pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0254533**
Facility Type	**Storm Water**	APS ID	**1087549**
Major / Minor	**Minor**	Authorization ID	**1438009**

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

Applicant and Facility Information

Applicant Name	**Petermann Northeast LLC**	Facility Name	**West Greene Facility**
Applicant Address	2601 Navistar Drive	Facility Address	3250 Golden Oaks Road
	Lisle, IL 60532-3661		Rogersville, PA 15359-1502
Applicant Contact	Michael Pieroni	Facility Contact	Kathy Flowers
Applicant Phone	(630) 297-1235	Facility Phone	(724) 710-1051
Client ID	286929	Site ID	754807
SIC Code	4151	Municipality	Center Township
SIC Description	Trans. & Utilities - School Buses	County	Greene
Date Application Received	April 18, 2023	EPA Waived?	Yes
Date Application Accepted		If No, Reason	
Purpose of Application	Renewal NPDES Permit Coverage		

Summary of Review

The Department received a renewal NPDES permit application from Petermann Northeast LLC to continue coverage of their West Greene Facility on April 18, 2023.

The site serves as a school bus maintenance, parking, and fueling facility. On-site there is a maintenance shop, one 1,000-gallon above ground storage tank (AST) holding gasoline, one 1,000-gallon AST holding diesel, one 275-gallon AST holding waste oil, and one 225-gallon AST holding new oil. The diesel and gasoline ASTs are located outdoors on a designated fueling island at the facility, and the waste oil and new oil ASTs are located within the maintenance shop. Fueling and bus parking occur outdoors and not under cover. Bus washing and other vehicle cleaning is not completed at this facility.

The site has one stormwater outfall, Outfall 001. Outfall 001 discharges to South Fork Tenmile Creek, which is designated in 25 PA Code 93 as a High-Quality Warm Water Fishery (HQ-WWF). Outfall 001 captures stormwater from the entire property including the building roof, fueling area, and parking area. This includes impervious concrete surfaces, gravel parking, and grassy area.

There are no known or reported history of non-stormwater discharges at the facility according to the PPC plan.

Based on eDMR data, the West Greene facility consistently meets the permit benchmark of 30 mg/L for Oil and Grease. During 2021, the facility consecutively exceeded the benchmark of 100 mg/L for Total Suspended Solids (TSS). Both concentrations reported in 2021 were over four times the benchmark. A corrective action plan (CAP) was submitted to the Department January 2022. The CAP stated that increased sweeping would be conducted on-site. The concentration of TSS was significantly reduced during the first monitoring period of 2022. However, the TSS concentration reported for the second monitoring period

Approve	Deny	Signatures	Date
X		Jamie Ley Jamie Ley / Environmental Engineering Trainee	July 12, 2023
X		Michael E. Fifth Michael E. Fifth, P.E. / Environmental Engineer Manager	August 4, 2023

Summary of Review

of 2022 was over four times the benchmark value. It is recommended that the facility consider additional BMPs to mitigate high concentrations of TSS in its stormwater.

No violations were found for this facility within the last five years.

Two inspections have occurred at this facility within the last five years. The first inspection was an Administrative/File Review which occurred February 26, 2021. The second inspection was a Compliance Evaluation which occurred March 23, 2021. Neither inspection noted any violations.

An individual stormwater permit is required given that the receiving stream, South Fork Tenmile Creek, is classified as HQ-WWF as per 25 PA Code § 93.9. To ensure that the discharge does not degrade the receiving stream, no exposure benchmark values will be used in place of the standard stormwater benchmark values in the permit. The goal for the permittee is to consistently achieve these benchmark values. Doing this shows that the discharges are uncontaminated stormwater and will maintain and protect the existing quality of the receiving water. A Part C condition is included in the Draft Permit requiring a Corrective Action Plan when there is an exceedance of the benchmark values, which are also included in the Part C condition. As described above, if there is an exceedance of any benchmark value, a Corrective Action Plan must be developed and submitted to evaluate site stormwater control and BMPs. Benchmark monitoring is a feedback tool, along with routine inspections and visual assessments, for assessing the effectiveness of stormwater controls and BMPs.

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.	001	Design Flow (MGD)	0
Latitude	39º 52' 26"	Longitude	-80º 16' 47"
Quad Name	Holbrook	Quad Code	2003
Wastewater Description:	Stormwater		

Receiving Waters	South Fork Tenmile Creek	Stream Code	40293
NHD Com ID	99417070	RMI	28.61
Drainage Area	N/A	Yield (cfs/mi^2)	N/A
Q_{7-10} Flow (cfs)	N/A	Q_{7-10} Basis	N/A
Elevation (ft)	983	Slope (ft/ft)	N/A
Watershed No.	19-B	Chapter 93 Class.	HQ-WWF
Existing Use	HQ-WWF	Existing Use Qualifier	N/A
Exceptions to Use	None	Exceptions to Criteria	None
Assessment Status	Attaining Use(s)		
Cause(s) of Impairment	N/A		
Source(s) of Impairment	N/A		
TMDL Status	N/A	Name	

Nearest Downstream Public Water Supply Intake	Southwestern PA Water Authority (INACTIVE)		
PWS Waters	South Fork Tenmile Creek	Flow at Intake (cfs)	0.471
PWS RMI	20.1	Distance from Outfall (mi)	8.5

Changes Since Last Permit Issuance: None.

Other Comments: None.

Development of Effluent Limitations

Technology-Based Limitations

Stormwater Technology Limits

Outfall 001 is subject to PAG-03 General Stormwater Permit conditions as a minimum requirement because the outfall discharges stormwater associated with industrial activity. The SIC code for the site is 4151 (School Buses) 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. Along with the monitoring requirements, sector specific BMPs included in Appendix L of the PAG-03 will also be included in Part C of the Draft Permit.

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

Parameter	Max Daily Concentration	Measurement Frequency	Sample Type
Total Nitrogen	Monitor and Report	1/6 Months	Calculation
Total Phosphorus	Monitor and Report	1/6 Months	Grab
Oil & Grease (O & G)	Monitor and Report	1/6 Months	Grab
Total Suspended Solids (TSS)	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 discharge from Outfall 001 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.

Anti-Degradation

Antidegradation regulations under Chapter 93.4c(a)(l)(i) require dischargers to protect the existing use of receiving waters. Chapter 93.4c(b) requires dischargers to consider non-discharge alternatives, public participation and social/economic justification when proposing new, additional or increased discharges to high quality or exceptional value streams. Existing use protection required under Chapter 93.4c(a)(l)(i) is ensured for discharges to high quality streams imposing the most stringent of technology-based, water quality based and non-degrading effluent limitations. In this case, non-degradation effluent limitations are not applicable because the discharge is stormwater only. To ensure that the discharge does not degrade the stream, the no exposure benchmark values will be used as the benchmark value for O & G, Total Nitrogen, Total Phosphorus, and TSS in the permit. The goal for the permittee is to discharge wastewater consistently below these benchmark values; doing this shows that the discharges are uncontaminated stormwater and will maintain and protect the existing quality of the receiving waters.

Anti-Backsliding

Previous limits can be used pursuant to EPA's anti-backsliding regulation, 40 CFR 122.44(l). Previous limits imposed at Outfall 001 are displayed below in Table 2.

Table 2. Existing Effluent Limitations

Parameter	Average Monthly	Daily Maximum	Measurement Frequency	Sample Type
Oil & Grease (O & G)	XXX	Report	1/6 Months	Grab
Total Suspended Solids (TSS)	XXX	Report	1/6 Months	Grab

Proposed Effluent Limitations and Monitoring Requirements

The proposed effluent monitoring requirements for Outfall 001 are displayed in Table 3 below. They are the most stringent values from the above effluent limitation development. The sampling frequency is semi-annual to be consistent with the PAG-03 general permit sampling frequency. A Part C condition is included in the Draft Permit requiring submission of a Corrective Action Plan whenever there is an exceedance of any benchmark value, which are also included in the Part C condition. The benchmark values are displayed below in Table 3. These values are not effluent limitations. An exceedance of the benchmark value is not a violation. As described above, if there is an exceedance of the benchmark values, a Corrective Action Plan must be developed and submitted to the Department 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. To ensure that the discharge is not degrading the high-quality waters, the no exposure benchmark values will be used as the benchmark values in the permit.

Table 3: Proposed Effluent Monitoring Requirements

Parameter	Max Daily Concentration	Benchmark Values (mg/L)	Measurement Frequency	Sample Type
Total Nitrogen	Monitor and Report	2.0	1/6 Months	Calculation
Total Phosphorus	Monitor and Report	1.0	1/6 Months	Grab
Oil & Grease (O & G)	Monitor and Report	5.0	1/6 Months	Grab
Total Suspended Solids (TSS)	Monitor and Report	30.0	1/6 Months	Grab

Tools and References Used to Develop Permit	
☐	WQM for Windows Model (see Attachment)
☐	Toxics Management Spreadsheet (see Attachment)
☐	TRC Model Spreadsheet (see Attachment)
☐	Temperature Model Spreadsheet (see Attachment)
☐	Water Quality Toxics Management Strategy, 361-0100-003, 4/06.
☐	Technical Guidance for the Development and Specification of Effluent Limitations, 386-0400-001, 10/97.
☐	Policy for Permitting Surface Water Diversions, 386-2000-019, 3/98.
☐	Policy for Conducting Technical Reviews of Minor NPDES Renewal Applications, 386-2000-018, 11/96.
☐	Technology-Based Control Requirements for Water Treatment Plant Wastes, 386-2183-001, 10/97.
☐	Technical Guidance for Development of NPDES Permit Requirements Steam Electric Industry, 386-2183-002, 12/97.
☐	Pennsylvania CSO Policy, 386-2000-002, 9/08.
☐	Water Quality Antidegradation Implementation Guidance, 391-0300-002, 11/03.
☐	Implementation Guidance Evaluation & Process Thermal Discharge (316(a)) Federal Water Pollution Act, 386-2000-008, 4/97.
☐	Determining Water Quality-Based Effluent Limits, 386-2000-004, 12/97.
☐	Implementation Guidance Design Conditions, 386-2000-007, 9/97.
☐	Technical Reference Guide (TRG) WQM 7.0 for Windows, Wasteload Allocation Program for Dissolved Oxygen and Ammonia Nitrogen, Version 1.0, 386-2000-016, 6/2004.
☐	Interim Method for the Sampling and Analysis of Osmotic Pressure on Streams, Brines, and Industrial Discharges, 386-2000-012, 10/1997.
☐	Implementation Guidance for Section 95.6 Management of Point Source Phosphorus Discharges to Lakes, Ponds, and Impoundments, 386-2000-009, 3/99.
☐	Technical Reference Guide (TRG) PENTOXSD for Windows, PA Single Discharge Wasteload Allocation Program for Toxics, Version 2.0, 386-2000-015, 5/2004.
☐	Implementation Guidance for Section 93.7 Ammonia Criteria, 386-2000-022, 11/97.
☐	Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers, 386-2000-013, 4/2008.
☐	Implementation Guidance Total Residual Chlorine (TRC) Regulation, 386-2000-011, 11/1994.
☐	Implementation Guidance for Temperature Criteria, 386-2000-001, 4/09.
☐	Implementation Guidance for Section 95.9 Phosphorus Discharges to Free Flowing Streams, 386-2000-021, 10/97.
☐	Implementation Guidance for Application of Section 93.5(e) for Potable Water Supply Protection Total Dissolved Solids, Nitrite-Nitrate, Non-Priority Pollutant Phenolics and Fluorides, 386-2000-020, 10/97.
☐	Field Data Collection and Evaluation Protocol for Determining Stream and Point Source Discharge Design Hardness, 386-2000-005, 3/99.
☐	Implementation Guidance for the Determination and Use of Background/Ambient Water Quality in the Determination of Wasteload Allocations and NPDES Effluent Limitations for Toxic Substances, 386-2000-010, 3/1999.
☐	Design Stream Flows, 386-2000-003, 9/98.
☐	Field Data Collection and Evaluation Protocol for Deriving Daily and Hourly Discharge Coefficients of Variation (CV) and Other Discharge Characteristics, 386-2000-006, 10/98.
☐	Evaluations of Phosphorus Discharges to Lakes, Ponds and Impoundments, 386-3200-001, 6/97.
☐	Pennsylvania's Chesapeake Bay Tributary Strategy Implementation Plan for NPDES Permitting, 4/07.
☒	SOP: No. BPNPSM-PMT-001 (*New and Reissuance Industrial Waste and Industrial Stormwater Individual NPDES Permit Application*)
☐	Other: