pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

SOUTHWEST REGIONAL OFFICE
CLEAN WATER PROGRAM

NPDES PERMIT FACT SHEET ADDENDUM

Application Type	**Renewal**	Application No.	**PA0254151**
Facility Type	**Industrial**	APS ID	**992556**
Major / Minor	**Minor**	Authorization ID	**1272166**

Applicant and Facility Information

Applicant Name	**Sprague Energy LLC**	Facility Name	**Bridge Street Bulk Plant**
Applicant Address	1045 W Chestnut Street	Facility Address	44 Bridge Street
	Washington, PA 15301-4136		Washington, PA 15301-5306
Applicant Contact	Camden Zappi	Facility Contact	Same as Applicant
Applicant Phone	(724) 705-7027	Facility Phone	Same as Applicant
Client ID	321124	Site ID	590661
SIC Code	5171	Municipality	Washington City
SIC Description	Wholesale Trade - Petroleum Bulk Stations and Terminals	County	Washington
Date Published in PA Bulletin	June 29, 2019	EPA Waived?	Yes
Comment Period End Date	July 28, 2019	If No, Reason	

Purpose of Application: Application for a renewal of an NPDES permit for discharge of treated Industrial

Internal Review and Recommendations

The notice of the draft permit was published in the Pennsylvania Bulletin on June 29, 2019. Comments were received from Ken Dudash with Letterle Associates on behalf of Sprague Energy, LLC.

Permittee's Comment #1:
The required testing parameters are the same and the benchmark values the same, so what conditions make the discharge at Outfall #001 any different than PAG-03 permit discharges that required less parameter sampling? The parameter sampling at Outfall #001 should be similar to requirements of other PAG-03 stormwater permits at other site which only require TSS and O&G sampling twice a year. Nitrates and pH are not required on regular PAG-03 permits.

Department's Response to Comment #1:

As discussed in the Draft Fact Sheet the sampling requirements for Nitrate, pH, and Flow were imposed in the previous permit. The pH limitations are from 25 PA Code Chapter 95.2(1). Flow monitoring is from the old regulation 25 PA Code Chapter 92.41 and has been replaced with 92a.61(d)(1). pH and Flow monitoring are typically not monitored for stormwater discharges because the nature of the discharge; therefore, they will be removed from the permit. The Nitrate-Nitrite monitoring requirement was originally imposed in the permit because the sampling results were above the EPA's Multi-Sector General Permit (MSGP) benchmark value. Nitrate-Nitrite is no longer a pollutant of concern because none of the operations done on site should cause Nitrate-Nitrite to be in the stormwater discharge and Nitrate-Nitrite is a natural occurring pollutant. Nitrate-Nitrite sampling will be removed from the permit to reflect the corresponding PAG-03 appendix for Petroleum Marketing Terminals.

Approve	Deny	Signatures	Date
X		Adam Olesnanik / Environmental Engineering Specialist	8-5-19
✓		Michael E. Fifth, P.E. / Environmental Engineer Manager	8/6/19

Internal Review and Recommendations

Permittee's Comment #2:

Another permit requirement that is not similar to other permits is the requirement of system samples to be twice a month when all other PAG-05 permits only require once a month sampling. The system is for petroleum remediation and the general PAG-05 permit was developed for these types of sites, so sample requirements should be similar.

Department's Response to Comment #2:

As discussed in the Draft Fact Sheet the sample frequency of twice per month was imposed in the previous permit. This was based on the PAG-05 requirements when the permit was originally issued in 2010. The monitoring frequency of the PAG-05 permit was changed to once per month in 2013. Therefore, the monitoring frequency for Outfall 002 will be reduced to once per month to be consistent with the requirements for the current PAG-05 general permit.

Department Initiated Changes:

A site inspection was conducted by the Department during the comment period on July 2, 2019. During the inspection, an additional, unpermitted outfall was discovered. The outfall is a stormwater outfall that discharges sheet flow next to the groundwater treatment building. Contributing activities and areas would consist of the unloading area for the ASTs and the gravel lot. This outfall will be included in the NPDES permit as Outfall 003. The outfall information and the effluent limitations are described below in this Fact Sheet.

Conclusion and Recommendations:

Monitoring requirements for Flow, pH, and Nitrate-Nitrite have been removed from Outfall 001 to reflect current stormwater outfall requirements. Monitoring frequency for Outfall 002 has been reduced from twice a month sampling to once per month sampling to reflect the current conditions in the PAG-05 permit. An additional stormwater outfall has been added to the permit, Outfall 003.

Due to the addition of another outfall, the permit is to be redrafted for an additional 30-day public comment period.

During the inspection eight violations were noted. These violations are open violations that will need to be resolved prior to the issuance of the Final Permit.

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.	003	Design Flow (MGD)	0
Latitude	40º 10' 37.94"	Longitude	-80º 15' 39.77"
Quad Name	Washington West	Quad Code	1703
Wastewater Description:	Stormwater		

Receiving Waters	Catfish Creek (WWF)	Stream Code	37132
NHD Com ID	99694618	RMI	0.45
Drainage Area	4.26	Yield (cfs/mi^2)	0.0115
Q_{7-10} Flow (cfs)	0.0489	Q_{7-10} Basis	USGS StreamStats
Elevation (ft)	1016	Slope (ft/ft)	0.001
Watershed No.	20-F	Chapter 93 Class.	WWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	Metals, Nutrients, Organic Enrichment/Low D.O., Siltation, Total Suspended Solids (TSS)		
Source(s) of Impairment	Acid Mine Drainage, Agriculture, Combined Sewer Overflows, Habitat Modification - Other Than Hydromodification, Urban Runoff/Storm Sewers		
TMDL Status	Final	Name	Chartiers Creek, Watershed

Nearest Downstream Public Water Supply Intake	West View Municipal Authority		
PWS Waters	Ohio River	Flow at Intake (cfs)	4,730
PWS RMI	972	Distance from Outfall (mi)	>40

Development of Effluent Limitations

Outfall No. 003 **Design Flow (MGD)** 0
Latitude 40º 10' 37.94" **Longitude** -80º 15' 39.77"
Wastewater Description: Stormwater

Technology-Based Limitations

Stormwater Technology Limits

Outfall 003 will be subject to PAG-03 General Stormwater Permit conditions as a minimum requirement because the outfall receives stormwater. The SIC code for the site is 5171 and the corresponding appendix of the PAG-03 that would apply to the facility is Appendix L. The reporting requirements applicable to stormwater discharges are shown in Table 1 below.

Table 1: PAG-03 Appendix (L) Monitoring Requirements

Parameter	Max Daily Concentration	Measurement Frequency	Sample Type
Total Suspended Solids (TSS)	Monitor and Report	1/6 Months	Grab
Oil and Grease	Monitor and Report	1/6 Months	Grab

Water Quality-Based Limitations

Stormwater WQBELs

Water quality analyses are typically performed under low-flow (Q7-10) conditions. Stormwater discharges occur at variable rates and frequencies but not however during Q7-10 conditions. Since the discharges from Outfall 003 is composed entirely of stormwater, a formal water quality analysis cannot be accurately conducted. Accordingly, water quality-based effluent limitations based on water quality analyses are not proposed.

Total Maximum Daily Loads

Discharges from the site are located within the Chartiers Creek Watershed for which the Department has developed a TMDL. The TMDL was finalized in April 2003 and establishes waste load allocations for the discharge of aluminum, iron and manganese within the watershed. The metal impairments result from acid drainage from abandoned coal mines. Section 303(d) of the Clean Water Act and the U.S. Environmental Protection Agency's Water Quality Planning and Management Regulations (codified at Title 40 of the *Code of Federal Regulations* Part 130) require states to develop a TMDL for impaired water bodies. A TMDL establishes the amount of a pollutant that a water body can assimilate without exceeding the water quality criteria for that pollutant. TMDLs provide the scientific basis for a state to establish water quality-based controls to reduce pollution from both point and non-point sources in order to restore and maintain the quality of the state's water resources (USEPA 1991a).

Only one non-mining point source located in the Chartiers Creek watershed is permitted to discharge iron, aluminum or manganese. It was assumed that discharges from all other point sources do not contain aluminum, iron, and manganese since they are not permitted to discharge these metals. Therefore, these points source were not considered as potential sources of the metal impairments in the Chartiers Creek watershed. In other words, if it is determined that a site is discharging wastewater containing these parameters, the site must meet the instream criterion values for these parameters at the point of discharge. However, in this case the only discharge from Outfall 003 is stormwater, therefore, no limitations for aluminum, iron and manganese will be imposed at Outfall 003 based on the Chartiers Creek Watershed TMDL.

Proposed Effluent Limitations and Monitoring Requirements

The proposed effluent monitoring requirements for Outfall 003 are displayed in Table 2 below, they are the most stringent values from the above effluent limitation development. As discussed, the Draft Permit requires a Corrective Action Plan when there are two consecutive exceedances of the benchmark values, which are also included in the Part C condition. The benchmark values are displayed below in Table 2. These values are not effluent limitations, an exceedance of the benchmark value is not a violation. As described above, if there are two consecutive exceedances of the benchmark value, a corrective action plan must be conducted to evaluate site stormwater controls and BMPs. Benchmark monitoring is a feedback tool, along with routine inspections and visual assessments, for assessing the effectiveness of stormwater controls and BMPs. An exceedance of the benchmark provides permittees with an indication that the facility's controls may not be sufficiently controlling pollutants in stormwater.

Table 2: Proposed Effluent Monitoring Requirements

Parameter	Max Daily Concentration	Benchmark Values (mg/L)	Measurement Frequency	Sample Type
Total Suspended Solids (TSS)	Report	100	1/6 Months	Grab
Oil and Grease	Report	30	1/6 Months	Grab