOT		Active	Hazardous Waste	PA6213820503	3848391	8204036	PF	09/16/2024	262.17A6	LQG Emergency preparedness and prevention and Contingency Plan requirements		SCRO		

**Table 4. Summary of PAST VIOLATIONS for NPDES Permit No PA0246891**

WATER MANAGEMENT SYSTEM eFACTS VIOLATIONS 11/29/2024 1:23:59 PM

Region: SCRO; County: All; Municipality: All

Program: 18 - WPC, 90 - WPCWP, 88 - WPCNP, 80 - WP537, 84 - WPCES

PF Kind: All

PF Status: All

Fee Category: All

Permit: PA0246891

Inspection Category: PF

Open Violations Only: No

92A Violations Only: No

Violation Type: All

Single Event Violations Only: No

Circuit Rider System Only: No

# of Violations: 2

INSP PROGRAM	VIOL ID	VIOLATION DATE	VIOLATION TYPE	VIOLATION TYPE DESC	RESOLVED DATE	INSP ID	INSP CATEGORY	INSPECTED DATE	INSP TYPE	INSPECTOR	VIOLATION COMMENT
WPCNP	703177	05/07/2014	92A.41(A)5	NPDES - Failure to properly operate and maintain all facilities which are installed or used by the permittee to achieve compliance	09/17/2014	2297380	PF	05/07/2014	Routine/Partial Inspection	CLARK, FREDERICK	SW basin not vegetated or functioning properly
WPCNP	703184	07/01/2014	92A.41(A)5	NPDES - Failure to properly operate and maintain all facilities which are installed or used by the permittee to achieve compliance	09/17/2014	2297385	PF	07/01/2014	Follow-up Inspection	CLARK, FREDERICK	Sed Basin not functional

## Development of Effluent Limitations

Outfall No. 006 and 007 Design Flow (MGD) n/a (stormwater)  
Wastewater Description: Stormwater

Since the discharge is from stormwater associated with Industrial Activity, no limits have been developed. Benchmarks have been added for some of the parameters since the permit was last issued.

The same monitoring requirements proposed for Outfall 006 are also proposed for Outfall 007 since the nature of the stormwater is the same as Outfall 006.

According to the February 19, 2013 Fact Sheet, a complete investigation of the sediments in the OB/OD area was previously conducted. The data indicated the parameters listed as monitor and report in the previous permit renewal (see **Table 5** below for list of parameters) were of concern.

2-Amino-4,6-dinitrotoluene, and 4-Amino-2,6-dinitrotoluene were not detected during any of the sample events since 2018. However, both parameters were 2 of the original parameters based on the analysis of the sediments, so they will remain. All the other parameters listed in **Table 5** below were found to be present in the stormwater during at least one sampling event since 2018. Due to the varying nature of the runoff, all of the above parameters will remain in the permit.

**Table 6** below lists the proposed parameter list and sampling requirements including footnotes detailing the changes made from the previous permit.

The permit will include Part C conditions for REQUIREMENTS APPLICABLE TO STORMWATER UTFALLS based on the March 24, 2023 PAG-03 General Permit Part C Special Conditions and Appendix A.

**Best Professional Judgment (BPJ) Limitations**

**Table 5. Previous Permit Monitoring Requirements for Outfalls 006** (effective May 1, 2013 through April 30, 2018)

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Daily Maximum	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	6.0	XXX	XXX	9.0	2/year	Grab
Total Suspended Solids	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
Total Dissolved Solids	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
Ammonia-Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
Nitrate as N	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
Total Arsenic	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
Fluoride	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
Total Lead	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
Total Manganese	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
Total Mercury	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
Total Nickel	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Daily Maximum	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Sulfate	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
Total Zinc	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
2,4-Dinitrotoluene	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
2-Amino-4,6-dinitrotoluene	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
4-Amino-2,6-dinitrotoluene	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
Chloride	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
HMX	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab
RDX	XXX	XXX	XXX	XXX	Report	XXX	2/year	Grab

**Table 6. Proposed Monitoring Requirements, Outfalls 006 AND 007.**

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.) <sup>2</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
<b>COD</b> <sup>1,2</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS <sup>2</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Dissolved Solids <sup>3</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
<b>Total Nitrogen</b> <sup>1,2</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Calculation
Ammonia – Nitrogen <sup>2</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Nitrate <sup>3</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
<b>Total Phosphorus</b> <sup>1,2</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Aluminum <sup>3</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Arsenic <sup>2</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
<b>Total Cadmium</b> <sup>1,2</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
<b>Total Cyanide</b> <sup>1,2</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Fluoride <sup>3</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron <sup>3</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Lead <sup>2</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Manganese <sup>3</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Mercury <sup>2</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Total Nickel <sup>3</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Selenium <sup>1,2</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Silver <sup>1,2</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Sulfate <sup>3</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Zinc <sup>3</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
2,4-Dinitrotoluene <sup>3</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
2-Amino-4,6-dinitrotoluene <sup>3</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
4-Amino-2,6-dinitrotoluene <sup>3</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Chloride <sup>3</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
HMX <sup>3</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
RDX <sup>3</sup>	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

**Footnotes and Explanation for proposed stormwater monitoring requirements.**

- <sup>1</sup> **These parameters have been added to the parameter list** for the following reason: If the facility were to qualify for a PAG-03, the facility's stormwater associated with industrial activity would fall under Appendix A – HAZARDOUS WASTE TREATMENT, STORAGE, OR DISPOSAL FACILITIES based on their SIC Code 4953, which includes monitoring requirements for these **additional parameters: COD, Total Nitrogen, Total Phosphorus, Total Cadmium, Total Cyanide, Total Selenium, and Total Silver** (along with pH, TSS, Ammonia-Nitrogen, Total Arsenic, Total Lead, and Total Mercury which were already included the current permit).
- <sup>2</sup> Appendix A Parameters
- <sup>3</sup> All of the other stormwater parameters, which are not part of Appendix A, will be retained from the previous permit due to their potential to be in the stormwater including: Total Dissolved Solids, Nitrate, Total Aluminum, Total Fluoride, Total Iron, Total Manganese, Total Nickel, Total Sulfate, Total Zinc, 2,4-Dinitrotoluene, 2-Amino-4,6-dinitrotoluene, 4-Amino-2,6-dinitrotoluene, Chloride, HMX, and RDX

**RECOMMENDED PART C LANGUAGE**

(see comments 1 and 2 below)

**I. STORMWATER OUTFALLS AND AUTHORIZED NON-STORMWATER DISCHARGES**

A. The permittee is authorized to discharge non-polluting stormwater from its site through the following outfalls:

Outfall No.	Area Drained (ft <sup>2</sup> )	Latitude	Longitude	Description
006	4,095,817	39° 59' 56"	-77° 43' 28"	Open Detonation
007	9,774,646	39° 59' 39"	-77° 44' 28"	Open Burning, Static Firing, Flashing Furnace

Monitoring requirements and effluent limitations for these outfalls are specified in Part A of this permit, if applicable.

B. The permittee is authorized to discharge the following non-stormwater discharges under this permit:

- Discharges from emergency/unplanned fire-fighting activities;
- Potable water, including water line flushings and fire hydrant flushings, that do not contain measurable concentrations of Total Residual Chlorine (TRC), and where appropriate control measures are implemented to minimize discharges of mobilized solids and other pollutants (e.g., filtration, detention, settlement);
- Uncontaminated condensate from air conditioners, coolers/chillers, and other compressors (if treatment through an oil/water separator is provided) and from the outside storage of refrigerated gases or liquids;
- Irrigation drainage;
- Landscape water if such water does not contain pesticides, herbicides or fertilizers;
- Pavement wash waters, other than wash waters used on newly sealed pavement, where: no detergents or hazardous cleaning products are used; the wash waters do not come into contact with oil and grease deposits; sources of pollutants associated with industrial activities, or any other toxic or hazardous materials; and appropriate control measures are implemented to minimize discharges of mobilized solids and other pollutants (e.g., filtration, detention, settlement);
- Routine external building washdown / power wash water that does not use detergents or hazardous cleaning products (e.g., those containing bleach, hydrofluoric acid, muriatic acid, sodium hydroxide, nonylphenols) and where appropriate control measures are implemented to minimize discharges of mobilized solids and other pollutants (e.g., filtration, detention, settlement);
- Uncontaminated ground water or spring water;
- Foundation or footing drains where flows are not contaminated with process materials; and
- Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of a facility, but not intentional discharges from the cooling tower.

The permittee is also authorized to discharge sector-specific non-stormwater discharges identified in the appropriate paragraph in Part C of this Permit, if applicable. Collectively, these types of discharges are "authorized non-stormwater discharges."

**II. BEST MANAGEMENT PRACTICES (BMPs)**

The permittee shall implement and, as necessary, maintain the following BMPs to remain in compliance with this permit.

- The permittee shall select, design, and implement BMPs to meet non-numeric and water quality-based effluent limitations.
- The permittee shall maintain all control measures that are used to achieve the effluent limits in this permit in effective operating condition, as well as all industrial equipment and systems, in order to minimize pollutant discharges.
- Pollution Prevention and Exposure Minimization.

The permittee shall minimize the exposure of manufacturing, processing, and material storage areas (including

loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff in order to minimize pollutant discharges by either locating industrial materials and activities inside or protecting them with storm resistant coverings wherever feasible. The permittee shall implement and maintain the following measures, at a minimum:

1. Use grading, berming or curbing to prevent runoff of polluted stormwater and divert run-on away from areas that contain or have the potential to generate polluted stormwater.
2. Locate materials, equipment, and activities so that potential leaks and spills are contained or able to be contained or diverted before discharge to surface waters.
3. Clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants to surface waters.
4. Store leaky vehicles and equipment indoors or, if stored outdoors, use drip pans and absorbents to prevent the release of pollutants to the environment.
5. Use spill/overflow protection equipment.
6. Perform all vehicle and/or equipment cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray. Store all vehicle and equipment maintenance materials – such as oils, hydraulic fluids, and lubricants – indoors or under storm resistant coverings, with adequate spill protection measures in place.
7. Drain fluids from equipment and vehicles that will be decommissioned, and, for any equipment and vehicles that will remain unused for extended periods of time, inspect at least monthly for leaks.
8. Keep all dumpster lids closed when not in use. For dumpsters and roll off boxes that do not have lids, ensure that discharges have a control (e.g., secondary containment, treatment). This permit does not authorize dry weather discharges from dumpsters or roll off boxes.
9. Minimize contamination of stormwater runoff from fueling areas by implementing the following BMPs where determined to be feasible: cover fueling areas; install oil/water separators or oil and grease traps in fueling area storm drains; use berms to prevent run-on to and runoff from fueling areas; use spill/overflow protection and cleanup equipment; use dry cleanup methods; and/or treat and/or recycle collected stormwater runoff.
10. Train employees routinely (no less than annually) on pollution prevention practices as contained in the PPC Plan.

**D. Good Housekeeping.**

The permittee shall perform good housekeeping measures in order to minimize pollutant discharges including the routine implementation of the following measures, at a minimum:

1. Implement a routine cleaning and maintenance program for all impervious areas of the facility where particulate matter, dust or debris may accumulate to minimize the discharge of pollutants in stormwater. The cleaning and maintenance program must encompass, as appropriate, areas where material loading and unloading, storage, handling and processing occur.
2. Store materials in appropriate containers.
3. Minimize the potential for waste, garbage and floatable debris to be discharged by keeping exposed areas free of such materials, or by intercepting them before they are discharged.
4. Eliminate floor drain connections to storm sewers.

5. Use drip pans, drain boards, and drying racks to direct drips back into a fluid holding tank for reuse. Drain fluids from all equipment and parts prior to disposal. Promptly transfer used fluids to the proper container; do not leave full drip pans or other open containers around the shop. Empty and clean drip pans and containers.
6. Label and track the recycling of waste material (e.g., used oil, spent solvents, batteries).
7. Prohibit the practice of hosing down an area where the practice would result in the discharge of pollutants to a municipal or other storm water collection system that conveys pollutants off-site without proper treatment.
8. Maintain the accessibility of all outfall locations for the purposes of inspections and sampling.

**E. Erosion and Sediment Controls.**

1. The permittee shall minimize erosion and pollutant discharges by stabilizing exposed soils and placing flow velocity dissipation devices at discharge locations to minimize channel and stream bank erosion and scour in the immediate vicinity of stormwater outfalls.
2. The permittee shall conduct all earth disturbance activities and, when applicable, shall maintain all post-construction stormwater management (PCSM) BMPs in accordance with 25 Pa. Code Chapter 102.
3. The permittee may not utilize polymers or other chemicals to treat stormwater unless written permission is obtained from DEP.

**F. Spill Prevention and Responses.**

The permittee shall minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop a plan consistent with Part C IV for effective responses to such releases. The permittee shall conduct the following spill prevention and response measures, at a minimum:

1. Maintain an organized inventory of materials on-site. Plainly label containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides") that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur.
2. Implement procedures for material storage and handling, including the use of secondary containment and barriers between material storage and traffic areas, or a similarly effective means designed to prevent the discharge of pollutants from these areas.
3. Develop and implement employee and contractor training on the procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases. The permittee shall conduct periodic training, no less than annually, and document the training on the Annual Report required by Part A III.C.1.
4. Keep spill kits on-site, located near areas where spills may occur or where a rapid response can be made.
5. Notify appropriate facility personnel when a leak, spill, or other release occurs.
6. To the extent possible, eliminate or reduce the number and amount of hazardous materials and waste by substituting non-hazardous or less hazardous materials of equal function, as determined by the permittee.
7. Clean up leaks, drips, and other spills without using large amounts of water or liquid cleaners. Use absorbents for dry cleanup whenever possible.

When a leak, spill or other release occurs during a 24-hour period that contains a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under 40 CFR Parts 110, 117 or 302, the permittee shall, in addition to the notification requirements contained in Part A III.C.3 of this permit, notify the National Response Center (NRC) at (800) 424-8802 in accordance with the requirements of 40 CFR Parts 110, 117, and 302 as soon as the permittee becomes aware of the discharge.



### III. STORMWATER MONITORING REQUIREMENTS

- A. The permittee shall conduct monitoring of its stormwater discharges at the representative outfalls identified in Part A of this permit. The permittee shall document stormwater sampling event information and no exposure conditions for each calendar year on the Annual Report required by Part A III.C.1. (see comment 3 below)
- B. The permittee shall, upon written notice from DEP, install inlets, pipes, and/or other structures or devices that are considered necessary in order to conduct representative stormwater sampling, in accordance with a schedule provided by DEP.
- C. The permittee shall collect all samples from discharges resulting from a storm event that is greater than 0.1 inch in magnitude and that occurs at least 72 hours from the previously measurable (greater than 0.1-inch rainfall) storm event. The 72-hour storm interval is waived when the preceding storm did not yield a measurable discharge, or if the permittee is able to document that a less than 72-hour interval is representative for local storm events during the sample period.
- D. The permittee shall collect all grab samples within the first 30 minutes of a discharge, unless the permittee determines that this is not possible, in which case grab samples must be collected as soon as possible after the first 30 minutes of a discharge. The permittee shall explain why samples could not be collected within the first 30 minutes of any discharge on the Annual Report required by Part A III.C.1.
- E. The permittee shall collect stormwater samples at times when commingling with non-stormwater discharges is not occurring or at locations prior to the commingling of non-stormwater discharges.
- F. In the event that stormwater discharge concentrations for a parameter exceeds the benchmark values identified below at the same outfall for two or more consecutive monitoring periods, the permittee shall implement a corrective action plan to reduce the concentrations of the parameters in stormwater discharges in accordance with Paragraph G below. (see comment 4 below)

Pollutant	Benchmark Values
pH (S.U.)	9.0
Total Suspended Solids (TSS) (mg/L)	100
Chemical Oxygen Demand (COD) (mg/L)	120

#### G. Corrective Action Plan

1. In the event that stormwater discharge concentrations for a parameter exceeds the benchmark value(s) identified above at the same outfall for two or more consecutive monitoring periods, the permittee shall implement the following, based on the number of consecutive exceedances identified:
  - a. After **two or more** consecutive exceedances of benchmark values (starting on the effective date of this Permit), develop a corrective action plan (CAP) to reduce the concentrations of the pollutants in stormwater discharges. Failure to submit and implement a CAP constitutes non-compliance.

The permittee shall submit the CAP to DEP within 90 days of the end of the monitoring period triggering the need for the plan and shall implement the plan immediately or in accordance with a schedule proposed by the permittee in the CAP, unless otherwise notified by DEP in writing. The permittee shall, in developing the plan, evaluate alternatives to reduce stormwater concentrations and implement all relevant and feasible control measures, unless the permittee can demonstrate one or more of the following:

- i. The exceedances are solely attributable to natural background sources or to run-on from off-site;
- ii. No further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice; or
- iii. Further pollutant reductions are not necessary to prevent stormwater discharges from causing or contributing to an exceedance of applicable water quality standards.

- b. After **four or more** consecutive exceedances of benchmark values (starting on the effective date of this Permit), the permittee shall develop a CAP and consider implementation of all additional stormwater BMPs outlined in the Stormwater BMPs Checklist (3800-PM-BCW0083I) for the applicable appendix. Failure to submit and implement a CAP and the Stormwater BMPs Checklist constitutes non-compliance with this Permit.

The permittee shall submit a new CAP and include the Stormwater BMPs Checklist (3800-PM-BCW0083I) to certify that all applicable controls have been considered for implementation within 90 days of the end of the monitoring period for which the fourth or more consecutive exceedance was identified. For each BMP in the checklist that is not implemented, the permittee shall demonstrate one or more of the following:

- i. The BMP is infeasible for the facility;
- ii. The exceedances are solely attributable to natural background sources or to run-on from off-site;
- iii. The exceedances were due to some aberration or extraordinary circumstances; or
- iv. Further pollutant reductions are not necessary to prevent stormwater discharges from causing or contributing to an exceedance of applicable water quality standards.

The permittee shall identify on the Stormwater BMPs Checklist that either the BMPs have been implemented or a reason why they were infeasible or not applicable. The Stormwater BMPs Checklist shall be included with the CAP for each additional consecutive exceedance.

#### IV. ROUTINE INSPECTIONS (see comment 5 below)

- A. The permittee shall visually inspect the following areas and BMPs on a semiannual basis (calendar periods), at a minimum:

1. Areas where industrial materials or activities are exposed to stormwater.
2. Areas identified in the PPC Plan as potential pollutant sources.
3. Areas where spills or leaks have occurred in the past three years.
4. Stormwater outfalls and locations where authorized non-stormwater discharges may commingle.
5. Physical BMPs used to comply with this permit.

At least once each calendar year, the routine inspection must be conducted during a period when a stormwater discharge is occurring.

- B. The permittee shall evaluate and document the following conditions, at a minimum, in the Annual Report required by Part A III.C.1 through required inspections:

1. Raw materials, products or wastes that may have or could come into contact with stormwater.
2. Leaks or spills from equipment, drums, tanks and other containers.
3. Off-site tracking of industrial or waste materials, or sediment where vehicles enter or exit the site.
4. Tracking or blowing of raw, final or waste materials from areas of no exposure to exposed areas.
5. Control measures or BMPs needing replacement, maintenance or repair.
6. The presence of authorized non-stormwater discharges that were not identified in the permit application and non-stormwater discharges not authorized by this permit.

**V. PREPAREDNESS, PREVENTION AND CONTINGENCY (PPC) PLAN**

- A. The permittee shall develop and implement a PPC Plan in accordance with 25 Pa. Code § 91.34 following the guidance contained in DEP's "Guidelines for the Development and Implementation of Environmental Emergency Response Plans" (DEP ID 400-2200-001), its NPDES-specific addendum and the minimum requirements below.
1. The PPC Plan must identify all potential sources of pollutants that may reasonably be expected to affect the quality of stormwater discharges from the facility.
  2. The PPC Plan must describe preventative measures and BMPs that will be implemented to reduce or eliminate pollutants from coming into contact with stormwater resulting from routine site activities and spills.
  3. The PPC Plan must address actions that will be taken in response to on-site spills or other pollution incidents.
  4. The PPC Plan must identify areas which, due to topography or other factors, have a high potential for soil erosion, and identify measures to limit erosion. Where necessary, erosion and sediment control measures must be developed and implemented in accordance with 25 Pa. Code Chapter 102 and DEP's "Erosion and Sediment Pollution Control Manual" (DEP ID 363-2134-008).
  5. The PPC Plan must address security measures to prevent accidental or intentional entry which could result in an unintentional discharge of pollutants.
  6. The PPC Plan must include a plan for training employees and contractors on pollution prevention, BMPs, and emergency response measures. This training must be conducted in accordance with Part C II.D.3.
  7. If the facility is subject to SARA Title III, Section 313, the PPC Plan must identify releases of "Water Priority Chemicals" within the previous three years. Water Priority Chemicals are those identified in EPA's "Guidance for the Determination of Appropriate Methods for the Detection of Section 313 Water Priority Chemicals" (EPA 833-B-94-001, April 1994). The Plan must include an evaluation of all activities that may result in the stormwater discharge of Water Priority Chemicals.
  8. Spill Prevention Control and Countermeasure (SPCC) plans may be used to meet the requirements of this section if the minimum requirements are addressed.
- B. The permittee shall review and if necessary update the PPC Plan on an annual basis, at a minimum, and when one or more of the following occur:
1. Applicable DEP or federal regulations are revised, or this permit is revised.
  2. The PPC Plan fails in an emergency.
  3. The facility's design, industrial process, operation, maintenance, or other circumstances change in a manner that materially increases the potential for fires, explosions or releases of toxic or hazardous constituents; or which changes the response necessary in an emergency.
  4. The list of emergency coordinators or equipment changes.
  5. When notified in writing by DEP.

The permittee shall maintain all PPC Plan updates on-site, make the updates available to DEP upon request, and document the updates in Annual Reports.

**VI. OTHER REQUIREMENTS**

- A. The approval herein given is specifically made contingent upon the permittee acquiring all necessary property rights by easement or otherwise, providing for the satisfactory construction, operation, maintenance or

replacement of all structures associated with the herein approved discharge in, along, or across private property, with full rights of ingress, egress and regress.

- B. Collected screenings, slurries, sludges, and other solids shall be handled, recycled and/or disposed of in compliance with the Solid Waste Management Act (35 P.S. §§ 6018.101 – 6018.1003), 25 Pa. Code Chapters 287, 288, 289, 291, 295, 297, and 299 (relating to requirements for landfilling, impoundments, land application, composting, processing, and storage of residual waste), Chapters 261a, 262a, 263a, and 270a (related to identification of hazardous waste, requirements for generators and transporters, and hazardous waste, requirements for generators and transporters, and hazardous waste permit programs), federal regulation 40 CFR Part 257, The Clean Streams Law, and the Federal Clean Water Act and its amendments. Screenings collected at intake structures shall be collected and managed and not be returned to the receiving waters.

The permittee is responsible to obtain or assure that contracted agents have all necessary permits and approvals for the handling, storage, transport and disposal of solid waste materials generated as a result of wastewater and stormwater treatment.

**Comments regarding major additions and changes to the above recommended Part C Special Conditions**

1. *There have been significant changes to the layout and content of the stormwater requirements since the permit was last issued in 2013.*
2. *Previously all the REQUIREMENTS APPLICABLE TO STORMWATER OUTFALLS were under Part C. II. These have since been broken down into the following sections and greatly expanded:*
  - a. *Part C. I. STORMWATER OUTFALLS AND AUTHORIZED NON-STORMWATER DISCHARGES*
  - b. *Part C. II. BEST MANAGEMENT PRACTICES (BMPs)*
  - c. *Part C. III. STORMWATER MONITORING REQUIREMENTS*
  - d. *Part C. IV. ROUTINE INSPECTIONS*
  - e. *Part C. V. PREPAREDNESS, PREVENTION AND CONTINGENCY (PPC) PLAN*
3. *The “Annual Inspection” form and the “Additional Information for the Reporting of Stormwater Monitoring” form has been replaced with the more comprehensive Annual Report. Note: previously the “Annual Inspection” form was required to be available upon request and retained as part of the PPC plan. The Annual Report is now required to be submitted annually to the DEP office that issued the permit.*
4. *Benchmark Values have been added for pH; TSS; and COD since these benchmark values are found in Appendix A of the 2023 PAG-03 NPDES General Permit.*
5. *Routine inspections are now required on a semiannual basis (previously this was only required once per year).*

**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 006, Effective Period: Permit Effective Date through Permit Expiration Date.**

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> 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
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Dissolved Solids	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Calculation
Ammonia	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Nitrate	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Arsenic	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Cadmium	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Cyanide	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Fluoride	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Outfall 006 , Continued (from Permit Effective Date through Permit Expiration Date )

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Total Lead	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Manganese	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Mercury	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nickel	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Selenium	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Silver	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Sulfate	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Zinc	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
2,4-Dinitrotoluene	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
2-Amino-4,6-dinitrotoluene	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
4-Amino-2,6-dinitrotoluene	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Chloride	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
HMX	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
RDX	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Compliance Sampling Location: Outfall 006

**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 007, Effective Period: Permit Effective Date through Permit Expiration Date.**

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> 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
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Dissolved Solids	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Calculation
Ammonia	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Nitrate	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Aluminum	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Arsenic	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Cadmium	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Cyanide	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Fluoride	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Outfall 007 , Continued (from Permit Effective Date through Permit Expiration Date )

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Total Lead	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Manganese	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Mercury	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nickel	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Selenium	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Silver	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Sulfate	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Zinc	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
2,4-Dinitrotoluene	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
2-Amino-4,6-dinitrotoluene	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
4-Amino-2,6-dinitrotoluene	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Chloride	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
HMX	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
RDX	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Compliance Sampling Location: Outfall 007





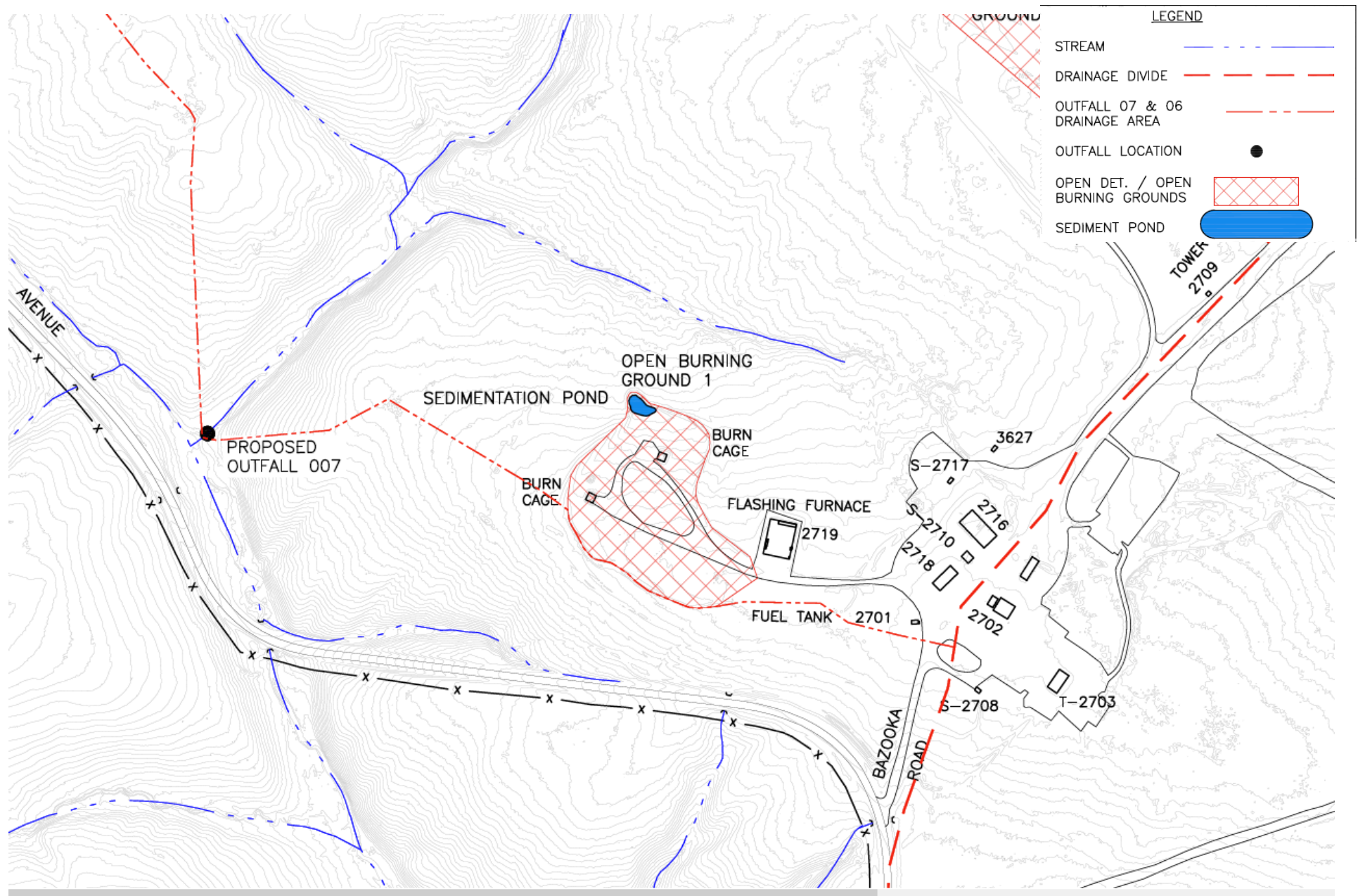


Figure 1a: Site Layout Map zoomed in to show details of Open Burning Ground 1 and Flashing Furnace.



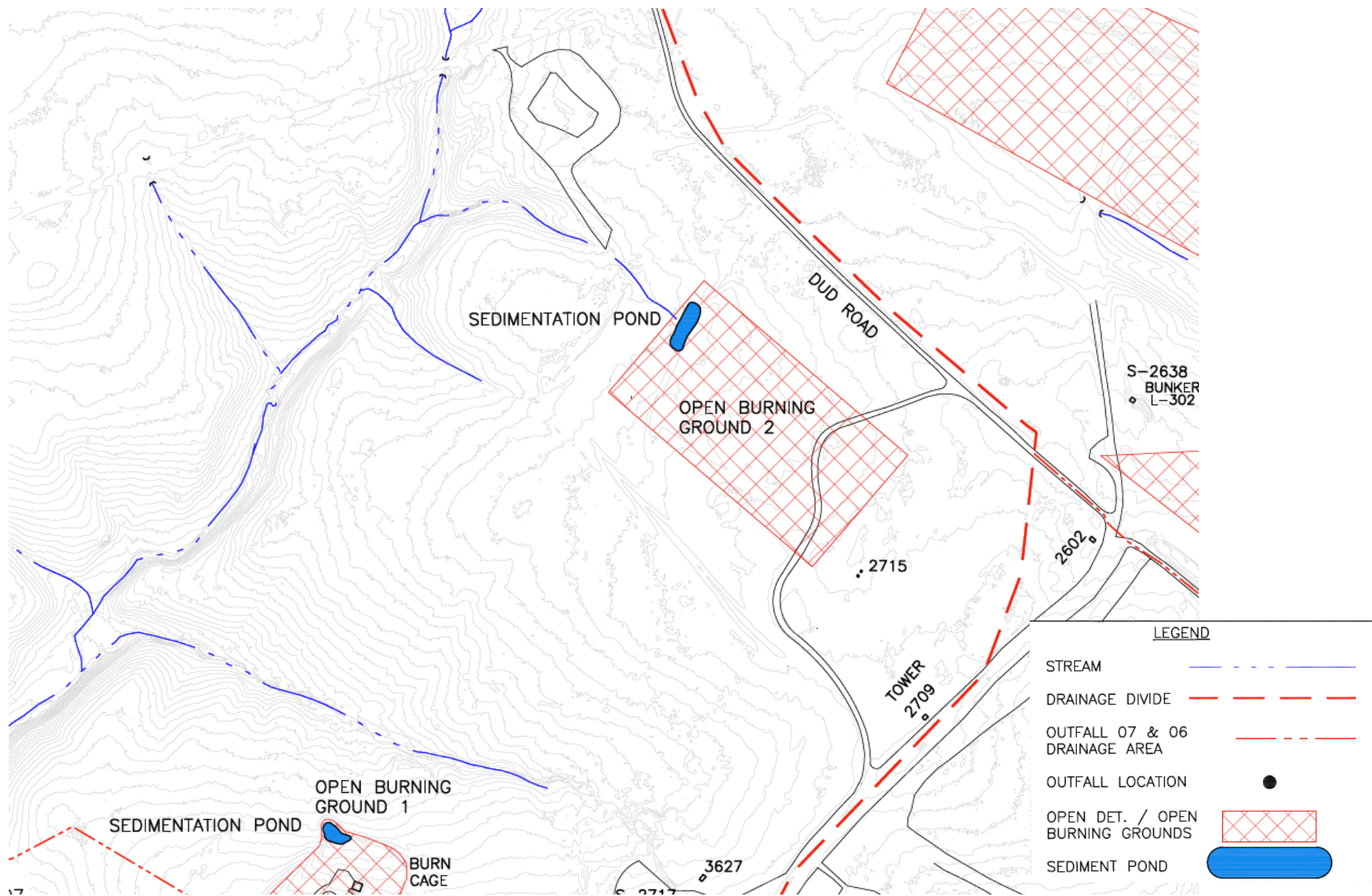
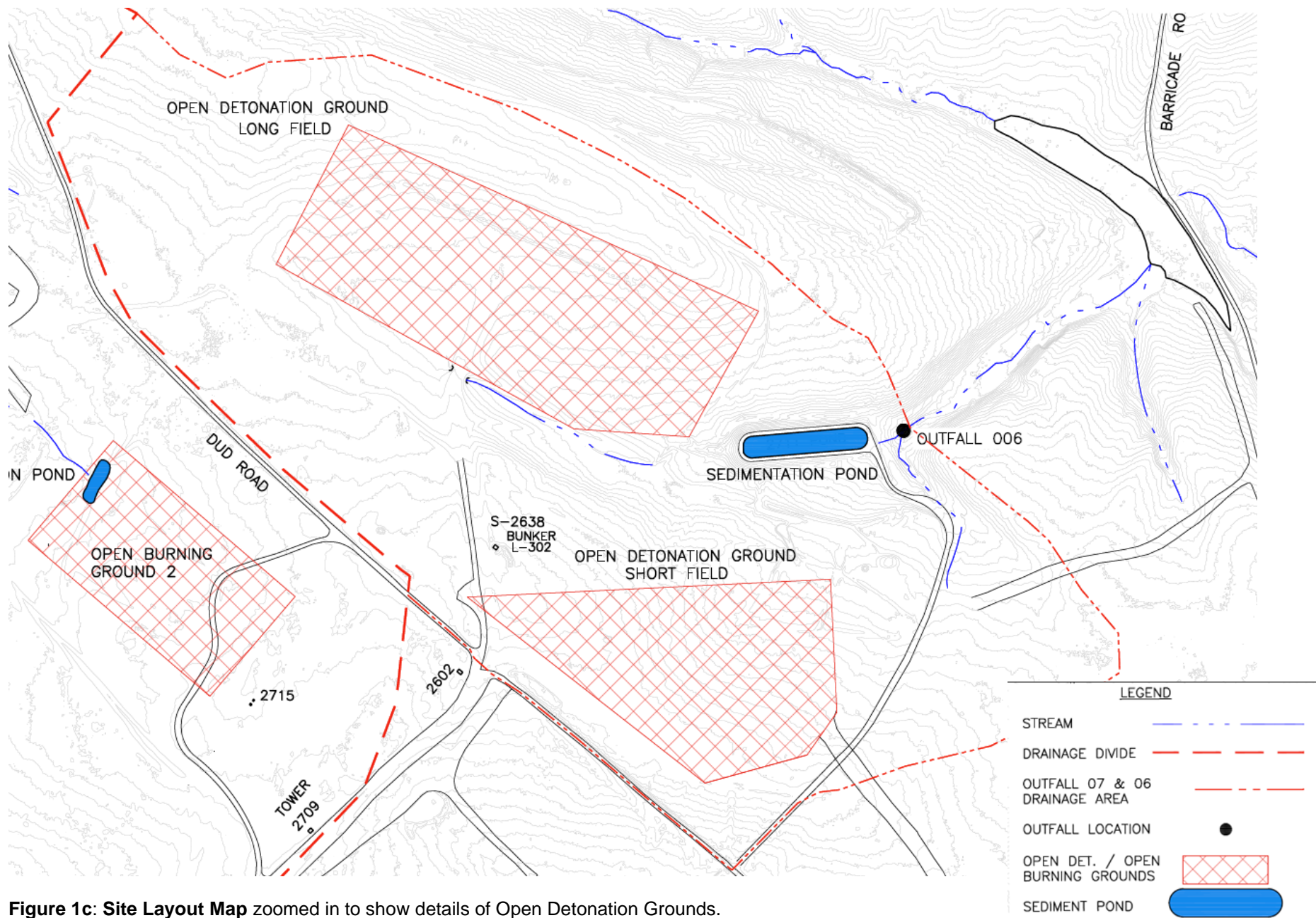


Figure 1b: Site Layout Map zoomed in to show details of Open Burning Ground 2.



## Attachment A

### 12/28/2017 PADEP email

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**Fruchtl, Brenda**

---

**From:** Fruchtl, Brenda  
**Sent:** Thursday, December 28, 2017 9:35 AM  
**To:** Kendle, Erin R CIV (US) (erin.r.kendle.civ@mail.mil)  
**Subject:** NPDES Permit No PA0246891. Letterkenny Army Depot OB/OD Grounds. \*\*ADDITIONAL INFORMATION REQUEST\*\*

**Importance:** High

Good Morning,

PADEP received the Industrial Stormwater renewal application for NPDES Permit No PA0246891, Letterkenny Army Depot – OB/OD Grounds, on November 1, 2017.

Upon my review, I noticed a few administrative completeness errors that need addressed prior to me ending the administrative review portion of the application.

1. **Storm Event Information.** Please provide the information about the storm event(s) in Question 4 of the Stormwater Sampling Results Section of the NPDES Application for Individual Permit to Discharge Industrial Stormwater. (*\*see page 8 of the instructions*)
2. **Act 14 – Evidence of Receipt.** Please provide evidence that municipalities and county received your notification. Acceptable forms of this evidence include certified mail receipt or written acknowledgement of the notification from the municipalities and county. Note: The application package included copies of the letters and copies of the certified mail sender information, but not the certified receipt signed by the recipient. (*\*see pages 2 and 3 of the instructions*)
3. **Site Plan.** Attached a site plan that identifies structures, facilities, outdoor raw material, product and waste storage areas, drainage areas, discharge points, property boundaries and waters of the Commonwealth. The site plan included in the application package does not show drainage areas, property boundaries or waters of the Commonwealth. Please add these items to the site plan. (*\*see page 4 of the instructions*)
4. **Topographic Map.** Please include a topographic map (smaller scale than aerial photo submitted) showing the property boundary for the entire Letterkenny property in relationship to the surrounding area including the outfall locations for the other 2 NPDES Permits for reference. (*\*see page 4 of the instructions*)

*\*Please reference the instructions for further explanation:*

<http://www.elibrary.dep.state.pa.us/dsweb/Get/Document-116148/3800-PM-BCW0403a%20Instructions.pdf>

Please submit the information above to my attention – email is acceptable if that is easiest or mail to my attention at the address below.

Please acknowledge receipt of this request along with an approximate timeframe for providing the additional information.

Once I receive this information, I can end my completeness review and move onto the technical review.

Please contact me if you have any questions.

**Brenda Fruchtl, P.G.** | Licensed Professional Geologist  
Department of Environmental Protection  
Southcentral Regional Office Building  
909 Elmerton Avenue | Harrisburg, PA 17110  
Phone: 717.705.4812 | Fax: 717.705.4760  
[www.depweb.state.pa.us](http://www.depweb.state.pa.us)



## Attachment B

1/4/2018 email response and attachments.

**Fruchtl, Brenda**

---

**From:** Kendle, Erin R CIV (US) <erin.r.kendle.civ@mail.mil>  
**Sent:** Thursday, January 4, 2018 12:13 PM  
**To:** Fruchtl, Brenda  
**Subject:** RE: [Non-DoD Source] NPDES Permit No PA0246891. Letterkenny Army Depot OB/OD Grounds. \*\*ADDITIONAL INFORMATION REQUEST\*\* (UNCLASSIFIED)  
**Attachments:** Certified Mail Receipts.pdf; OBOD Areas.pdf; Other Stormwater Outfalls.png; Property Location.pdf; Updated Page 10.pdf

CLASSIFICATION: UNCLASSIFIED

Good morning Ms. Fruchtl,

The following information is attached:

1. Page 10 containing storm event information for Question 4
2. Certified mail receipts (one receipt was not received so the USPS delivery confirmation is included)
3. Site plan labeled "OBOD Areas". Waste ash is accumulated in the red "Open Burning Ground 1" area.
4. Topographic maps showing the entire Letterkenny property, the quadrangle showing the OBOD Grounds, and the location of the other stormwater outfalls. If there is still any information you need that is not shown, we can try to make a new map with what you need.

Please let me know if you need anything else.  
Thank you,

Erin Kendle  
Letterkenny Army Depot  
Environmental Management Division  
(717)267-5595

-----Original Message-----

From: Fruchtl, Brenda [mailto:bfruchtl@pa.gov]  
Sent: Thursday, December 28, 2017 9:35 AM  
To: Kendle, Erin R CIV (US) <erin.r.kendle.civ@mail.mil>  
Subject: [Non-DoD Source] NPDES Permit No PA0246891. Letterkenny Army Depot OB/OD Grounds. \*\*ADDITIONAL INFORMATION REQUEST\*\*  
Importance: High

3800-PM-BCW0403b 2/2017  
Permit Application

[illegible]

**NPDES Permit Fact Sheet**  
**Letterkenny Army Depot**

**NPDES Permit No. PA0246891**

(Item 2 listed in the 1/4/2018 email. Proof of delivery.)

Page 1 of 1

<p><b>SENDER: COMPLETE THIS SECTION</b></p> <p>■ Complete items 1, 2, and 3.          ■ Print your name and address on the reverse so that we can return the card to you.          ■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>Franklin County Planning Commission          Administrative Annex          218 N. 2nd Street          Chambersburg, PA 17201</p> <p>9590 9402 1475 5329 4473 40</p> <p>2. Article Number (Transfer from service label)  <u>7016 2070 0001 1562 6543</u></p> <p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>	<p><b>COMPLETE THIS SECTION ON DELIVERY</b></p> <p>A. Signature <u>[Signature]</u> <input type="checkbox"/> Agent <input type="checkbox"/> Address</p> <p>B. Received by (Printed Name) <u>JA Holder</u> <input type="checkbox"/> Date of Delivery <u>11-1-17</u></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No          If YES, enter delivery address below:</p> <p>3. Service Type <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail (over \$500)</p> <p><input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation® <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p>Domestic Return Receipt</p>
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**70162070000115626525**

70162070000115626525

Delivered:

ORRSTOWN, PA 17244 on November 7, 2017 at 9:51 am

<p><b>SENDER: COMPLETE THIS SECTION</b></p> <p>■ Complete items 1, 2, and 3.          ■ Print your name and address on the reverse so that we can return the card to you.          ■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>Hamilton Township          1270 Crottlestown Rd          Chambersburg, PA 17201</p> <p>9590 9402 1475 5329 4473 64</p> <p>2. Article Number (Transfer from service label)  <u>7016 2070 0001 1562 6544</u></p> <p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>	<p><b>COMPLETE THIS SECTION ON DELIVERY</b></p> <p>A. Signature <u>[Signature]</u> <input type="checkbox"/> Agent <input type="checkbox"/> Address</p> <p>B. Received by (Printed Name) <u>JA HOLDER</u> <input type="checkbox"/> Date of Delivery <u>11-1-17</u></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No          If YES, enter delivery address below:</p> <p>3. Service Type <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail (over \$500)</p> <p><input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation® <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p>Domestic Return Receipt</p>
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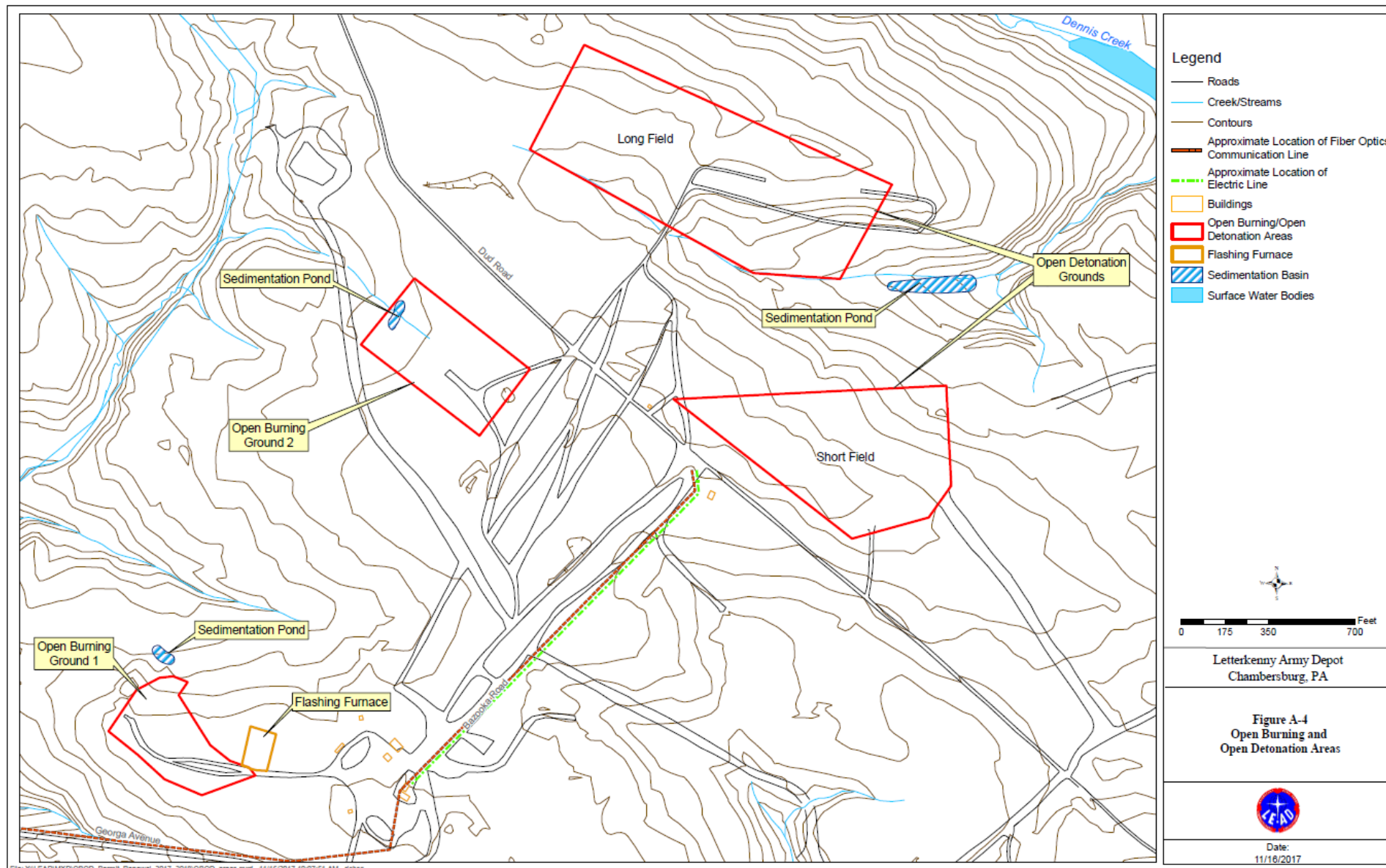
<p><b>SENDER: COMPLETE THIS SECTION</b></p> <p>■ Complete items 1, 2, and 3.          ■ Print your name and address on the reverse so that we can return the card to you.          ■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>Greene Township Board of Supervisors          1145 Garver Lane          P.O. Box 215          Scotland, PA 17254-0125</p> <p>9590 9402 1475 5329 4473 57</p> <p>2. Article Number (Transfer from service label)  <u>7016 2070 0001 1562 6556</u></p> <p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>	<p><b>COMPLETE THIS SECTION ON DELIVERY</b></p> <p>A. Signature <u>[Signature]</u> <input type="checkbox"/> Agent <input type="checkbox"/> Address</p> <p>B. Received by (Printed Name) <u>Gina Gifford</u> <input type="checkbox"/> Date of Delivery <u>11-1-17</u></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No          If YES, enter delivery address below:</p> <p>3. Service Type <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail (over \$500)</p> <p><input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation® <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p>Domestic Return Receipt</p>
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<https://m.usps.com/m/TrackConfirmAction?tLabels=70162070000115626525>

1/2/2018

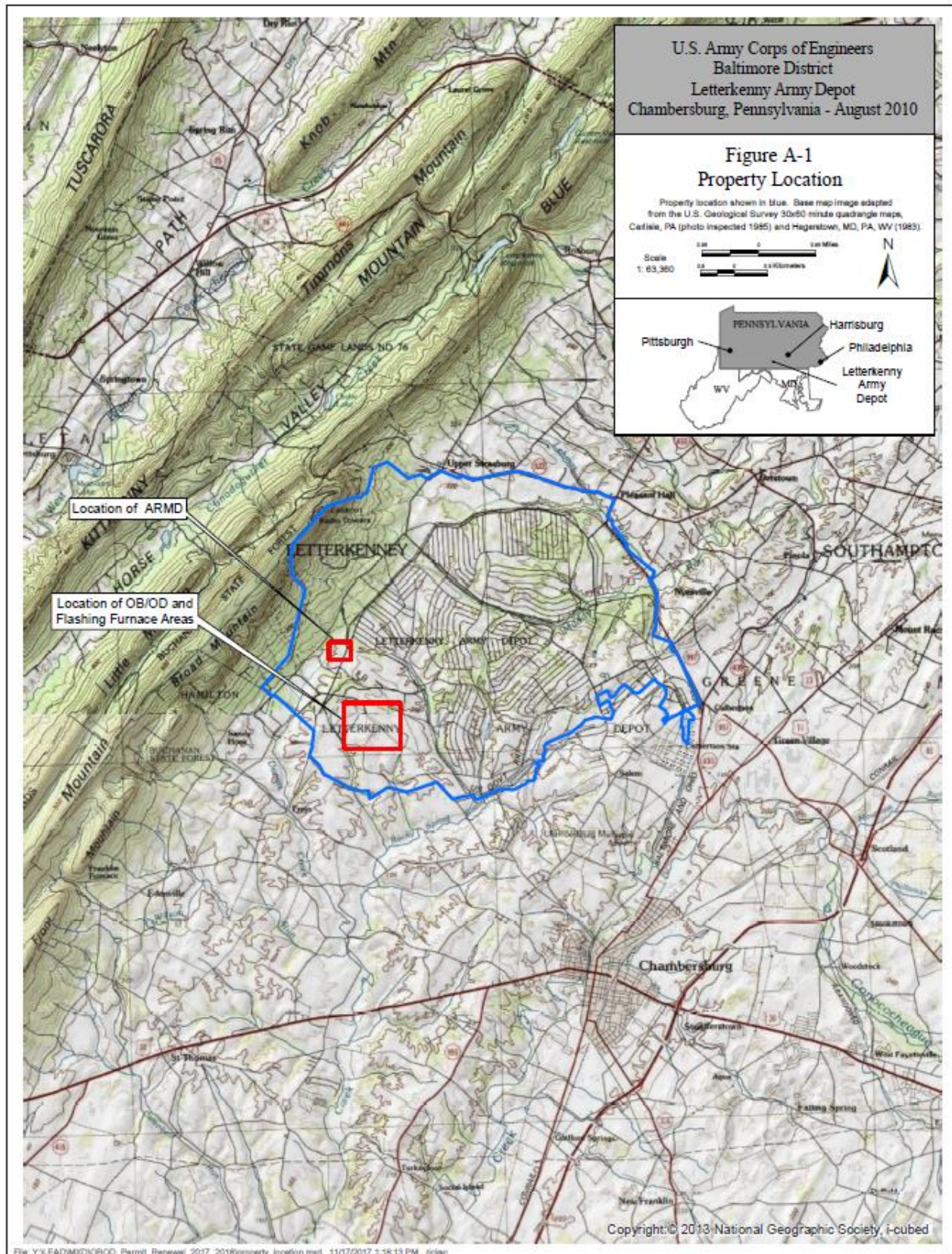


(Item 3 listed in the 1/4/2018 email. Revised Site plan with additional detail.)



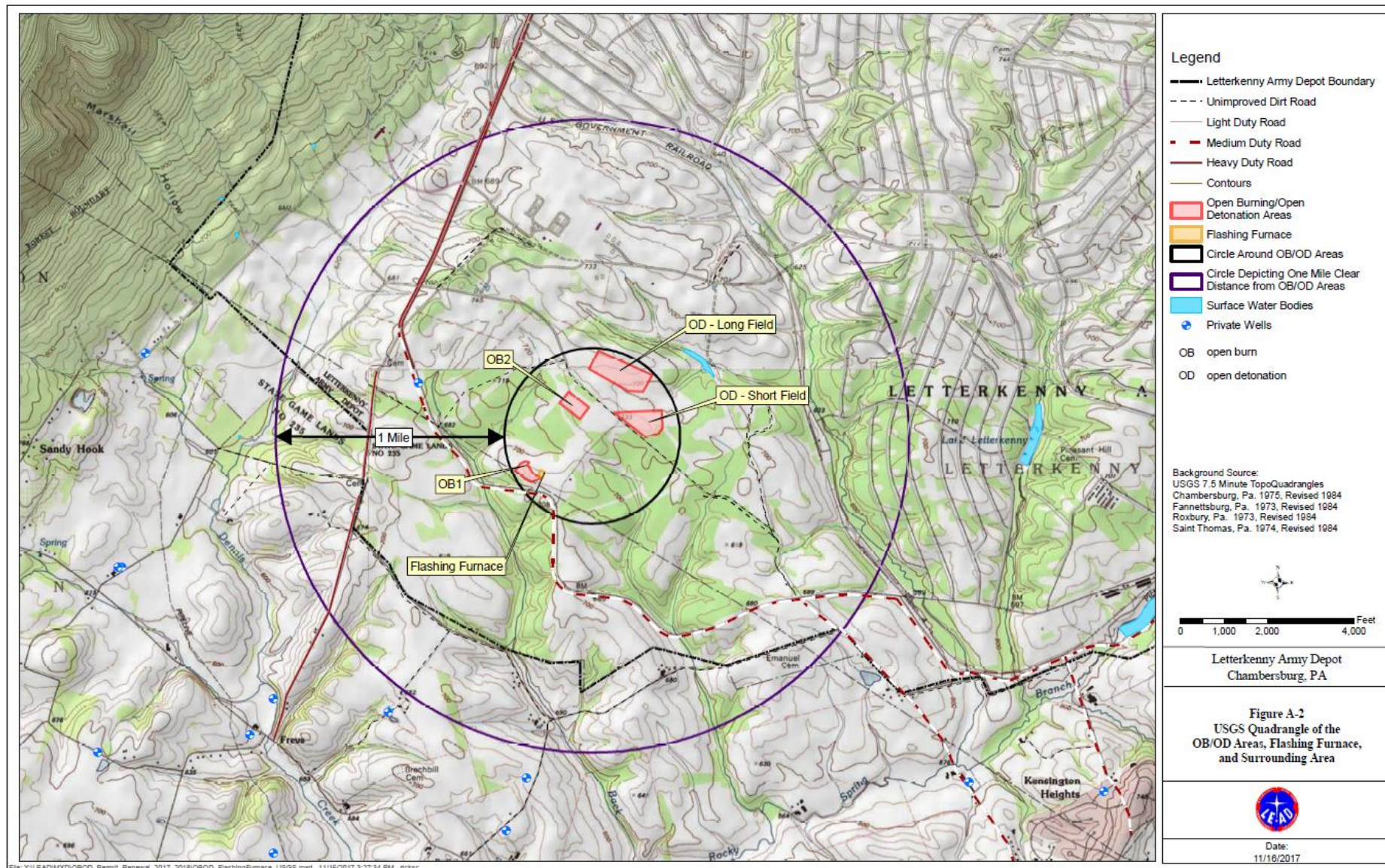


(Item 4 listed in the 1/4/2018 email. Topographic map of the entire Letterkenny property.)



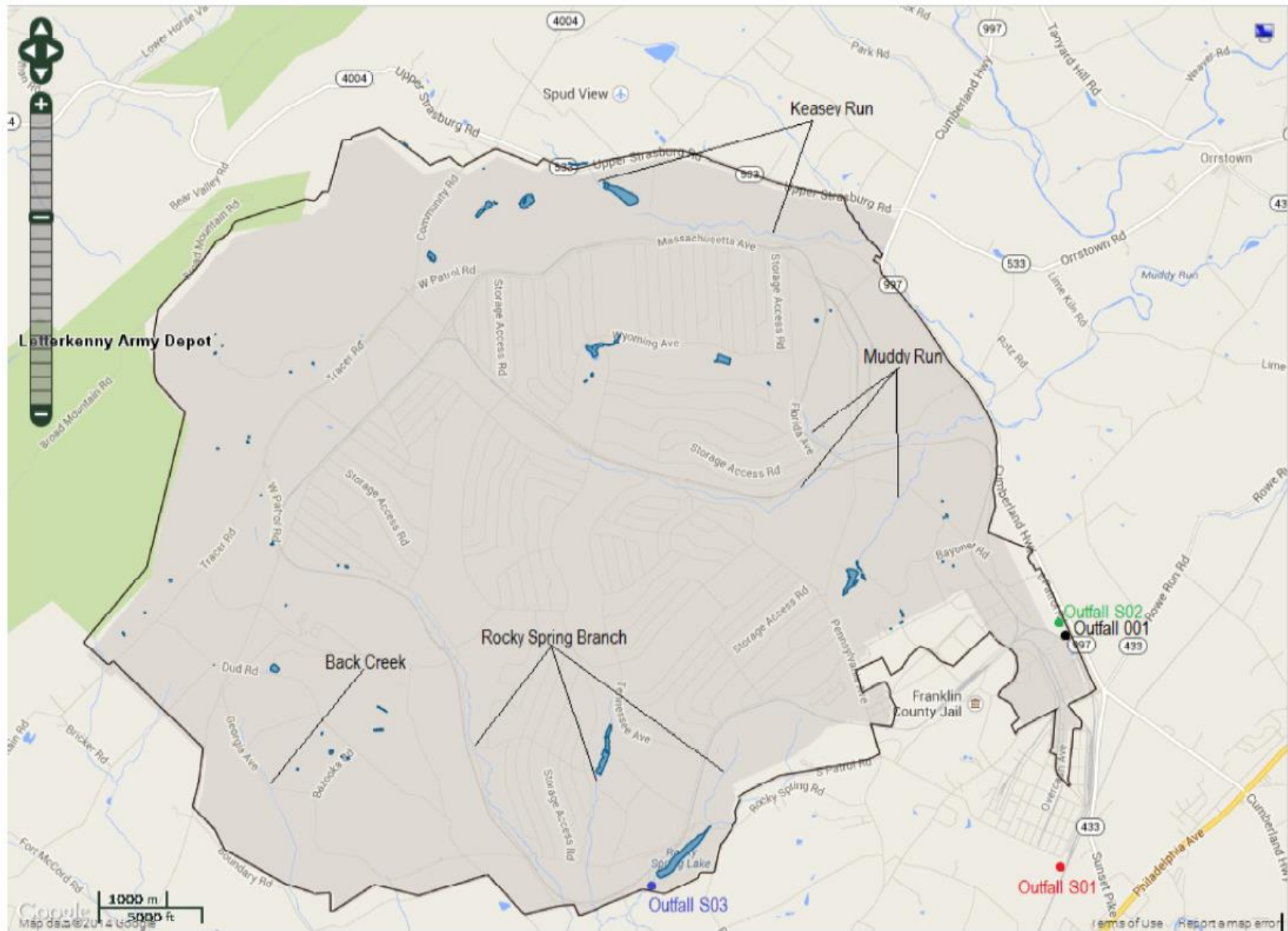


(Item 4 listed in the 1/4/2018 email. Topographic map showing the OB/OD grounds.)





(Item 4 listed in the 1/4/2018 email. Location of the other stormwater outfalls)



## **Attachment C**

1/16/2018 PADEP email. Additional Information Request.

**Fruchtl, Brenda**

---

**From:** Fruchtl, Brenda  
**Sent:** Tuesday, January 16, 2018 1:48 PM  
**To:** 'Kendle, Erin R CIV (US)'  
**Subject:** RE: [Non-DoD Source] NPDES Permit No PA0246891. Letterkenny Army Depot OB/OD Grounds. \*\*ADDITIONAL INFORMATION REQUEST\*\* (UNCLASSIFIED)

Erin,

Thank you for the information you provided. I was able to review it more closely today. It is sufficient to end the completeness review and move onto the technical review.

The following items aren't needed immediately, but would be helpful for when I start the technical review:

1. On Figure A-4: Open Burning and Open Detonation Areas, I have the following requests / questions:
  - a. Please locate and label Outfalls 006 and 007.
  - b. Please show either on that site plan or another site plan how the stormwater the flow of the stormwater from the different areas of the site to both Outfall 006 and 007?
  - c. The application indicates that the open burning and open detonation areas all go to Outfall 006. Does this include all the areas outlined in red on the site plan? If so, how does the stormwater get from Open Burning Ground 1 and 2 to Outfall 006?
  - d. The application indicates that the flashing furnace is the only area that drains to Outfall 007. Is this correct? If so, how does the drainage area reach 409,077 sq. feet as indicated in the application?
2. On Figure A-1: Property location, would it be possible to identify and label all the outfalls? This would help me better picture how everything fits together.
3. On Figure A-2: USGS Quadrangle of the OB/OD Areas, Flashing Furnace, and surrounding areas, would it also be possible to show outfall 006 and 007?

I don't need these items right away since it will be a while before I get around to the technical review portion of the permit application.

Thank you,  
Brenda

**Brenda Fruchtl, P.G.** | Licensed Professional Geologist  
Department of Environmental Protection  
Southcentral Regional Office Building  
909 Elmerton Avenue | Harrisburg, PA 17110  
Phone: 717.705.4812 | Fax: 717.705.4760  
[www.depweb.state.pa.us](http://www.depweb.state.pa.us)

-----Original Message-----

**From:** Kendle, Erin R CIV (US) [mailto:erin.r.kendle.civ@mail.mil]  
**Sent:** Thursday, January 04, 2018 12:13 PM  
**To:** Fruchtl, Brenda <bfruchtl@pa.gov>  
**Subject:** RE: [Non-DoD Source] NPDES Permit No PA0246891. Letterkenny Army Depot OB/OD Grounds. \*\*ADDITIONAL INFORMATION REQUEST\*\* (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

## **Attachment D**

5/22/2018 email response and attachments.

**Fruchtl, Brenda**

---

**From:** Fruchtl, Brenda  
**Sent:** Tuesday, January 16, 2018 1:48 PM  
**To:** 'Kendle, Erin R CIV (US)'  
**Subject:** RE: [Non-DoD Source] NPDES Permit No PA0246891. Letterkenny Army Depot OB/OD Grounds. \*\*ADDITIONAL INFORMATION REQUEST\*\* (UNCLASSIFIED)

Erin,

Thank you for the information you provided. I was able to review it more closely today. It is sufficient to end the completeness review and move onto the technical review.

The following items aren't needed immediately, but would be helpful for when I start the technical review:

1. On Figure A-4: Open Burning and Open Detonation Areas, I have the following requests / questions:
  - a. Please locate and label Outfalls 006 and 007.
  - b. Please show either on that site plan or another site plan how the stormwater the flow of the stormwater from the different areas of the site to both Outfall 006 and 007?
  - c. The application indicates that the open burning and open detonation areas all go to Outfall 006. Does this include all the areas outlined in red on the site plan? If so, how does the stormwater get from Open Burning Ground 1 and 2 to Outfall 006?
  - d. The application indicates that the flashing furnace is the only area that drains to Outfall 007. Is this correct? If so, how does the drainage area reach 409,077 sq. feet as indicated in the application?
2. On Figure A-1: Property location, would it be possible to identify and label all the outfalls? This would help me better picture how everything fits together.
3. On Figure A-2: USGS Quadrangle of the OB/OD Areas, Flashing Furnace, and surrounding areas, would it also be possible to show outfall 006 and 007?

I don't need these items right away since it will be a while before I get around to the technical review portion of the permit application.

Thank you,  
Brenda

**Brenda Fruchtl, P.G.** | Licensed Professional Geologist  
Department of Environmental Protection  
Southcentral Regional Office Building  
909 Elmerton Avenue | Harrisburg, PA 17110  
Phone: 717.705.4812 | Fax: 717.705.4760  
[www.depweb.state.pa.us](http://www.depweb.state.pa.us)

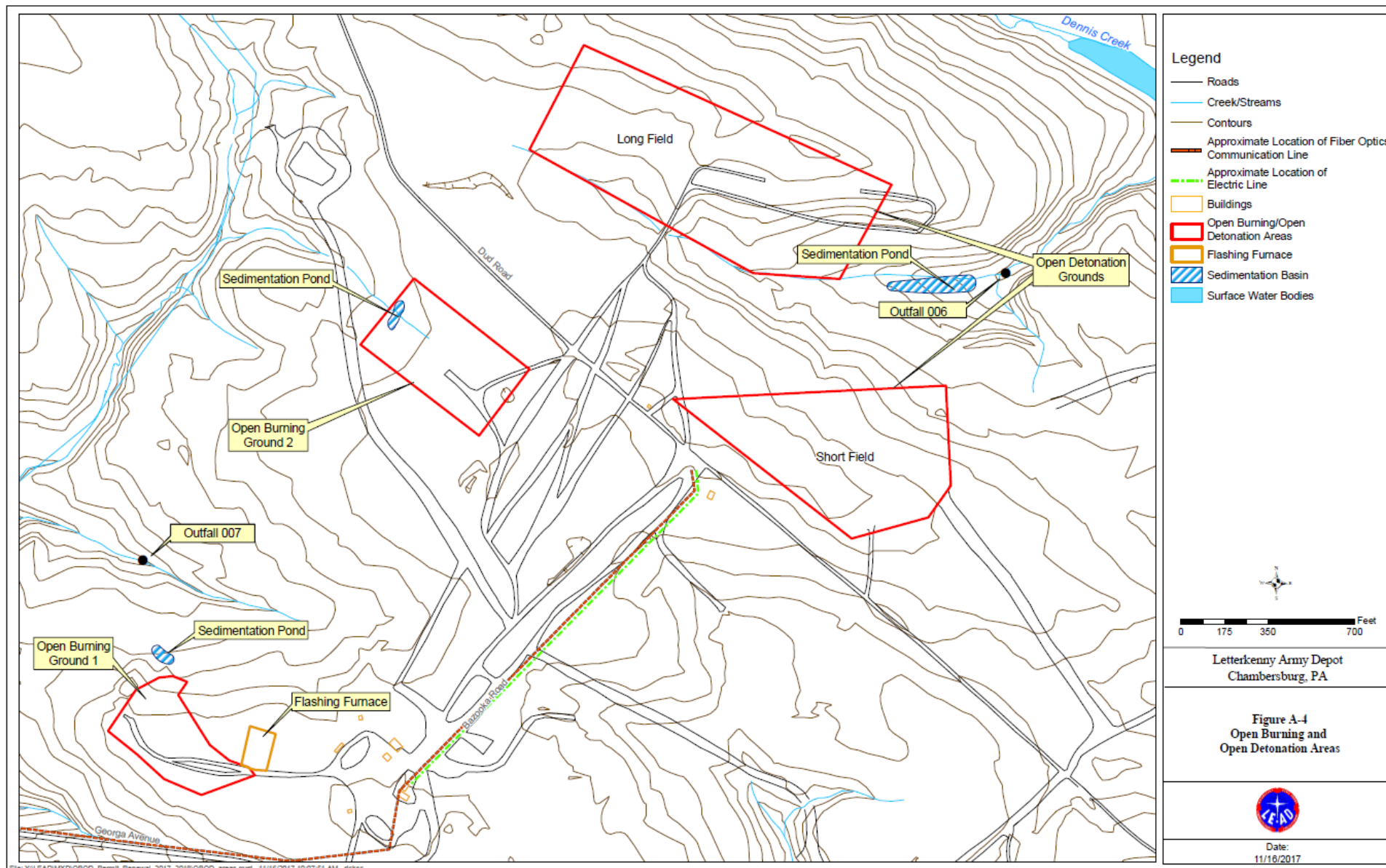
-----Original Message-----

**From:** Kendle, Erin R CIV (US) [mailto:erin.r.kendle.civ@mail.mil]  
**Sent:** Thursday, January 04, 2018 12:13 PM  
**To:** Fruchtl, Brenda <bfruchtl@pa.gov>  
**Subject:** RE: [Non-DoD Source] NPDES Permit No PA0246891. Letterkenny Army Depot OB/OD Grounds. \*\*ADDITIONAL INFORMATION REQUEST\*\* (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED



(Item 1.a. listed in the 5/22/2018 email. Revised Site plan showing outfall locations.)



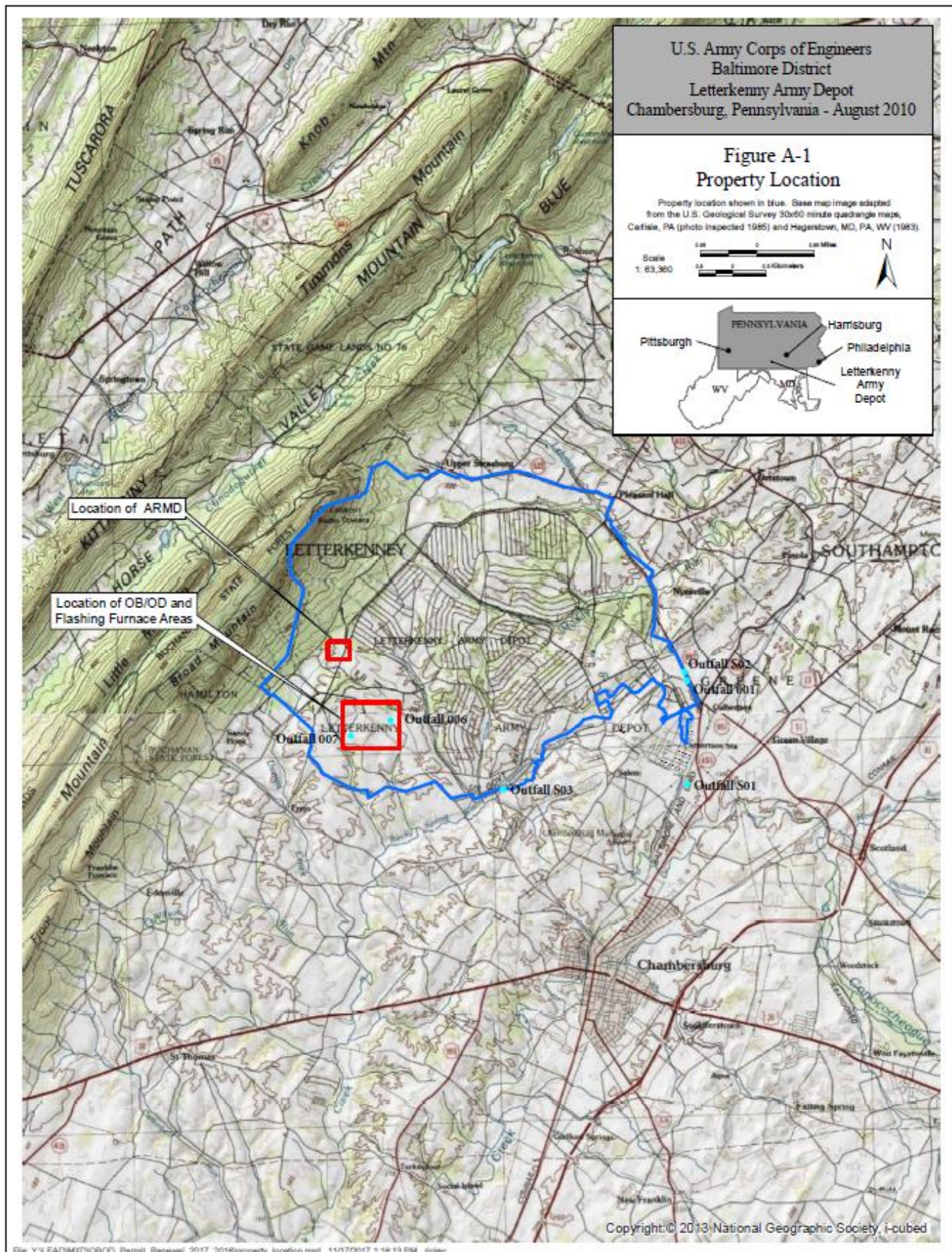


(Item 1.b. listed in the 5/22/2018 email. Direction of stormwater flow at the OB/OD grounds.)



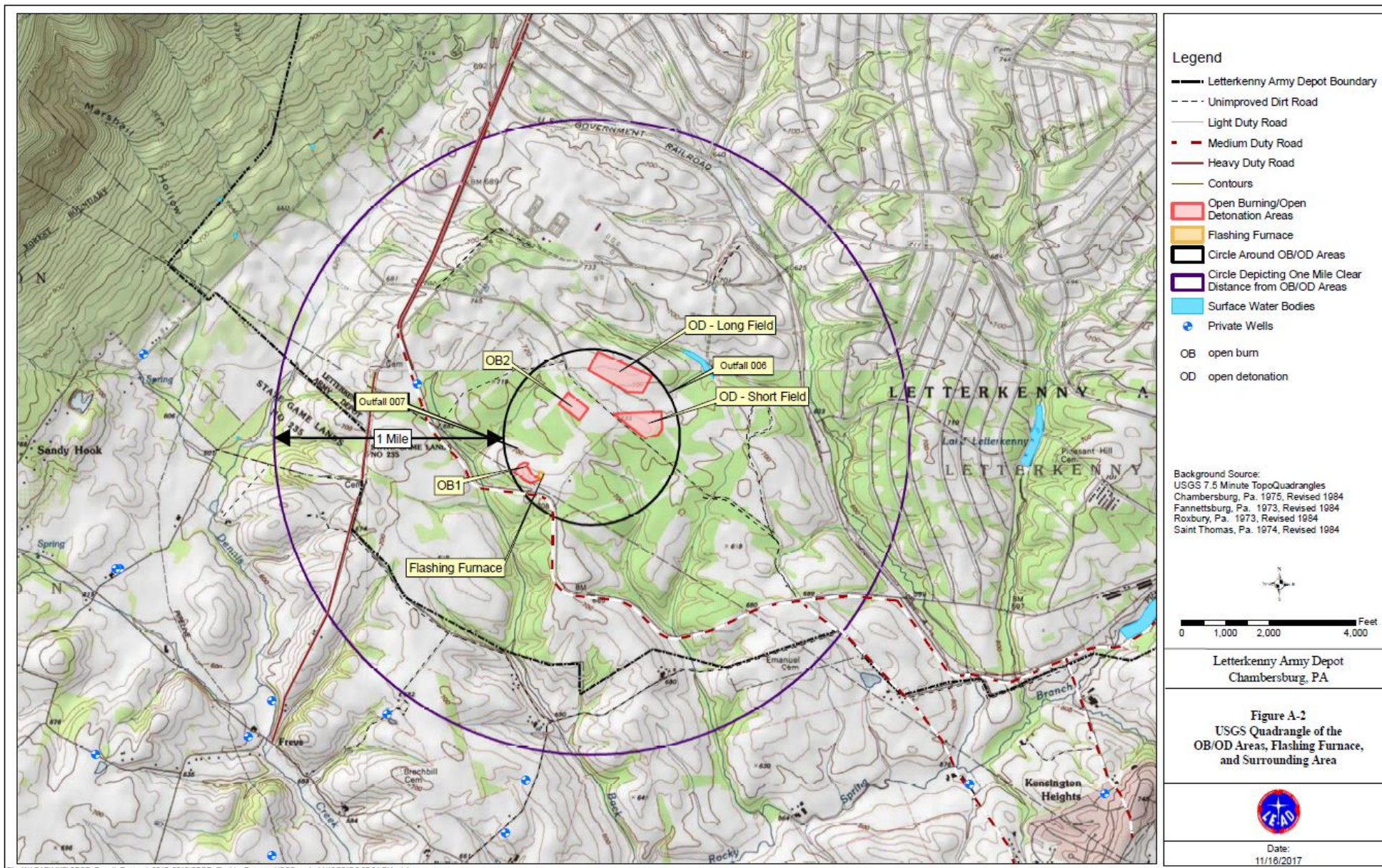


(Item 2. listed in the 5/22/2018 email. Topographic map of the entire Letterkenny property with Outfalls.)





(Item 3. listed in the 5/22/2018 email. Topographic map showing the OB/OD grounds with Outfalls.)



## Attachment E

### April 2018 emails regarding location of outfalls.

#### Fruchtl, Brenda

---

**From:** Wriglesworth, Sarah  
**Sent:** Thursday, April 18, 2019 8:07 AM  
**To:** Kendle, Erin R CIV (US)  
**Cc:** Fruchtl, Brenda; Arwood, Scott; Landis, Victor  
**Subject:** RE: OBOD Permit Application (UNCLASSIFIED)

Thank you,

Erin Kendle  
Letterkenny Army Depot  
Environmental Mgmt. Div.  
(717)267-5595

Good morning Erin,

I did report back to our permitting staff regarding the OB/OD outfalls. My initial impression was that there may need to be 3 outfall locations to accurately capture the 3 distinct areas covered by your stormwater permit; OB1, OB2, and the long and short fields. I believe we are waiting on some feedback from EPA prior to moving forward with the stormwater permit renewal, however. After we receive that feedback we will reach out if we need more information.

CLASSIFICATION: UNCLASSIFIED

Thanks for following up on this. If any other questions come up, please don't hesitate to contact me.

Sarah

Sarah Wriglesworth | Water Quality Specialist Supervisor Department of Environmental Protection | Clean Water  
Program Southcentral Regional Office  
909 Elmerton Avenue | Harrisburg, PA 17110  
Phone: 717.705.4787 | Fax: 717.705.4760  
Emergency Response: 866.825.0208  
[www.depweb.pa.gov](http://www.depweb.pa.gov)

PRIVILEGED AND CONFIDENTIAL COMMUNICATION The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.

-----Original Message-----

**From:** Kendle, Erin R CIV (US) <[erin.r.kendle.civ@mail.mil](mailto:erin.r.kendle.civ@mail.mil)>  
**Sent:** Wednesday, April 17, 2019 8:29 AM  
**To:** Wriglesworth, Sarah <[swrigleswo@pa.gov](mailto:swrigleswo@pa.gov)>  
**Subject:** OBOD Permit Application (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Good morning Sarah,

I was wondering if you had any time to think about where we should locate the new outfall at the OB/OD grounds. If we put the proposed 007 outfall right at the flashing furnace/OB1 area, it will not capture the runoff from the OB2 area. If we would be allowed to locate the 007 outfall further downstream, however, we could capture the whole area in one location.

Let me know if there is any additional information you need from us.



## Attachment F

### July 2020 emails regarding status of permit renewal and Outfall 007.

#### **Fruchtl, Brenda**

**From:** Fruchtl, Brenda  
**Sent:** Friday, July 24, 2020 10:06 AM  
**To:** Moore, Robert L CIV USARMY USAMC (USA)  
**Cc:** Anwood, Scott; Rakowsky, Jacob  
**Subject:** RE: NPDES Permit PA0246891 (UNCLASSIFIED). Letterkenny Army Depot. OB/OD Grounds. Individual SW Permit

Good Morning,

The Individual Industrial Stormwater permit renewal for NPDES Permit PA0246891 for Letterkenny Army Depot - OB/OD Grounds, has not been renewed yet.  
The second discharge point (Outfall 007) will not officially be added to the permit until the renewal is issued.

When I get to the technical review, I will let you know if we have any technical questions or need additional information.

In order to prevent the further spread of COVID-19, all DEP offices will remain closed until restrictions are lifted. In the meantime, I will be working remotely to continue the mission of the Pennsylvania Department of Environmental Protection and frequently retrieving emails. Thank you for your patience.

Brenda Fruchtl, P.G. | Licensed Professional Geologist Department of Environmental Protection | Clean Water Program  
Southcentral Regional Office Building  
909 Elmerton Avenue | Harrisburg, PA 17110  
Phone: 717.705.4812 | Fax: 717.705.4760  
www.dep.pa.gov

24-hour toll free Emergency Response number for SCRO: 1-800-541-2050

-----Original Message-----

**From:** Moore, Robert L CIV USARMY USAMC (USA) <robert.l.moore26.civ@mail.mil>  
**Sent:** Friday, July 24, 2020 7:51 AM  
**To:** Fruchtl, Brenda <bfruchtl@pa.gov>  
**Subject:** FW: NPDES Permit PA0246891 (UNCLASSIFIED)

-----Original Message-----

**From:** Moore, Robert L CIV USARMY USAMC (USA)  
**Sent:** Thursday, February 27, 2020 1:08 PM  
**To:** 'bfruchtl@pa.gov' <bfruchtl@pa.gov>  
**Subject:** NPDES Permit PA0246891 (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

I am the new NPDES compliance person here at Letterkenny Army Depot. I'm trying to fill in some information gaps I have identified. For NPDES Permit PA0246891, I have an expiration date of April 30, 2018. I know our facility submitted an application for a permit renewal. As part of the renewal we included a second discharge point (007) which I see is

listed on the PADEP GIS search tool. Has this permit been officially renewed? If so, can you provide a copy? Thank you for your assistance.

Robert Moore  
Physical Scientist  
Environmental Management Division  
Directorate of Public Works  
Letterkenny Army Depot  
Office: 717-267-5595

CLASSIFICATION: UNCLASSIFIED

## Attachment G

Inspection Report for 6/11/2021 PADEP site inspection.

3800-FM-BCW0528A 3/2018



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF CLEAN WATER

### INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

NPDES / WQM Permit No. PA0246891	Mo/Day/Year 06/11/2021	Entry Time 0850	Exit Time 1145	Inspection Type Select	eFACTS Inspection ID 3208094
Facility Name: Letterkenny Army Depot – Open Burning / Open Detonation Grounds			Permittee Name: Letterkenny Army Depot		
Physical Location Address/Directions: 1 Overcash Avenue; AMLD-EN, Bldg 14 Chambersburg, PA 17201-4150					
Permittee Address: 1 Overcash Avenue; AMLD-EN, Bldg 14 Chambersburg, PA 17201-4150			Permit Expiration Date: Select Submittal Due Date: In Renewal		
Municipality: Letterkenny Township		County: Franklin		Type(s) of IW Discharge(s):	
Responsible Official: Randall Quinn Title:			Facility Representative: Dave Hockenberry Title:		
Business Phone:			Business Phone: 717-267-5159		
Cell Phone:			Cell Phone:		
Email:			Email: David.h.hockenberry.civ@mail.mil		
24-Hour Emergency Contact Person / Phone / Email:					
<b>VIOLATIONS*:</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> None Identified During Inspection <input type="checkbox"/> Pending Results of Sample Analysis					
<div style="text-align: right;"> <input type="checkbox"/> continued on page B         </div>					
<b>Recommendations/Comments:</b> <ol style="list-style-type: none"> <li>1. Recommend investigating and implementing a plan with BMPs to minimize erosion from stormwater and soil entering the sedimentation ponds.</li> <li>2. Recommend investigating a potential stormwater outfall to capture flow from the sedimentation pond at open burning grounds 2.</li> <li>3. Recommend submitting an updated NPDES permit application that shows the location of active/proposed outfalls for all areas that are impacted by stormwater.</li> </ol>					
Person Interviewed: Dave Hockenberry		Date: 6/11/2021		Inspector: Brandon Bettinger	
Signature: Sent electronically		Phone No.: 7172675159		Signature: <i>Brandon Bettinger</i>	
Title:		Title: Water Quality Specialist			
Email: David.h.hockenberry.civ@mail.mil		Email: bbettinger@pa.gov			
<small>This document is official notification that a representative of the Department of Environmental Protection inspected the above facility. The findings of this inspection are shown above and on any attached pages. *Any violations which were noted during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses of the discharge and/or review of Department records.</small>					

3800-FM-BCW0528S 3/2018



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF CLEAN WATER

## INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

### Comments

A compliance evaluation inspection was conducted at 0850 hours by the Pennsylvania Department of Environmental Protection (Department). In attendance for the inspection was Brandon Bettinger (Water Quality Specialist). I was met by Mr. Sam Pelesky, Mr. Dave Hockenberry, Mr. Derrick Born, Mr. Steve Mayer, Mr. Jarred Doyle, and Mr. Greg Epstein. The facility and surrounding areas received over 2" of rain the previous evening into the morning hours. Rain persisted throughout the inspection.

Letterkenny Army Depot's open burning/open detonation grounds consist of specialized areas designated to safely dispose of various types of unexploded ordinance, small arms ammunition, propellants, and refuse from detonations. The open burning grounds consist of two areas. Open Burning Ground 1 consists of a flashing furnace on a concrete pad (Photo #1), staging area for small arms ammunition stored in sealed drums, 2 burn cages, and a staging area for burn cage material (Photo #2). The flashing furnace is exposed on the concrete pad and is used as part of the recycling/disposal process of small arms ammunition. Mr. Epstein stated the facility is currently exploring options for providing a covering for the flashing furnace. The facility's burn cages aid in the cleaning and disposal of pieces of exploded ordinance and wooden storage containers. Ash and refuse from the burn cages are loaded into a roll-off dumpster and removed from the site. Open burning ground 2 consists of burn pans on a concrete pad. The burn pans are used to dispose of expired bags of propellant. Each burn pan is covered when not in use. Ash and refuse are removed from the concrete pad after burning is complete. The facility's open detonation grounds consist of a long field and short field. The two fields are used for the detonation of unexploded ordinance. Explosives are buried under ground prior to detonation.

The facility currently has one permitted stormwater outfall. Outfall 006 receives flow from the open detonation grounds, consisting of the long field and the short field. Flow travels downslope to a sedimentation basin (Photo #3) before proceeding through the outfall to Louisiana Run. During the inspection, the sedimentation basin contained cloudy water. The concrete outfall structure contained a metal grate that was partially blocked by debris (Photo #4). Debris and sediment were present on the rocks at the top edge of the sedimentation basin (Photo #5). An earthen berm is present on the east side of the basin to prevent stormwater runoff in an overflow event. The berm contains an overflow pipe that conveys flow to a grass/rock lined channel before proceeding to Louisiana Run. Solids from the open detonation ground sedimentation basin are removed annually and placed on the open detonation fields.

Open burning grounds 1 has a proposed stormwater outfall location which we would be named, Outfall 007. Proposed Outfall 007 would receive flow from the burn cages and the flashing furnace. Sampling at this outfall would capture stormwater from the burn cages and the flashing furnace that is conveyed downslope and eventually reaches the tributary of Back Creek. Currently, burn cage runoff is conveyed to a small sedimentation pond (Photo #6). The sedimentation pond does not contain any BMPs and receives sediment laden runoff. The area surrounding the pond shows signs of erosion and it appears that the pond would overflow during high rainfall events.

Stormwater from open burning grounds 2 is conveyed downslope over the concrete pad and into a small sedimentation pond before continuing to the UNT (Photo #7). The downslope side of the basin contains a stone embankment. During the inspection, there was approximately two feet of freeboard from the water to the top of the stone embankment. It was indicated that the sedimentation pond overflows during high rainfall events. Discharge from the sedimentation basin is not currently captured by the current outfall 006 or the proposed outfall 007. The Department requests that an outfall location be proposed in this area to capture flow from the open burning grounds 2 sedimentation pond.

The facility employs various BMPs to minimize pollution events. This includes berms for runoff conveyance and containment, cleaning burning grounds after use, ash removal from burn cages to roll-off dumpster, and sedimentation basins.

The Department requests that the facility updates and submits the NPDES permit renewal application to show the location of all active and proposed stormwater outfall locations. For questions regarding the permit renewal application, please contact Brenda Fruchtl (Licensed Professional Geologist) at [bfruchtl@pa.gov](mailto:bfruchtl@pa.gov) or 717-705-4812.

Records are maintained on site and a review of paperwork was conducted. This included DMRs and annual reports. The PPC plan was reviewed and met all requirements listed in Part C of the Permit.



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF CLEAN WATER

## INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

### Photographs



Photo #1  
Flashing Furnace  
Photo Taken By: Brandon Bettinger on 6/11/2021



Photo #2  
Flashing Furnace Loading Area  
Photo Taken By: Brandon Bettinger on 6/11/2021



3800-FM-BCW0528S 3/2018



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF CLEAN WATER

INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

Photographs



Photo #3  
OD Grounds Sedimentation Pond  
Photo Taken By: Brandon Bettinger on 6/11/2021



Photo #4  
Partially Clogged Outfall Grate  
Photo Taken By: Brandon Bettinger on 6/11/2021



Photo #5  
Sediment Laden Rocks  
Photo Taken By: Brandon Bettinger on 6/11/2021



Photo #6  
OB 1 Sedimentation Pond  
Photo Taken By: Brandon Bettinger on 6/11/2021



3800-FM-BCW0528S 3/2018



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF CLEAN WATER

## INDUSTRIAL WASTE COMPLIANCE INSPECTION REPORT

### Photographs



Photo #7  
OB 2 Sedimentation Pond  
Photo Taken By: Brandon Bettinger on 6/11/2021

## Attachment H

2/28/2022 PADEP email. Technical information request.

Fruchtl, Brenda

**From:** Fruchtl, Brenda  
**Sent:** Monday, February 28, 2022 2:01 PM  
**To:** Moore, Robert L CIV USARMY USAMC (USA); david.h.hockenberry.civ@mail.mil  
**Cc:** Arwood, Scott; Wriglesworth, Sarah; Bettinger, Brandon  
**Subject:** LetterkennyArmyDepotOBODGrounds\_PA0246891\_CEL06112021.pdf; RE: [Non-DoD Source] NPDES Permit No PA0246891. Letterkenny Army Depot OB/OD Grounds. Individual SW Permit \*\*TECHNICAL REVIEW QUESTIONS. RESPONSE REQUESTED\*\*  
**Attachments:** LetterkennyArmyDepotOBODGrounds\_PA0246891\_CEL06112021.pdf; RE: [Non-DoD Source] NPDES Permit No PA0246891. Letterkenny Army Depot OB/OD Grounds. \*\*ADDITIONAL INFORMATION REQUEST\*\* (UNCLASSIFIED); A4.pdf

Tracking:	Recipient	Delivery	Read
	Moore, Robert L CIV USARMY USAMC (USA)		
	david.h.hockenberry.civ@mail.mil		
	Arwood, Scott	Delivered: 2/28/2022 2:02 PM	
	Wriglesworth, Sarah	Delivered: 2/28/2022 2:02 PM	Read: 2/28/2022 2:08 PM
	Bettinger, Brandon	Delivered: 2/28/2022 2:02 PM	

Good Afternoon

I have started the technical review for NPDES Permit No PA0246891 renewal application for Letterkenny Army Depot OB/OD Grounds received November 1, 2017.

Before I proceed, the following questions and concerns need addressed:

- On June 21, 2021, an inspection report (attached) was sent to David Hockenberry as a follow up to the June 11, 2021 inspection conducted by Brandon Bettinger, DEP-SCRO.
  - Provide an update and/or responses to the following recommendations (outlined in the June 21, 2021 inspection report):
    - Recommend investigating and implementing a plan with BMPs to minimize erosion from stormwater and soil entering the sedimentation ponds.
    - Recommend investigating a potential stormwater outfall to capture flow from the sedimentation pond at open burning grounds 2.
    - Recommend submitting an updated NPDES permit application that shows the location of active/proposed outfalls for all areas that are impacted by stormwater.
- On January 16, 2018 when the renewal was first received, I had also asked some questions and received responses on 5/22/2018 from Erin Kendle along with some revised maps (see attached email). However, some of my questions were not answered completely.
  - Provide responses to the following questions (initially asked January 16, 2018)
    - If the stormwater from Open Burning (OB) Ground 1 and 2 does not flow to Outfall 006, where does the stormwater flow?
    - It appears there should be another outfall identified and labeled for the discharge from the sedimentation pond located at OB Ground 2 shown on Figure A-4 (attached). Please elaborate and provide updated maps and application pages as necessary.
    - If the flashing furnace is the only area that drains to Outfall 007, how does the drainage area for Outfall 007 reach 409,077 sq. feet as indicated in the application?

- Based on responses received on 5/22/2018, it appears that Outfall 006 receives stormwater from the two Open Detonation (OD) Grounds (Short field and Long field); and Outfall 007 receives stormwater from the Flashing Furnace and possibly Open Burning Ground 1. I cannot decipher where the stormwater from Open Burning Ground 2 flows.
  - Provide a revised Figure A4 (or a new figure) that clearly outlines the drainage areas for Outfall 006 and Outfall 007, so it is easier to see which areas drain to each outfall. Include any necessary additional outfalls to ensure the entire area is capture by an identified outfall.
- Since the application was submitted on November 1, 2017, have there been any major changes to the application, such as contact information, discharge areas, number of outfalls, additional sampling, additional BMPs installed, etc.
  - Provide updated pages as necessary to document any changes to the permit application (received on November 1, 2017) including the identification of an additional outfall if deemed appropriate.

Please acknowledge receipt of this email and questions. And provide a timeline for providing responses.

Feel free to contact me if you have any questions for me or would like to discuss further.

Thank you

**Brenda Fruchtl, P.G.** | Licensed Professional Geologist  
Department of Environmental Protection | Clean Water Program  
Southcentral Regional Office Building  
909 Elmerton Avenue | Harrisburg, PA 17110  
Phone: 717.705.4812 | Fax: 717.705.4760  
[www.dep.pa.gov](http://www.dep.pa.gov)

24-hour toll free Emergency Response number for SCRO: 1-800-541-2050

## Attachment I

3/1/2022 email acknowledgement and updated contact information.

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From: Hockenberry, David H CIV USARMY USAMC (USA) <[david.h.hockenberry.civ@army.mil](mailto:david.h.hockenberry.civ@army.mil)>  
Sent: Tuesday, March 1, 2022 8:13 AM  
To: Fruchtl, Brenda <[bfruchtl@pa.gov](mailto:bfruchtl@pa.gov)>  
Cc: Fisher, Jon E CIV USARMY USAMC (USA) <[jon.e.fisher3.civ@army.mil](mailto:jon.e.fisher3.civ@army.mil)>; Warnock, Douglas A CIV USARMY USAMC (USA) <[douglas.a.warnock.civ@army.mil](mailto:douglas.a.warnock.civ@army.mil)>; Bettinger, Brandon <[bbettinger@pa.gov](mailto:bbettinger@pa.gov)>  
Subject: [External] RE: [URL Verdict: Unknown][Non-DoD Source] Questions. NPDES Permit PA0246891 (UNCLASSIFIED) renewal application. Letterkenny Army Depot. OB/OD Grounds. Individual SW Permit \*\*TECHNICAL REVIEW QUESTIONS. RESPONSE REQUESTED\*\*

*ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to [CWOPA\\_SPAM@pa.gov](mailto:CWOPA_SPAM@pa.gov) < Caution-mailto:CWOPA\_SPAM@pa.gov > .*

Brenda,

Good morning. I want to acknowledge receipt of your email from yesterday. I am going to be forwarding this email over to the Letterkenny Environmental Management Division so they will be able to answer all your questions. I noticed in this email, and an earlier email, that you have sent emails to Mr. Robert Moore which unfortunately is no longer employed at Letterkenny Army Depot. Erin Kendle which originally worked on and sent the application to the department also no longer is employed at Letterkenny Army Depot, both Robert and Erin operated out of the Letterkenny Environmental Division.

You can address any further emails to the Chief of the Environmental Division to Mr. Douglas Warnock, (717) 267-5702 [ordouglas.a.warnock.civ@army.mil](mailto:ordouglas.a.warnock.civ@army.mil) < Caution-mailto:douglas.a.warnock.civ@army.mil > and Mr. Jon Fisher, (717) 267-5595 [orjon.e.fisher3.civ@army.mil](mailto:orjon.e.fisher3.civ@army.mil) < Caution-mailto:jon.e.fisher3.civ@army.mil >

I hope this helps aid you in your request for information, but if you have any further questions, please do not hesitate to contact me!!!

Have a Great Day!

Very Respectfully Submitted,

David H. Hockenberry  
Letterkenny I.W.T.P.  
(717) 267-5159

What we do when defeat stares us in the face is the real touchstone of character.

Orison Swett Marden

---

From: Fruchtl, Brenda <[bfruchtl@pa.gov](mailto:bfruchtl@pa.gov) < Caution-mailto:bfruchtl@pa.gov > >  
Sent: Monday, February 28, 2022 2:01 PM  
To: 'Moore, Robert L CIV USARMY USAMC (USA)' <[robert.l.moore26.civ@mail.mil](mailto:robert.l.moore26.civ@mail.mil) < Caution-mailto:robert.l.moore26.civ@mail.mil > >; david.h.hockenberry.civ@mail.mil < Caution-mailto:david.h.hockenberry.civ@mail.mil >

## Attachment J

4/14/2022 email response (to 2/28/2022 PADEP email) and attachments.

**Fruchtl, Brenda**

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**From:** Epstein, Gregory A CIV USARMY USAMC (USA) <gregory.a.epstein.civ@army.mil>  
**Sent:** Thursday, April 14, 2022 2:12 PM  
**To:** Fruchtl, Brenda  
**Cc:** Fisher, Jon E CIV USARMY USAMC (USA); Kindlin, Craig M CIV USARMY USAMC (USA)  
**Subject:** [External] FW: [URL Verdict: Unknown][Non-DoD Source] Questions. NPDES Permit PA0246891 (UNCLASSIFIED) renewal application. Letterkenny Army Depot. OB/OD Grounds. Individual SW Permit \*\*TECHNICAL REVIEW QUESTIONS. RESPONSE REQUESTED\*\*  
**Attachments:** Subpart X Permit Conditions Requiring Sediment Traps.pdf; OBOD Drainage - FIGURE A-4 2022\_0411.pdf; Pages 2-5  
\_NPDES\_APPLICATION\_FOR\_INDIVIDUAL\_PERMIT\_TO\_DISCHARGE\_INDUSTRIAL\_STORMWATER.pdf  
**Importance:** High  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

*ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to [CWOPA\\_SPAM@pa.gov](mailto:CWOPA_SPAM@pa.gov).*

Hi Brenda,

Robert Moore no longer works at Letterkenny Army Depot. Until we get a permanent employee to oversee the wastewater program, please send all correspondence to everyone on this e-mail.

See our response to your recommendations and questions below. Also, see revised pages of the 2017 permit application, updated Figure A-4 showing the drainage divide and drainage areas for Outfall 006 and proposed Outfall 007, and the Subpart X Permit Conditions requiring sediment traps.

If you have any questions, please let me know. Thanks.

Greg Epstein  
Environmental Management Division  
Letterkenny Army Depot  
717-267-8483

**From:** Fruchtl, Brenda <[bfruchtl@pa.gov](mailto:bfruchtl@pa.gov)>  
**Sent:** Monday, February 28, 2022 2:01 PM  
**To:** 'Moore, Robert L CIV USARMY USAMC (USA)' <[robert.l.moore26.civ@mail.mil](mailto:robert.l.moore26.civ@mail.mil)>; [david.h.hockenberry.civ@mail.mil](mailto:david.h.hockenberry.civ@mail.mil)  
**Cc:** Arwood, Scott <[sarwood@pa.gov](mailto:sarwood@pa.gov)>; Wriglesworth, Sarah <[swrigleswo@pa.gov](mailto:swrigleswo@pa.gov)>; Bettinger, Brandon <[bbettinger@pa.gov](mailto:bbettinger@pa.gov)>  
**Subject:** [URL Verdict: Unknown][Non-DoD Source] Questions. NPDES Permit PA0246891 (UNCLASSIFIED) renewal application. Letterkenny Army Depot. OB/OD Grounds. Individual SW Permit \*\*TECHNICAL REVIEW QUESTIONS. RESPONSE REQUESTED\*\*



Good Afternoon

I have started the technical review for NPDES Permit No PA0246891 renewal application for Letterkenny Army Depot OB/OD Grounds received November 1, 2017.

**Before I proceed, the following questions and concerns need addressed:**

1. On June 21, 2021, an inspection report (attached) was sent to David Hockenberry as a follow up to the June 11, 2021 inspection conducted by Brandon Bettinger, DEP-SCRO.
  - a. **Provide an update and/or responses to the following recommendations (outlined in the June 21, 2021 inspection report):**

1. Recommend investigating and implementing a plan with BMPs to minimize erosion from stormwater and soil entering the sedimentation ponds.

The sediment ponds/traps and diversion dikes were originally installed to minimize erosion. The PA Department of Environmental Protection required the installation of the sediment ponds/traps as part of LEAD's Subpart X Permit. See attachment titled Subpart X Permit Conditions Requiring Sediment Traps.

2. On January 16, 2018 when the renewal was first received, I had also asked some questions and received responses on 5/22/2018 from Erin Kendle along with some revised maps (see attached email). However, some of my questions were not answered completely.

**a. Provide responses to the following questions (initially asked January 16, 2018)**

1. If the stormwater from Open Burning (OB) Ground 1 and 2 does not flow to Outfall 006, where does the stormwater flow?

The stormwater from OB Grounds 1 and 2 flows to a tributary of Back Creek.

2. It appears there should be another outfall identified and labeled for the discharge from the sedimentation pond located at OB Ground 2 shown on Figure A-4 (attached). Please elaborate and provide updated maps and application pages as necessary.

LEAD recommends a stormwater outfall that will capture flow from the sedimentation ponds at both Open Burning (OB) Grounds 1 and 2. See attachment titled OBOD Drainage – FIGURE A-4 that shows the location of the proposed outfall.

3. If the flashing furnace is the only area that drains to Outfall 007, how does the drainage area for Outfall 007 reach 409,077 sq. feet as indicated in the application?

The drainage area included the entire OB Ground 1 area, not just the flashing furnace area.

3. Based on responses received on 5/22/2018, it appears that Outfall 006 receives stormwater from the two Open Detonation (OD) Grounds (Short field and Long field); and Outfall 007 receives stormwater from the Flashing Furnace and possibly Open Burning Ground 1. I cannot decipher where the stormwater from Open Burning Ground 2 flows.

**a. Provide a revised Figure A4 (or a new figure) that clearly outlines the drainage areas for Outfall 006 and Outfall 007, so it is easier to see which areas drain to each outfall. Include any necessary additional outfalls to ensure the entire area is capture by an identified outfall.**

See attachment titled OBOD Drainage – Figure A-4, which outlines the drainage areas for Outfall 006 and Outfall 007.

4. Since the application was submitted on November 1, 2017, have there been any major changes to the application, such as contact information, discharge areas, number of outfalls, additional sampling, additional BMPs installed, etc.

3

- 
- a. Provide updated pages as necessary to document any changes to the permit application (received on November 1, 2017) including the identification of an additional outfall if deemed appropriate.

See updated pages to permit application.

**Please acknowledge receipt of this email and questions. And provide a timeline for providing responses.**

Feel free to contact me if you have any questions for me or would like to discuss further.

Thank you

**Brenda Fruchtl, P.G.** | Licensed Professional Geologist  
Department of Environmental Protection | Clean Water Program  
Southcentral Regional Office Building  
909 Elmerton Avenue | Harrisburg, PA 17110  
Phone: 717.705.4812 | Fax: 717.705.4760  
[Caution-www.dep.pa.gov](http://www.dep.pa.gov) < Caution-[http://www.dep.pa.gov/](http://www.dep.pa.gov) >

**24-hour toll free Emergency Response number for SCRO: 1-800-541-2050**

(Subpart X Permit Conditions requiring sediment trap in response to question 1.a.1. in PADEP 2/28/2022 email)

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PERMIT

FOR HAZARDOUS WASTE STORAGE, TREATMENT AND DISPOSAL

Permittee: Letterkenny Army Depot Permit Number: PA6213820503  
Facility: Letterkenny Army Depot

This permit is issued by the Commonwealth of Pennsylvania Department of Environmental Protection (hereafter called the Department) under authority of the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, Act 97, 35 P.S. Section 6018.101 *et seq.* (the Act), the Department's hazardous waste regulations and Federal hazardous waste regulations to Letterkenny Army Depot (hereafter called the Permittee), to operate a hazardous waste management facility located in Chambersburg, Pennsylvania, at latitude 40°00'05" North and longitude 77°37'25" West.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (Parts I - IV, consisting of pages 2 through 10 and Attachments 1 through 5) and the applicable regulations contained in 25 Pa. Code Chapters 260a - 270a and 40 CFR 260 - 270 as specified in the permit.

This permit is based on the assumption that the information submitted in the permit application dated December 2001 as modified by subsequent amendments received November 21, 2006, and July 16, 2008, (hereafter referred to as the application) is accurate and that the facility will be constructed and/or operated as specified in the application. Any inaccuracies found in this information may be grounds for the revocation or modification of this permit and potential enforcement action. The Permittee must inform the Department of any deviation from or changes in the information in the application, which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit is conditioned upon full compliance with all applicable provisions of the Act; the Department's regulations contained in 25 Pa. Code Chapters 260a - 270a; Federal regulations contained in 40 CFR Chapters 260 - 270; The Clean Streams Law, 35 P.S. 691.1 *et seq.*; the Air Pollution Control Act, 35 P.S. 4001 *et seq.*; the Dam Safety and Encroachments Act, 32 P.S. 693.1 *et seq.*; the Surface Mining Conservation and Reclamation Act, 52 P.S. 1396.1 *et seq.*; the Coal Refuse Disposal Control Act, 52 P.S. 30.51 *et seq.*; all other Pennsylvania statutes related to the protection of the environment; and all Pennsylvania statutes related to the protection of public health, safety, and welfare.

This permit is effective as of August 5, 2008, and shall remain in effect until August 5, 2018, unless revoked and reissued, or terminated in accordance with 25 Pa. Code 270a.41, 270a.42, 270a.43 and 40 CFR 270.41, 270.42, and 270.43, or continued.

  
\_\_\_\_\_  
FOR THE DEPARTMENT OF ENVIRONMENTAL PROTECTION

PART IV – PERMIT CONDITIONS

The Permittee is hereby authorized to treat energetic wastes in accordance with Parts I, II, and III of this permit, subject to the following permit conditions:

A. CONSTRUCTION ACTIVITIES

1. The Permittee shall install diversion dikes and a sediment trap down gradient of Open Burning Unit No. 1. The diversion dikes shall divert runoff to the sediment trap.
2. The Permittee shall install diversion dikes and a sediment trap down gradient of Open Burning Unit No. 2. The diversion dikes shall divert runoff to the sediment trap.

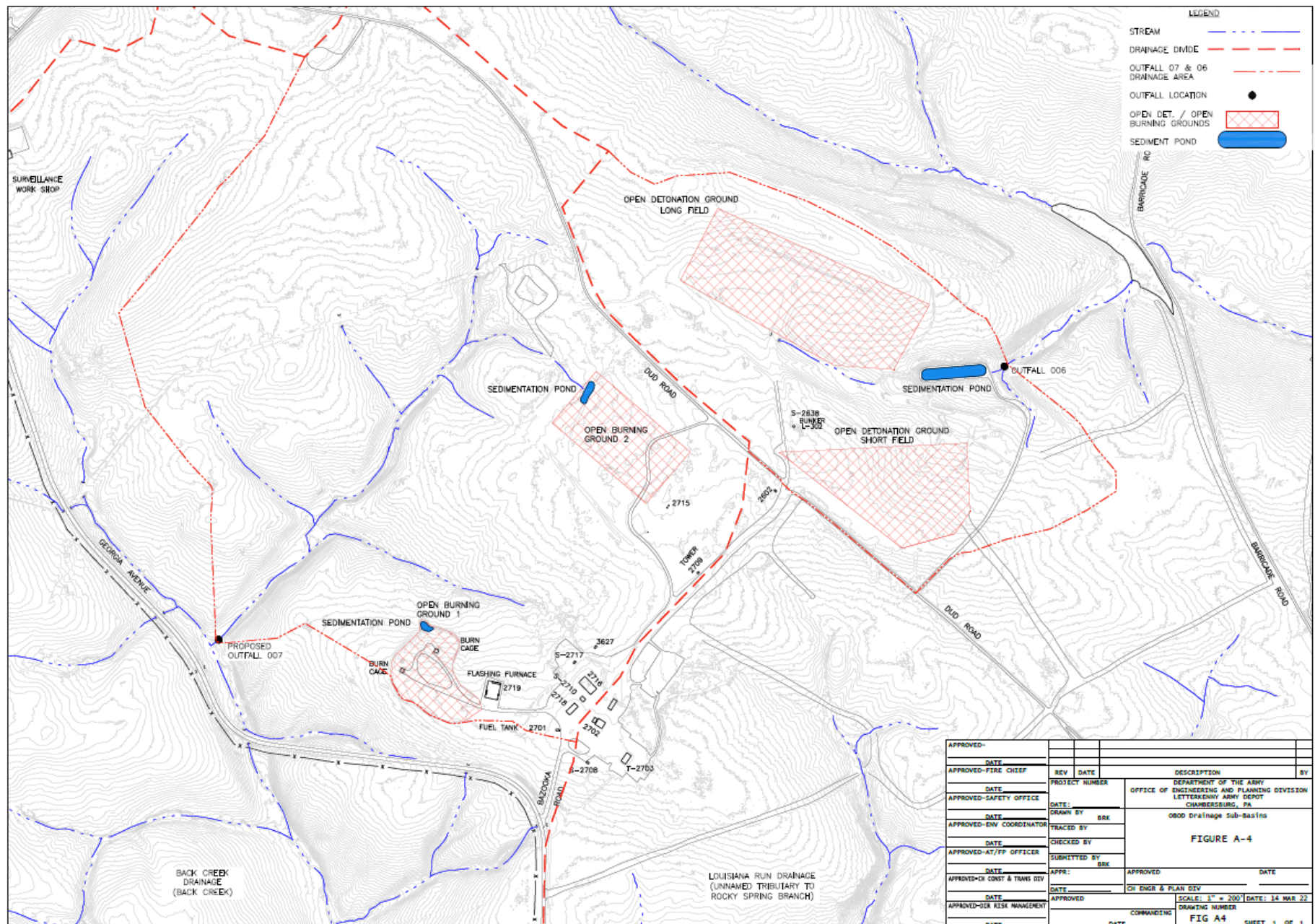
B. ENVIRONMENTAL SAMPLING

The Permittee shall prepare an Environmental Sampling Plan to address potential impacts to the open burning/open detonation (OB/OD) areas that may result from OB/OD activities. The Permittee shall submit the Environmental Sampling Plan to the Department for Department approval within 180 days of the issuance of this permit. Upon Department approval, the Permittee shall comply with the provisions of the Environmental Sampling Plan. The Environmental Sampling Plan shall specifically provide for the following:

1. Sediment Trap Sampling. The Permittee shall conduct sediment sampling in the sediment traps of Open Burning Unit No. 1 and Open Burning Unit No. 2, both of which are required for installation in permit condition IV.A above. This sampling shall be conducted no less than once per year.
2. Sedimentation Basin Sampling. The Permittee shall conduct sampling of the sedimentation basin (aka sediment pond) dredgings. This sampling shall be conducted no less than once per year.
3. Soil Sampling. The Permittee shall conduct soil sampling in the Open Detonation Area. This sampling shall be conducted subsequent to detonation operations, with at least one sample taken from a freshly fired detonation crater at a depth of no less than 10 feet below grade surface, and at least one sample taken at grade surface within 50 feet of the detonation operations after the regrading of the craters is completed. This sampling shall be conducted no less than once per year.
4. Surface Water Monitoring. The Permittee shall conduct surface water monitoring in the OB/OD areas. This monitoring shall be conducted subsequent to high rainfall events of no less than two (2) inches of rain per 12-hour period. This monitoring shall be conducted in the Back Creek Sub-Basin in the unnamed tributary downstream from Open Burning Unit No. 1 and Open Burning Unit No. 2, on the downstream side of Georgia Avenue. This monitoring shall also be conducted in the Rocky Spring Branch Sub-Basin in the effluent stream of the sediment pond and in the effluent stream of the old impoundment pond, downstream of Barricade Road. This monitoring shall be conducted no less than once per year.
5. Groundwater Monitoring. The Permittee shall conduct groundwater monitoring in the OB/OD areas. This monitoring shall be consistent with, and a continuation of, the groundwater monitoring that was conducted between June 2003 and March 2004 at the Department's request for the application, Attachment 6. This monitoring shall be conducted no less than once per year.
6. Sediment and Soil Analysis. The sediment and soil samples required in IV.B.1 through IV.B.3 above shall be analyzed for:
  - a. all parameters listed in Table 4 of Appendix A of 25 Pa Code § 250.1 *et seq.* (regarding the Department's Land Recycling Program);
  - b. the inorganic parameters of sulfate, chloride, fluoride, nitrate, and nitrite; and
  - c. the explosives parameters of nitrocellulose, nitroguanidine, nitroglycerine, perchlorate, 2,4-dinitrotoluene, 2-amino-4,6-dinitrotoluene, 4-amino-2,6-dinitrotoluene, tetryl, 1,3,5-trinitrobenzene, 2,4,6-trinitrotoluene, HMX, and RDX.



(Updated OBOD Drainage FIGURE A-4 in response to questions 1.a.3; 2.a.2; and 3.a. in PADEP 2/28/2022 email)





3800-PM-BCW0403b Rev. 6/2019  
Permit Application

FACILITY AND DISCHARGE INFORMATION					
1. Attach a site plan and topographic or aerial map with the facility and discharge or internal monitoring locations clearly identified (see instructions).					
2. Total area of site (sf): 13,870,463		% Pervious:	99.9	% Impervious:	0.1
3. Report the latitude and longitude of the facility below (see instructions).					
Latitude			Longitude		
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
39	59	48	-77	43	51
Horizontal Reference Datum: <input type="checkbox"/> NAD of 1927 <input type="checkbox"/> NAD of 1983 <input type="checkbox"/> WGS of 1984 <input checked="" type="checkbox"/> Unknown					
4. The applicant may optionally attach its PPC Plan or related plan to the application. This information may be useful to DEP in completing its review of the application. If the PPC Plan is not attached to the application, DEP may request submission of the Plan during the review. Electronic transmission of large PPC Plans is encouraged.					
Note for existing facilities: if there have been leaks or spills on-site within the past five years, report in the PPC Plan the cause of leaks or spills, the substance(s) released, measures taken to remediate the incident(s) and preventative measure(s) taken to reduce the possibility of future incidents.					
Type or Description of Plan (e.g., PPC, SPCC, etc.)		Attached?		Date of Latest Plan Update	
Integrated Contingency Plan (ICP)		<input type="checkbox"/>		September 2020	
		<input type="checkbox"/>			
		<input type="checkbox"/>			
5. Identify and describe all non-stormwater discharges that are expected to occur during the 5 years following permit issuance. Describe the frequency and volume of all such anticipated discharges.					
<input checked="" type="checkbox"/> No non-stormwater discharges are anticipated during the 5 years following coverage or approval					
6. Describe how often stormwater outfalls are inspected and routine maintenance performed.					
<p>Outfall 006 is inspected at least annually. The sedimentation basin and surrounding area are inspected weekly for the following: soil stability, condition of rip-rap and terraces, slopes of basin for signs of erosion, skimmer structures, level of sediment in basin, and sediment load in downstream channel. The level of the sedimentation basin is maintained annually, and everything else is maintained on an as needed basis.</p> <p>The Burning Ground dikes and sediment traps are checked for the ability to collect sediment. The area surrounding the burn pans and burn cages are cleaned of residue (ejected PEP, ash) and the condition of pans and covers are checked for cracks on a weekly basis. The Burning Ground area lies within the proposed Outfall 007 drainage area.</p>					

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