

Application Type Renewal
Facility Type Storm Water
Major / Minor Minor

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

Application No. PA0266001
APS ID 860924
Authorization ID 1451768

Applicant and Facility Information

Applicant Name	<u>Brenntag Northeast LLC</u>	Facility Name	<u>Brenntag Northeast Huller Ln Plant</u>
Applicant Address	<u>5083 Pottsville Pike</u> <u>Reading, PA 19605-9724</u>	Facility Address	<u>81 W Huller Lane</u> <u>Reading, PA 19605-9728</u>
Applicant Contact	<u>Richard Stanley</u>	Facility Contact	<u>Richard Stanley</u>
Applicant Phone	<u>(610) 916-9369</u>	Facility Phone	<u>(610) 916-9369</u>
Client ID	<u>69472</u>	Site ID	<u>248648</u>
SIC Code	<u>5169</u>	Municipality	<u>Ontelaunee Township</u>
SIC Description	<u>Wholesale Trade - Chemicals And Allied Products, Nec</u>	County	<u>Berks</u>
Date Application Received	<u>August 22, 2023</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>September 5, 2023</u>	If No, Reason	<u></u>
Purpose of Application	<u>NPDES discharge of stormwater associated with industrial activity.</u>		

Summary of Review

This is a renewal application for a NPDES individual permit for discharges of stormwater associated with industrial activity located in Ontelaunee Township, Berks County. See Figure 1 for a Site Layout map.

Facility Description, from GIF: Chemical distribution, logistics, and custom chemical services plant.

The facility's SIC code is 5169 (chemicals and allied products), which is not directly referenced in 40 CFR § 122.26(b)(14). DEP requested that the facility apply for a NPDES permit for discharges of stormwater associated with industrial activities in 2014 because of spill events that resulted in a DEP joint inspection and NOV. Since SIC Code 5169 is not listed in the PAG-03 NPDES General Permit for Discharges of Stormwater Associated with Industrial Activities (PAG-03), the facility had to apply for a NPDES Individual Permit for Discharges of Stormwater Associated with Industrial Activities.

SIC Code 2899 (Chemicals and Chemical Preparations, Not Elsewhere Classified) is directly referenced in 40 CFR 122.26 (b)(14). Facilities that fall under SIC Code 2899 and are eligible for the PAG-03 would be responsible for following the monitoring requirements and special conditions found in Appendix F of the PAG-03. While this facility packages and distributes chemicals and allied products, the assumption can be made that the potential pollutants would be comparable to a facility that manufactures chemicals and allied products. Therefore, it is recommended that the facility follow Appendix F of the PAG-03.

An application was received 8/22/2023. The application was deemed complete on 9/5/2023. Technical deficiencies were sent on 9/5/2023. The technical deficiencies were addressed on 9/14/2023.

Approve	Deny	Signatures	Date
X		<i>Jacob S. Rakowsky</i> Jacob S. Rakowsky, E.I.T. / Project Manager	10/24/2023
X		<i>Scott M. Arwood</i> Scott M. Arwood, P.E. / Environmental Engineer Manager	10/25/2023

Summary of Review

The facility discharges to the Schuylkill River (WWF, MF) through two representative outfalls: Outfalls 011 and 015. Outfall 011 is located near the western portion of the facility and receives discharge from Detention Basin #2 and Outfalls 012, 111, 112, 113, and 114. Outfall 015 is located near the southeastern portion of the facility and receives discharge from Outfalls 151, 152, 153, 154, 155, 156, 157, and 158.

Per the application, the PPC Plan was last updated in September 2019.

Part C permit conditions require semi-annual site inspections as well as implementation of BMPs and implementation of the facility PPC Plan. Given the BMPs in place, the discharge is not expected to have any measurable effect on the water quality of the receiving stream. There are no open violations for the client that would warrant withholding the issuance of this permit.

EPA waiver is in effect.

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.	011	Design Flow (MGD)	N/A
Latitude	40° 25' 5.14"	Longitude	-75° 56' 14.02"
Wastewater Description: Stormwater associated with industrial activities.			
Receiving Waters	Schuylkill River (WWF, MF)	Stream Code	00833
NHD Com ID	26000376	RMI	85.8
Drainage Area	642 sq. mi.	Yield (cfs/mi ²)	
Q ₇₋₁₀ Flow (cfs)	150	Q ₇₋₁₀ Basis	StreamStats
Watershed No.	3-C	Chapter 93 Class.	WWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	POLYCHLORINATED BIPHENYLS (PCBS), POLYCHLORINATED BIPHENYLS (PCBS), POLYCHLORINATED BIPHENYLS (PCBS), POLYCHLORINATED BIPHENYLS (PCBS), POLYCHLORINATED BIPHENYLS (PCBS)		
Source(s) of Impairment	SOURCE UNKNOWN, SOURCE UNKNOWN, SOURCE UNKNOWN, SOURCE UNKNOWN, SOURCE UNKNOWN		
TMDL Status	Final	Name	Schuylkill River PCB TMDL
Nearest Downstream Public Water Supply Intake	Pottstown Borough Water Authority		
PWS Waters	Schuylkill River	PWS Municipality	West Pottsgrove Twp, Montgomery County
PWS RMI	57.04	Distance from Outfall (mi)	~29

Drainage Area: 670,800 SF

% Impervious: 51%

Table 1. Outfall 011 Description of Materials/Activities in Drainage Area Exposed to Precipitation

Outfall No.	Description of Materials/Activities in Drainage Area Exposed to Precipitation
011*	Discharge from Detention Basin #2 (receives discharge from Outfalls 012, 111, 112, 113, and 114
012	Discharge from Detention Basin #2 (receives discharge from Outfall 013), access road, and the Food Grade Warehouse loading dock
111	Receives flow from the secondary containment of Acid Tank Farm #2; Treatment and Scrubber building; roof drainage from the rear of Warehouse #1, the west side of the patio, and the west side of the Solvent Drumming Room; impervious surface between Warehouses #1 and #2, and impervious surface between the Acid Tank Farms and Warehouse #1
112	Receives flow from the roof of Warehouse #2, the impervious surfaces to the northwest of Warehouse #2 (Acid Yard) and the impervious surface northwest of the Food Grade Warehouse
113	Roof drainage from the Food Grade Warehouse
114	Flows from stormwater inlet at graded acid loading area behind Acid Tank Farm #1 into swale that leads to Detention Basin #2

*Outfall 011 is representative of Outfalls 012, 111, 112, 113, and 114.

Table 2. Outfall 011 Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater

Outfall No.	Outfall 011 Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater
011	Treatment via a series of detention/retention basins and grass-lined swales
012	Treatment via Detention Basin #2
111	None listed in application
112	None listed in application
113	None listed in application
114	None listed in application

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	015	Design Flow (MGD)	N/A
Latitude	40° 25' 2.20"	Longitude	-75° 56' 0.30"
Wastewater Description: Stormwater associated with industrial activities.			
Receiving Waters	Schuylkill River (WWF, MF)	Stream Code	00833
NHD Com ID	26000376	RMI	85.8
Drainage Area	642 sq. mi.	Yield (cfs/mi ²)	
Q ₇₋₁₀ Flow (cfs)	150	Q ₇₋₁₀ Basis	StreamStats
Elevation (ft)		Slope (ft/ft)	
Watershed No.	3-C	Chapter 93 Class.	WWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	POLYCHLORINATED BIPHENYLS (PCBS), POLYCHLORINATED BIPHENYLS (PCBS), POLYCHLORINATED BIPHENYLS (PCBS), POLYCHLORINATED BIPHENYLS (PCBS), POLYCHLORINATED BIPHENYLS (PCBS)		
Source(s) of Impairment	SOURCE UNKNOWN, SOURCE UNKNOWN, SOURCE UNKNOWN, SOURCE UNKNOWN, SOURCE UNKNOWN		
TMDL Status	Final	Name	Schuylkill River PCB TMDL
Nearest Downstream Public Water Supply Intake	Pottstown Borough Water Authority		
PWS Waters	Schuylkill River	PWS Municipality	West Pottsgrove Twp, Montgomery County
PWS RMI	57.04	Distance from Outfall (mi)	~29

Drainage Area: 1,077,000 SF

% Impervious: 68%

Table 3. Outfall 015 Description of Materials/Activities in Drainage Area Exposed to Precipitation

Outfall No.	Description of Materials/Activities in Drainage Area Exposed to Precipitation
015*	Receives discharge from Outfalls 151, 152, 153, 154, 155, 156, 157 and 157 (and 158, if applicable)
151	Bulk railcar and tank truck storage and transfer operations; non-bulk drum and tote storage areas
152	Discharge from Detention Basin #1; bulk railcar storage and transfer
153	Surface runoff from the employee parking lot in front of the Food Grade/Office Building at the southern end of the facility
154	Receives flow from the front (southeast) of the roof of Warehouse #1, the impervious asphalt in front of the loading dock, and the pit beneath the scale located to southeast of Warehouse #1.
155	Receives surface flow from stormwater inlet near the main personnel entrance to the facility and a portion of the roof of the Office Building
156	Discharge from Detention Basin #1 (receives discharge from Outfalls 151 and 152)
157	Overflow from Detention Basin #3 (receives discharge from Outfall 153), access road, and Warehouse #1 loading dock
158	Stormwater discharge from DEF building and secondary containment (under tent)

*Outfall 015 is representative of Outfalls 151, 152, 153, 154, 155, 156, 157, and 158.

Table 4. Outfall 015 Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater

Outfall No.	Outfall 011 Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater
011	Treatment via a series of detention/retention basins and grass-lined swales
151	None listed in application
152	None listed in application
153	None listed in application
154	None listed in application
155	None listed in application
156	Treatment via Detention Basin #1 and grass-lined swale
157	Treatment via Detention Basin #3
158	Treatment via Detention Basin #1

Compliance History	
Summary of DMRs:	A summary of available eDMR data can be found in Table 5 and Table 6 below.
Summary of Inspections:	<p>An administrative/file review was conducted 7/14/ that resulted in a violation for failure to submit a NPDES renewal application on time. The violation has since been addressed. A compliance evaluation inspection was conducted at the facility on 8/19/2021. No violations were noted.</p> <p>An incident response inspection was conducted on 11/13/2019. The incident resulted in a violation that has since been addressed.</p>

The client currently has 31 open violations with DEP Southcentral Region Storage Tanks Program that will need to be addressed prior to issuing the final permit.

Table 5. Recent eDMR data for Outfall 011

Outfall 011	2nd Half 2022	1st Half 2022	2nd Half 2021	1st Half 2021
COD	28	25	25	66
pH	7.57	8.35	8.53	7.39
TSS	19	2	2	4
Nitrate-Nitrite as N	2.1	2.31	0.1	1.23
Total Phosphorus	0.24	0.16	0.22	0.12
Total Iron	0.52	0.08	0.06	0.17
Total Lead	0.01	0.01	0.01	0.01
Total Zinc	0.018	0.005	0.006	0.096
Total Aluminum	0.32	0.02	0.02	0.08

Table 6. Recent eDMR data for Outfall 015

Outfall 011	2nd Half 2022	1st Half 2022	2nd Half 2021	1st Half 2021
COD	25	25	25	85
pH	7.63	8.4	8.52	7.42
TSS	20	3	1	24
Nitrate-Nitrite as N	2.09	2.31	0.1	1.34
Total Phosphorus	0.24	0.15	0.23	0.14
Total Iron	0.55	0.07	0.06	0.18
Total Lead	0.01	0.01	0.01	0.01
Total Zinc	0.013	0.005	0.005	0.093
Total Aluminum	0.33	0.02	0.02	0.08

Proposed Effluent Limitations and Monitoring Requirements

Based on the description of the facility's activities, the **applicable PAG-03** NPDES Permit for Discharges of Stormwater Associated with Industrial Activity appendix is **Appendix F**, which would include the following monitoring requirements:

Table 7. PAG-03, Appendix F Requirements

Parameter	Monitoring Requirements ^{(1),(2)}		Benchmark Values
	Minimum Measurement Frequency	Sample Type	
Total Nitrogen (mg/L) ⁽³⁾	1 / 6 months	Calculation	XXX
Total Phosphorus (mg/L)	1 / 6 months	Grab	XXX
pH (S.U.)	1 / 6 months	Grab	9.0
Chemical Oxygen Demand (COD) (mg/L)	1 / 6 months	Grab	120
Total Suspended Solids (TSS) (mg/L)	1 / 6 months	Grab	100
Nitrate + Nitrite-Nitrogen (mg/L)	1 / 6 months	Grab	3.0
Total Lead (mg/L)	1 / 6 months	Grab	XXX
Total Zinc (mg/L)	1 / 6 months	Grab	XXX
Total Iron (mg/L)	1 / 6 months	Grab	XXX
Total Aluminum (mg/L)	1 / 6 months	Grab	XXX

Footnotes

- (1) In accordance with Part C V.C, the permittee shall conduct additional monitoring if specified by DEP in the letter authorizing permit coverage or other correspondence.
- (2) This is the minimum number of sampling events required. Permittees may optionally perform additional sampling.
- (3) Total Nitrogen is the sum of Total Kjeldahl-N (TKN) plus Nitrite-Nitrate as N (NO₂+NO₃-N), where TKN and NO₂+NO₃-N are measured in the same sample.

Table 8. Proposed Monitoring Requirements

Parameter	Effluent Limitations				Monitoring Requirements	
	Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Total Nitrogen (mg/L)	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
pH (S.U.)	XXX	XXX	Report	XXX	1/6 months	Grab
COD (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
TSS (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Nitrate + Nitrite-Nitrogen (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Lead (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Zinc (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Aluminum (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab

All required parameters from PAG-03 Appendix F are included in this permit.

Benchmarks for TSS of 100 mg/L, pH of 9.0 S.U., COD of 120 mg/L, and Nitrate + Nitrite-Nitrogen of 3.0 mg/L are included, which is typical of the monitoring requirements for PAG-03 Appendices.

The BMPs from Appendix F are included.

The requirement to submit an Annual Report is included.

The requirement for routine inspections on a semiannual basis is included.

Antidegradation (93.4):

The applicant is not proposing a new discharge to a High Quality (HQ) or Exceptional Value (EV) water, so Module 1 (Anti Degradation Module) was not included with the application

The effluent limits for this discharge have been developed to ensure that existing instream water uses and the level of water quality necessary to protect the existing uses are maintained and protected. Best Management Practices will ensure that the existing instream uses are protected. No Exceptional Value Waters are impacted by this discharge.

The designated use of the receiving waters are as follows:

Schuylkill River (WWF, MF)



Figure 1. Site Layout