

### Southwest Regional Office CLEAN WATER PROGRAM

Application Type Renewal
Facility Type Storm Water
Major / Minor Minor

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

Application No. PA0255360

APS ID 1101781

Authorization ID 1463395

Applicant Name	Three LLC	Rivers Marine & Rail Terminal	Facility Name	Belle Vernon (aka Gibsonton) River Terminal
Applicant Address	PO Bo	x 100 107 Pennsylvania Avenue	Facility Address	2244 Gibsonton Lane
	Dunle	vy, PA 15432-0100		Belle Vernon, PA 15012
Applicant Contact	Josep	h Shearer	Facility Contact	Joseph Shearer
Applicant Phone	(724)	489-4100	Facility Phone	(724) 489-4100
Client ID	11484	0	Site ID	827594
SIC Code	4225,4	1491	Municipality	Rostraver Township
SIC Description	and St	& Utilities - General Warehousing torage, Trans. & Utilities - Marine Handling	County	Westmoreland
Date Application Rec	eived	November 30, 2023	EPA Waived?	Yes
Date Application Acc	epted	March 18, 2024	If No, Reason	

### **Summary of Review**

On November 30, 2023, the Department received a timely NPDES permit renewal application from Three Rivers Marine & Rail Terminal, LLC for the Belle Vernon River Terminal (aka Gibsonton River Terminal) located in Rostraver Township of Westmoreland County. The facility's industrial activities are classified under SIC Codes 4225 and 4491 – Trans. & Utilities - General Warehousing and Storage, Trans. & Utilities - Marine Cargo Handling.

Belle Vernon River Terminal is an 86-acre (approximately 90% impervious) transfer, storage, and packaging facility located in Rostraver Township, Westmoreland County. The facility is located along the Monongahela River at Mile Marker 42.5, refer to the attached Site Plan Figures. Materials are transported in and out of the facility by barge, truck, and rail. Three Rivers handles bulk materials that include the following: salt, coal/coke, stone, sand, gravel, fertilizer, metal goods, and finished products. Salt is stored outdoors on a paved storage pad. Stockpiled fertilizer is stored indoors within a large warehouse structure toward the center of the property. Some fertilizer and salt stockpiles are also located inside the Keystone Building at the northern end of the property where all bagging operations take place. The bagging operation includes packaging of bulk materials (i.e., salt and fertilizer) for commercial sale. Bagged and wrapped finished products are stored outdoors in the general vicinity of the Keystone Building. There is also an approximately 1.4-acre area towards the middle of the property that is utilized by ECO Solutions (Third Party) as a tank storage and transfer area for dust suppression and freeze condition agents.

The majority of the site is covered by a combination of asphalt, gravel, and slag that was deposited during past industrial activities (including steel-making) at the site. Upon acquiring the site in 1988, Three Rivers conducted a general site cleanup, which included the removal of scrap metal, oil tanks, and remnants of demolished buildings that were abandoned at the site.

Approve	Deny	Signatures	Date
X		Curtis Holes, P.E. / Environmental Engineer	April 12, 2024
Х		Michael E. Fifth, P.E. / Environmental Engineer Manager	April 12, 2024

#### **Summary of Review**

The site includes a scale house, paved access road, paved outdoor salt storage pads, an indoor storage building, the bagging building, dock improvements, and additional stormwater management features.

Stormwater from the site's operational areas generally flows to one of the three existing stormwater ponds, designated as Pond 1, Pond A, and Pond B. The stormwater from these ponds discharges through Outfalls 001, 002, and 003 respectively. Pond 1 (Outfall 001) receives the bulk of the contact stormwater of the facility, including runoff from the outdoor salt stockpiles, sand/gravel piles, and remnant coal/coke pile areas. Pond A (Outfall 002) receives stormwater primarily from the southern portion of the Keystone Building\, its surrounding (mostly paved) finished product storage areas, currently uses stockpile areas, and the ECO Solutions tank storage area. Pond B (Outfall 003) receives stormwater runoff from the northern portion of the Keystone Building and its surrounding (mostly paved) finished product storage areas.

The NPDES Permit was amended on June 02, 2022 to address stormwater management associated with two (2) projects involving Ponds A and 1 and their associated drainage areas. Project 1: The new indoor salt storage area will be constructed. The stormwater from the indoor salt storage area is not required to be directed to a lined pond. The drainage area for Pond 1 was decreased by redirecting stormwater not associated with the outdoor salt storage area to Pond A and discharged via Outfall 002. This change decreases the required storage volume design of the New Lined Pond (Salt Pond). Project 2: Revised design of the to be constructed Salt Pond for the outdoor salt storage, accounting for the smaller drainage area. The Salt Pond will collect the stormwater from the outdoor salt storage pile and ultimately discharge via Pond 1.

The previous permit contained a compliance schedule to construct/install the Best Management Practice (BMP) of a lined pond for stormwater from an outdoor salt storage area. The Lined Salt Pond was not constructed during the previous permit cycle due to unforeseen delays. The current anticipated construction schedule of the Salt Pond completion is September 2025 (not accounting for potential weather impacts). Part C of the Draft Permit will contain a compliance schedule to construct/install the Lined Salt Pond.

There are no current open violations by Client ID.

The PPC Plan is dated March 2024 and identifies that no spills or releases have occurred.

The last inspection conducted by the Department was on August 10, 2022 by James Stewart with no violations identified. The facility was also inspected due to a complaint by James Stewart on February 22, 2024, with no violations identified.

It is recommended that a draft permit be published for public comment in response to this application.

#### **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.

scharge, Receiving	g Waters and Water Supply Infor	mation	
Outfall No. 001		Design Flow (MGD)	0 (varied)
Latitude 40° 0	7' 47"	Longitude	-79° 52' 57"
Quad Name Monongahela		Quad Code	1706
Wastewater Description: Stormwater			
Receiving Waters	Monongahela River (WWF)	Stream Code	37185
NHD Com ID	99409968	RMI	43.66
Drainage Area	99409900	Yield (cfs/mi²)	43.00
Q <sub>7-10</sub> Flow (cfs) 550		Q <sub>7-10</sub> Basis	U.S. Army Corp of Engineers
Elevation (ft)	743	Slope (ft/ft)	0.001
Watershed No.	19-C	Chapter 93 Class.	WWF
Existing Use	WWF	Existing Use Qualifier	
Exceptions to Use	None	Exceptions to Criteria	None
Assessment Status	Impaired	<u> </u>	
Cause(s) of Impairr	ment POLYCHLORINATED BII	PHENYLS (PCBS)	
Source(s) of Impair			
TMDL Status	Final	Name Monongahel	la River TMDL
		· · · · · · · · · · · · · · · · · · ·	
Nearest Downstrea	m Public Water Supply Intake	Authority of Borough of Charle	eroi (9.9 MGD)
PWS Waters	Monongahela River	Flow at Intake (cfs)	550
PWS RMI 4	42.94	Distance from Outfall (mi)	0.32

Changes Since Last Permit Issuance:

Other Comments:

scharge, Receiving Wat	ers and Water Supply Info	rmation			
Outfall No. 002		Design Flow (MGD)	0 (varied)		
Latitude 40° 08' 02	1	Longitude	-79° 53' 14"		
Quad Name Mononga	ahela	Quad Code	1706		
Wastewater Description:	Stormwater				
Receiving Waters Mor	ongahela River (WWF)	Stream Code	37185		
	09912	RMI	43.66		
Drainage Area		Yield (cfs/mi²)			
Q <sub>7-10</sub> Flow (cfs) 550		Q <sub>7-10</sub> Basis	U.S. Army Corp of Engineers		
Elevation (ft)		Slope (ft/ft)	0.001		
Watershed No. 19-0		Chapter 93 Class.	WWF		
Existing Use	F	Existing Use Qualifier			
Exceptions to Use Non	<u>e</u>	Exceptions to Criteria	None		
Assessment Status  Cause(s) of Impairment	Impaired POLYCHLORINATED BI (PCBS)	PHENYLS (PCBS), POLYCHLO	RINATED BIPHENYLS		
Source(s) of Impairment	SOURCE UNKNOWN, S	OURCE UNKNOWN			
TMDL Status	Final	Name Monongahe	la River TMDL		
Nearest Downstream Pub	olic Water Supply Intake	Authority of Borough of Charle	eroi (9.9 MGD)		
PWS Waters Monor	ngahela River	Flow at Intake (cfs) 550			
PWS RMI 42.94		Distance from Outfall (mi)	0.0		

Changes Since Last Permit Issuance:

Other Comments:

Discharge, Receivi	ng Water	s and Water Supply Infor	mation	
<del>-</del>				
Outfall No. 003	3		Design Flow (MGD)	0
Latitude 40°	08' 13"	_	Longitude	-79º 53' 19"
Quad Name M	lonongah	ela	Quad Code	1706
Wastewater Desc	ription:	Stormwater		
				_
Receiving Waters	Mono	ngahela River (WWF)	Stream Code	37185
NHD Com ID	99409	912	RMI	42.2
Drainage Area			Yield (cfs/mi²)	
Q <sub>7-10</sub> Flow (cfs)	550		Q <sub>7-10</sub> Basis	U.S. Army Corp of Engineers
Elevation (ft)	-		Slope (ft/ft)	0.001
Watershed No.	19-C		Chapter 93 Class.	WWF
Existing Use	WWF		Existing Use Qualifier	
Exceptions to Use	None		Exceptions to Criteria	None
Assessment Statu	JS	Impaired		
Cause(s) of Impai	irment	POLYCHLORINATED BIF (PCBS)	PHENYLS (PCBS), POLYCHLO	RINATED BIPHENYLS
Source(s) of Impa	irment	SOURCE UNKNOWN, SO	OURCE UNKNOWN	
TMDL Status		Final	Name Monongahe	la River TMDL
Nearest Downstre	am Publi	c Water Supply Intake	PAWC – Aldrich (70 MGD)	
PWS Waters	Monong	ahela River	Flow at Intake (cfs)	550
PWS RMI	25.5		Distance from Outfall (mi)	17.4

Changes Since Last Permit Issuance:

Other Comments:

scharge, Receiving Waters and Water Supply In		
Outfall No. 101	Design Flow (MGD)	0.0 (varies)
Latitude	Longitude	
Quad Name Monongahela	Quad Code	1706
Wastewater Description: Stormwater from outdo	or salt storage piles.	

Changes Since Last Permit Issuance: Once the Salt Pond is constructed, IMP101 will be active.

### Compliance History

NPDES Permit No. PA0255360

### DMR Data for Outfall 001 (from March 1, 2023 to January 31, 2024)

Parameter	Limit/ Benchmark	JAN-24	DEC-23	NOV-23	OCT-23	SEP-23	AUG-23	JUL-23	JUN-23	MAY-23	APR-23	MAR-23
Flow (MGD)	Delicilliark											
Daily Maximum	Report	0.0030	0.0030	0.033	0.033	0.033	0.033	0.033	0.033	0.033	0.033	0.033
pH (S.U.)	- Nopon	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Daily Minimum	6.0	7.1	7.2	7.1	6.3	7.8	8.8	8.3	7.5	7.2	8.11	7.8
pH (S.U.)					0.0		0.0	0.0			9	110
IMAX	9.0	7.6	7.5	6.7	5.4	7.5	8.6	8.1	7.0	7.0	7.6	7.6
TSS (mg/L)												
IMAX ´ ´	50	152.0	9.0	230.0	62.0	293.0	24.0	23.0	359.0	359.0	107.0	107.0
Total Dissolved Solids												
(mg/L)												
Daily Maximum	2000	32900	42900	37800	55700	60700	48000	57400	30400	30400	7400	7400
Oil and Grease (mg/L)												
Daily Maximum	30	< 5.3	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	9.2	9.2	< 5.0	< 5.0
Fluoride (mg/L)												
Daily Maximum	Report	< 1.0	< 2.0	< 1.0	< 0.50	< 1.0	< 1.0	< 10.0	< 0.50	< 0.50	< 2.0	< 2.0
Dissolved Iron (mg/L)												
Daily Maximum	7.0	0.066	< 0.050	87.80	18.3	112	< 50.0	0.142	935	934	< 50.0	< 50
Total Iron (mg/L)												
Daily Maximum	Report	5.5	0.617	116.0	41.2	1530	532	2.320	13400	13400	9500	9.560
Sulfate (mg/L)												
Daily Maximum	Report	594	525	812	978	823	662	784	463	463	883	883
Chloride (mg/L)												
Daily Maximum	2000	23800	26500	19800	38000	40100	29900	35600	19500	19500	3960	3960
Bromide (mg/L)												
Daily Maximum	Report	6.7	11.0	8.2	< 50.0	< 50.0	< 5.0	< 50.0	5.5	5.5	< 10.0	< 10

### DMR Data for Outfall 002 (from March 1, 2023 to January 31, 2024)

Parameter	Limit/ Benchmark	JAN-24	DEC-23	NOV-23	OCT-23	SEP-23	AUG-23	JUL-23	JUN-23	MAY-23	APR-23	MAR-23
Flow (MGD)												
Daily Maximum	Report		0.0030									
pH (S.U.)												
Daily Minimum	6.0		6.8									
pH (S.U.)												
IMAX	9.0		6.5									
TSS (mg/L)												
Daily Maximum	100		8.0									
Oil and Grease (mg/L)												
Daily Maximum	30		< 5.1									
Dissolved Iron (mg/L)												
Daily Maximum	7.0		2.710									

### DMR Data for Outfall 003 (from March 1, 2023 to January 31, 2024)

Parameter	Limit/ Benchmark	JAN-24	DEC-23	NOV-23	OCT-23	SEP-23	AUG-23	JUL-23	JUN-23	MAY-23	APR-23	MAR-23
	Delicilliark											
Flow (MGD)												
Daily Maximum	Report		0.001									
pH (S.U.)												
Daily Minimum	6.0		7.7									
pH (S.U.)												
Instantaneous												
Maximum	9.0		7.6									
TSS (mg/L)												
Daily Maximum	100		< 4.0									
Oil and Grease (mg/L)												
Daily Maximum	30		< 5.2									
Dissolved Iron (mg/L)												
Daily Maximum	7.0		< 0.500									

Development of Effluent Limitations							
Outfall No.	001	Design Flow (MGD)	0 (varied)				
Latitude	40° 07' 47"	Longitude	-79º 52' 57"				
Wastewater I	Description:	Stormwater runoff associated with industrial activity (salt, ogoods storage)	coal, stone, sand, fertilizer, and metal				

#### **Application Sample Data**

Parameter	Average Concentration ( <sup>mg</sup> / <sub>L</sub> )	Permit Limit ( <sup>mg</sup> / <sub>L</sub> )	Permit Benchmark Value ( <sup>mg</sup> / <sub>L</sub> )	General Permit Benchmark Value ( <sup>mg</sup> / <sub>L</sub> )
Oil and Grease	<5.0		30.0	30.0
BOD <sub>5</sub>	8.6			30.0
COD	636			120.0
TSS	230	50.0		100.0
Total Nitrogen	19.2			
Total Phosphorous	1.3			
pH (S.U.)	6.7	9.0		9.0
TDS	37,800		2,000.0	
Total Fluoride	<1.0			
Dissolved Iron	87.8	7.0		
Total Iron	116			
Total Sulfate	812			
Chloride	19,800		2,000.0	2,000.0
Bromide	8.2			

#### Overview

Outfall 001 receives stormwater from an existing Pond 1 which has a drainage area of approximately 33.1 acres (91% impervious). The outfall structure is not constructed yet. The drainage area consists of a bulk storage building, maintenance shop, a scale house, fuel pumps, and existing and proposed storage for stone/gravel, salt, and coal. The south-east side of the facility has sand storage. The stormwater runoff from sand storage does not flow through Pond 1 (Outfall 001) and flows via overland flow directly to the Monongahela River. Stacked fertilizer is stored inside the bulk storage building. The stormwater from the outdoor salt piles is directed to the New Lined Pond. The discharge of the New Lined Pond is directed to Pond 1. The outdoor salt piles are stored on a paved surface and are covered with geosynthetic tarps to the extent practical based on loading and unloading operations.

Stormwater from Outfall 001 discharges directly to the Monongahela River which is classified as WWF per Chapter 93 Designated Use.

Several best management practice (BMP) features have been adopted within the Outfall 001 drainage area to control pollutants in stormwater that include sediment filtering devices, coverage of salt piles, paved salt storage pads, indoor storage, to be constructed lined stormwater pond, and housekeeping operations. The outdoor salt storage pile stormwater runoff will be directed to the lined Salt Pond (IMP 101), once constructed, prior to being directed to Pond 1.

#### **Technology-Based Effluent Limitations (TBELs)**

Outfall 001 effluent is comprised primarily of stormwater runoff from bulk storage building roof drains, catch basins, outdoor storage piles of salt, coal, stone, and sand. There are no specific Federal Effluent Limitation Guidelines (ELGs) or state regulations requiring effluent limitations for this type of discharge (coal and salt storage).

40 CFR 434 Subpart B regulates coal preparation plants and coal preparation plant associated areas. Three Rivers is not a coal preparation plant. A coal preparation plant associated activity is defined as, "discharges which are pumped, siphoned, or drained from the coal preparation plant water circuit and coal storage, refuse storage, and ancillary areas related to the cleaning or beneficiation of coal of any rank including, but not limited to, bituminous, lignite, and anthracite". It is understood

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that the facility will perform only storage and transfer related to coal activities. Since there will be no coal cleaning or beneficiation activity performed in coal storage areas, stormwater drainage from coal storage areas should not be subject to 40 CFR 434 requirements.

In the absence of a specific EPA-promulgated ELG, the Department uses Best Professional Judgement (BPJ) on a case-by-case basis to develop technology-based effluent limitations. The Department considers six factors as required by 40 CFR § 125.3 to develop TBELs on case-by-case basis. During the previous permit cycle, a BPJ analysis was completed and from the Steam Electric ELG, 50 mg/L of TSS IMAX limit was applied at Outfall 001 based on BPJ.

Stormwater runoff from salt storage in Outfall 001 drainage area falls under the category of PAG-03 Appendix K – Existing Salt Storage and Distribution Sites as displayed in Table 1 is a summary of parameters and benchmark values used for evaluating Best Management Practices (BMP).

Sample **Benchmark Discharge Parameter** Units **Type Values** рΗ S.U. 9.0 Grab **Total Suspended Solids** mg/L Grab 100 **Total Dissolved Solids** Grab mg/L Report Chloride mg/L Grab 2000 Total Nitrogen mg/L Calculate Report **Total Phosphorus** mg/L Grab Report

Table 1. PAG-03 – Appendix K Minimum Monitoring Requirements

Effluent standards for dissolved iron from 25 Pa. §95.2(4) will also be implemented.

#### Water Quality-Based Effluent Limitations (WQBELs)

A water quality analysis for Outfall 001 using TMS was not performed because Outfall 001 is a precipitation-based discharge and will not discharge continuously.

#### Total Maximum Daily Load (TMDL) Considerations

The Monongahela River has a final TMDL for PCBs and Chlordane from Point Marion L/D to Gray's Landing L/D. Three Rivers and its outfalls are located between Maxwell L/D and Charleroi L/D, downstream of the TMDL reach. No specific TMDL is listed for the current reach of concern in Monongahela River.

#### Total Dissolved Solids (TDS) and Major Constituents Monitoring

TDS and its major constituents including sulfate, chloride, and bromide have emerged as pollutants of concern in several major watersheds in the Commonwealth. The conservative nature of these solids allows them to accumulate in surface waters and they may remain a concern even if the immediate downstream public water supply is not directly impacted. A public water supply (PWS) intake (Authority of Borough of Charleroi) is situated within one mile downstream of Outfall 001 discharge location. Therefore, monitoring of PWS parameters (i.e., TDS, chloride, bromide, sulfate, fluoride) in Outfall 001 discharge will be applied.

Per Chapter 25 § 95.10(c), "new and expanding mass loadings of TDS … may not contain more than 2,000 mg/L of TDS as a monthly average, unless a variance is approved by the Department under this section". The treatment requirements per Chapter 25 § 95.10(c) are applicable to facilities that were authorized maximum daily discharges by the Department after August 21, 2010. Three Rivers held a general permit for the salt and coal storage since 2003, prior to the individual Stormwater Permit received in June 2019. The facility was not allocated a maximum daily discharge of TDS prior to August 21, 2010. However, since the facility held a permit prior to August 21, 2010, the Department will not impose a monthly average limit of 2,000 mg/L for TDS at Outfall 001. Instead, the Department will add 2000 mg/L as a benchmark of TDS in the permit so that the permittee can have the opportunity to develop a Corrective Action Plan (CAP) in case of benchmark exceedances.

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#### **Anti-Backsliding**

Section 402(o) of the Clean Water Act (CWA), enacted in the Water Quality Act of 1987, establishes anti-backsliding rules governing two situations. The first situation occurs when a permittee seeks to revise a Technology-Based effluent limitation based on BPJ to reflect a subsequently promulgated effluent guideline which is less stringent. The second situation addressed by Section 402(o) arises when a permittee seeks relaxation of an effluent limitation which is based upon a State treatment standard of water quality standard.

Previous limits can be used pursuant to EPA's anti-backsliding regulation 40 CFR 122.44 (*I*) Reissued permits. (1) Except as provided in paragraph (*I*)(2) of this section when a permit is renewed or reissued. Interim effluent limitations, standards or conditions must be at least as stringent as the final effluent limitations, standards, or conditions in the previous permit (unless the circumstances on which the previous permit was based have materially and substantially changed since the time the permit was issued and would constitute cause for permit modification or revocation and reissuance under §122.62). (2) In the case of effluent limitations established on the basis of Section 402(a)(1)(B) of the CWA, a permit may not be renewed, reissued, or modified on the basis of effluent guidelines promulgated under section 304(b) subsequent to the original issuance of such permit, to contain effluent limitations which are less stringent than the comparable effluent limitations in the previous permit.

The facility is not seeking to revise the previously permitted effluent limits.

#### **Effluent Limitations and Monitoring Requirements for Outfall 001**

Effluent limits imposed at Outfall 001 are the most stringent of TBELs, WQBELs, regulatory effluent standards and monitoring requirements as described in the sections above. The applicable requirements are summarized in Table 2. Since discharges from Outfall 001 are precipitation-induced and non-continuous, grab sampling will be required for all parameters except flow, which should be estimated. The monthly monitoring frequency will be maintained from the previous permit.

Table 2. Monitoring Requirements for Outfall 001

Parameter	Minimum	Average Monthly	Daily Maximum	Instantaneous Maximum	Sample Frequency	Sample Type
Flow (MGD)	-	-	Report	-	1/month	Estimated
рН	-	-	-	9.0	1/month	Grab
Total Suspended Solids (mg/L)	-	-	-	50.0	1/month	Grab
Total Dissolved Solids (mg/L)	-	-	Report	-	1/month	Grab
Chloride (mg/L)	-	-	Report	-	1/month	Grab
Oil and Grease (mg/L)	-	-	Report	-	1/month	Grab
Total Iron (mg/L)	-	-	Report	-	1/month	Grab
Dissolved Iron (mg/L)	-	-	Report	7.0	1/month	Grab
Total Nitrogen (mg/L)	-	-	Report	-	1/month	Calculate
Total Phosphorus (mg/L)	-	-	Report	-	1/month	Grab

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Development of Effluent Limitations						
Outfall No.	002 / 003		Design Flow (MGD)	0.0 (varied)		
Latitude	40° 08' 02" / 40	<sup>0</sup> 08' 13"	Longitude	-79° 53' 14" / -79° 53' 19"		
Wastewater Description: Stormwater runoff ass			associated with industrial activity (steel/fin	ished products and pallets)		

#### **Overview**

Outfall 002 receives stormwater from approximately 20.6 acres of drainage area from the central section of the property. The stormwater runoff from indoor salt and fertilizer storage area, steel and finished product storage areas, roofs, and general operations (vehicular traffic, loading/unloading) is directed to Pond A. A 24-inch stormwater pipe is used to convey discharge from Pond A to Outfall 002. Outfall 002 discharges directly to Monongahela River that is classified as WWF per Chapter 93 Designated Use.

Outfall 003 receives stormwater from approximately 7.5 acres of drainage area from the north side of property. The stormwater runoff from finished product storage areas, roofs, and general operations (vehicular traffic, loading/unloading) is directed to Pond B. A 24-inch corrugated metal pipe (CMP) is used to convey discharge from Pond B to Outfall 003. Outfall 003 discharges directly to Monongahela River that is classified as WWF per Chapter 93 Designated Use.

#### **Technology-Based Effluent Limitations (TBELs)**

Outfalls 002 and 003 effluents are comprised solely of stormwater runoff from roof drains, catch basins, finished products, and general operations such as vehicular traffic and loading/unloading of bulk/finished products. There is no coal and salt storage in Outfalls 002 and 003 drainage areas. There are no Federal Effluent Limitation Guidelines (ELGs) or state regulations requiring effluent limitations for this type of discharge. In lieu of a federal ELG, Section III of DEP's IW Effluent

Outfalls 002 and 003 drainage areas fall under the two (2) categories of PAG-03, Appendix L – Land Transportation and Petroleum Stations and Terminals (Motor Freight Transportation and Warehousing) and Appendix J – Various (other stormwater discharges designated as needing a permit or any facility discharging stormwater associated with industrial activity not described by any other appendix) are displayed in Table 3.

Table 3. PAG-03 - Appendix J / Appendix L Minimum Monitoring Requirements

Discharge Parameter	Units	Sample Type	Benchmark Values
Total Suspended Solids	mg/L	Grab	100
Oil and Grease	mg/L	Grab	30
Total Nitrogen	mg/L	Calculate	Report
Total Phosphorus	mg/L	Grab	Report
Chemical Oxygen Demand (COD)	mg/L	Grab	120
pH	S.U.	Grab	9

Effluent standards for dissolved iron from 25 Pa. §95.2(4) will also be implemented.

#### Water Quality-Based Effluent Limitations (WQBELs)

A water quality analysis for Outfalls 002 & 003 using TMS was not performed because these are precipitation-based discharges and will not discharge under low stream-flow conditions.

#### TMDL Considerations

No specific TMDL is listed for the current reach of concern as discussed in TMDL section for Outfall 001.

#### Total Dissolved Solids (TDS) and Major Constituents Monitoring

Monitoring of TDS and its major constituents (i.e., sulfate, chloride, and bromide) will not be applied at Outfalls 002 & 003 since there are no salt and coal storage within the drainage areas of Outfalls 002 & 003.

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#### **Anti-Backsliding**

Section 402(o) of the Clean Water Act (CWA), enacted in the Water Quality Act of 1987, establishes anti-backsliding rules governing two situations. The first situation occurs when a permittee seeks to revise a Technology-Based effluent limitation based on BPJ to reflect a subsequently promulgated effluent guideline which is less stringent. The second situation addressed by Section 402(o) arises when a permittee seeks relaxation of an effluent limitation which is based upon a State treatment standard of water quality standard.

Previous limits can be used pursuant to EPA's anti-backsliding regulation 40 CFR 122.44 (*I*) Reissued permits. (1) Except as provided in paragraph (*I*)(2) of this section when a permit is renewed or reissued. Interim effluent limitations, standards or conditions must be at least as stringent as the final effluent limitations, standards, or conditions in the previous permit (unless the circumstances on which the previous permit was based have materially and substantially changed since the time the permit was issued and would constitute cause for permit modification or revocation and reissuance under §122.62). (2) In the case of effluent limitations established on the basis of Section 402(a)(1)(B) of the CWA, a permit may not be renewed, reissued, or modified on the basis of effluent guidelines promulgated under section 304(b) subsequent to the original issuance of such permit, to contain effluent limitations which are less stringent than the comparable effluent limitations in the previous permit.

The facility is not seeking to revise the previously permitted effluent limits.

#### Effluent Limitations and Monitoring Requirements for Outfalls 002 & 003

Effluent limits imposed at Outfalls 002 & 003 are the most stringent of TBELs, WQBELs, regulatory effluent standards and monitoring requirements as described in the sections above. The applicable requirements are summarized in Table 4. Since discharges from Outfalls 002 & 003 are precipitation-induced and non-continuous, grab sampling will be required for all parameters except flow, which should be estimated. The sampling frequencies will be applied per PAG-03 requirements.

Table 4. Monitoring Requirements for Outfalls 002 & 003

Parameter	Minimum	Average Monthly	Daily Maximum	Instantaneous Maximum	Sample Frequency	Sample Type
Flow (MGD)	-	-	Report	-	1/6 months	Estimated
рН	-	-	-	9.0	1/6 months	Grab
Total Suspended Solids (mg/L)	-	-	Report	-	1/6 months	Grab
Oil and Grease (mg/L)	-	-	Report	-	1/6 months	Grab
Dissolved Iron (mg/L)	-	-	Report	7.0	1/6 months	Grab
Total Nitrogen	-	-	Report	-	1/6 months	Grab
Total Phosphorus	-	-	Report	-	1/6 months	Grab
Chemical Oxygen Demand (COD)	-	-	Report	-	1/6 months	Grab

Development of Effluent Limitations						
Outfall No.	IMP 101		Design Flow (MGD)	0.0 (varied)		
Latitude	Not yet constru	cted	Longitude	Not yet constructed		
Wastewater Description:		Stormwater runoff associated with o	outdoor salt storage stock	piles		

#### **Overview**

IMP 101 receives stormwater from the outdoor salt piles and is directed to the Salt Pond. The discharge of the Salt Pond is directed to Pond 1. The outdoor salt piles are stored on a paved surface and are covered with geosynthetic tarps to the extent practical based on loading and unloading operations.

#### **Technology-Based Effluent Limitations (TBELs)**

IMP 101 effluent is comprised primarily of stormwater runoff from outdoor salt storage piles. There are no specific Federal Effluent Limitation Guidelines (ELGs) or state regulations requiring effluent limitations for this type of discharge (coal and salt storage).

Integral to the implementation of 25 Pa. Code § 95.10 is the principle that existing, authorized mass loadings of TDS are exempt from any treatment requirements under these provisions. Existing mass loadings of TDS up to and including the maximum daily discharge loading for any existing discharge, provided that the loading was authorized prior to August 21, 2010 are exempt. The Glasshouse Road Facility is a new facility, therefore, the requirements of 25 Pa. Code § 95.10(c) "New and expanding mass loadings of TDS not addressed in subsections (a) and (b) may not contain more than 2,000 <sup>mg</sup>/<sub>L</sub> of TDS on a monthly average, unless a variance is approved by the Department under this section."

Pursuant to 25 Pa. Code § 95.10(c), established a benchmark for TDS of 2,000 mg/L.

Pursuant to 25 Pa. Code § 95.2(2) oil and grease shall not exceed a daily average of 15  $^{mg}/_{L}$  and 30  $^{mg}/_{L}$  at any time, established a benchmark for Oil and Grease of 30  $^{mg}/_{L}$ .

Stormwater runoff from outdoor salt storage piles in IMP 101 drainage area falls under the category of PAG-03 Appendix K – Existing Salt Storage and Distribution Sites as displayed in Table 1 is a summary of parameters and benchmark values used for evaluating Best Management Practices (BMP).

Table 5. PAG-03 - Appendix K Minimum Monitoring Requirements

Discharge Parameter	Units	Sample Type	Benchmark Values
рН	S.U.	Grab	9.0
Total Suspended Solids	mg/L	Grab	100
Total Dissolved Solids	mg/L	Grab	Report
Chloride	mg/L	Grab	2,000
Total Nitrogen	mg/L	Calculate	Report
Total Phosphorus	mg/L	Grab	Report

Table 6. Monitoring Requirements for Outfalls 101

Parameter	Minimum	Average Monthly	Daily Maximum	Instantaneous Maximum	Sample Frequency	Sample Type
Flow (MGD)	-	-	Report	-	1/ month	Estimated
рН	-	-	-	9.0	1/ month	Grab
Total Suspended Solids (mg/L)	-	-	Report	-	1/ month	Grab
Oil and Grease (mg/L)	-	-	Report	-	1/ month	Grab
TDS (mg/L)	-	-	Report	-	1/ month	Grab
Chloride	-	-	Report	-	1/ month	Grab
Total Nitrogen	-	-	Report	-	1/ month	Grab
Total Phosphorus	-	-	Report	-	1/ month	Grab

# <u>Supplemental BMP Reporting</u>, Effective Period: <u>Permit Effective Date</u> through <u>Permit Expiration Date</u> Self-Inspection Report – Areas of Activity and Exposure

	Monitoring Requirements			
Parameter	Minimum Measurement Frequency	Required Sample Type		
Tarped Area, Build Pile	1/month	Each area estimated to the nearest		
Tarped Area, Working Pile	1/month	2,000 square feet.		
Un-tarped Area, Build Pile	1/month	·		
Un-tarped Area, Working Pile	1/month	The total area of the estimations		
Site Area Swept & Free of Residue	1/month	above shall equal the working area of		
Remaining Area Exhibiting Residue	1/month	the pad.		
Provide Supplemental Reports to the Department SWRO	Ongoing, 1/year	Reports shall be maintained on site throughout the year for review by the Department during inspections. A copy of the supplemental forms shall be provided to the Department SWRO on the anniversary of the Permit Effective Date.		

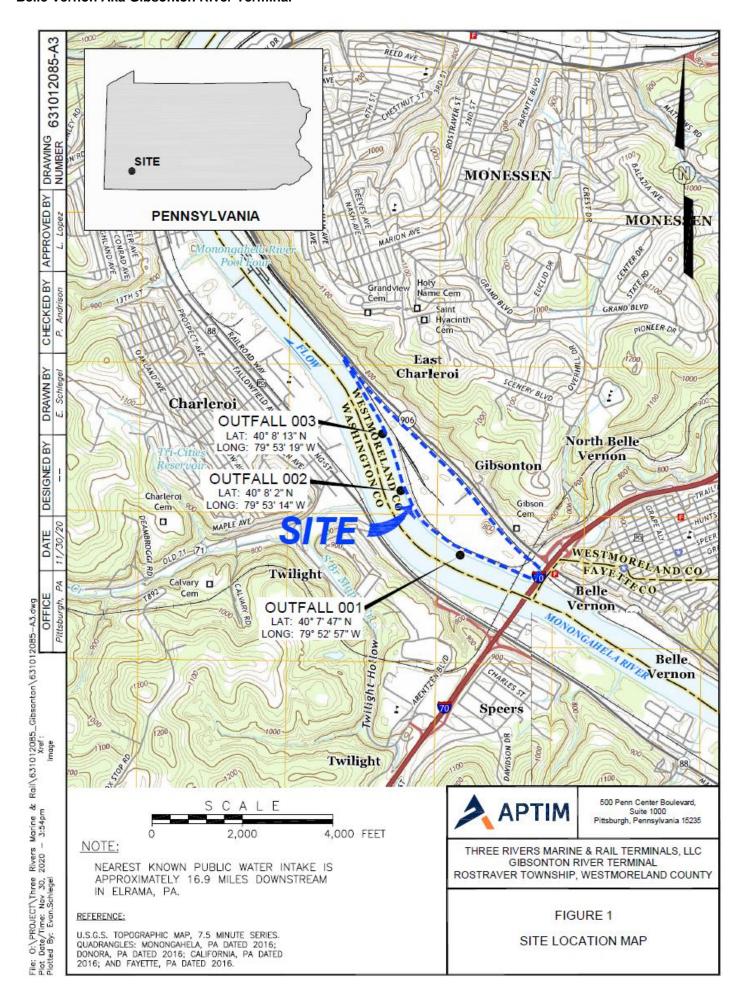
#### <u>Supplemental BMP Reporting</u>, Effective Period: <u>Permit Effective Date</u> through <u>Permit Expiration Date</u> Self-Inspection Report – BMP Checklist

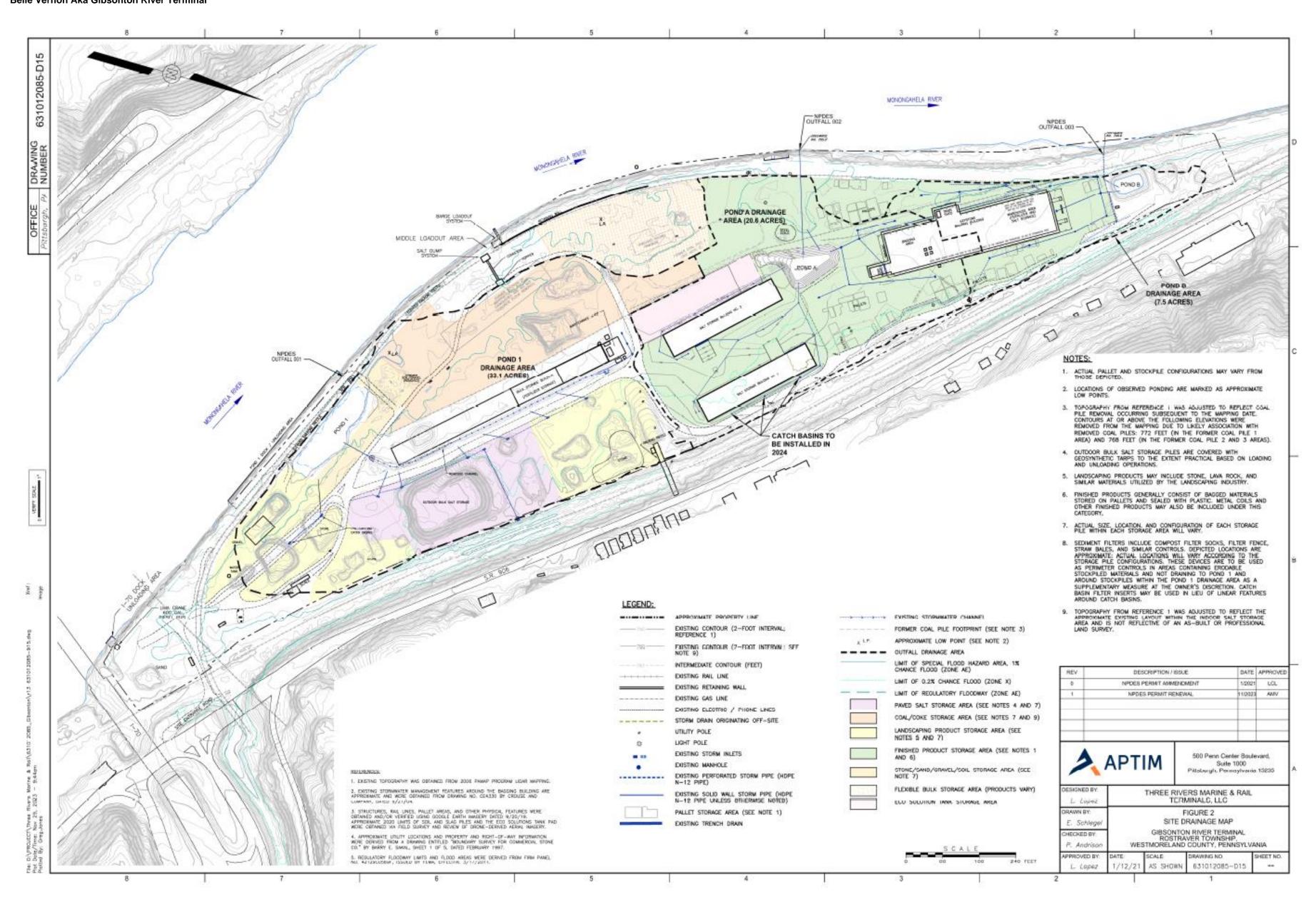
	Monitoring Requirements			
Items for Inspection	Minimum Measurement Frequency	Required Sample Type		
Inspect impervious pad for significant potholes, cracks or potential conduits for salt to transfer to the groundwater table.	1/month			
Inspect tarp integrity.	1/month	Estimate Horizontal Exposure of Tarped Area (ft²)		
Inspect for salt release from underneath tarp edges/through jersey barriers.	1/month	Estimate Horizontal Exposure of Un-Tarped Area (ft²)		
Inspect around the pad and surrounding area for salt residue.	1/month			
Provide Supplemental Reports to the Department SWRO	Ongoing, 1/year	Reports shall be maintained on site throughout the year for review by the Department during inspections. A copy of the supplemental forms shall be provided to the Department SWRO on the anniversary of the Permit Effective Date.		

Compliance Sampling Location: Field Walk

Other Comments: General housekeeping and site awareness shall be documented monthly.

**Site Plan Figures** 





# **Proposed Lined Pond**

