pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southcentral Regional Office
CLEAN WATER PROGRAM

Application Type	**New**	Application No.	**PA0266477**
Facility Type	**Storm Water**	APS ID	**18038**
Major / Minor	**Minor**	Authorization ID	**1167727**

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

Applicant and Facility Information

Applicant Name	**American Rock Salt Company. LLC (ARSC)**	Facility Name	**American Rock Salt Co. LLC - Reading Salt Storage Facility**
Applicant Address	5520 Rt 63 PO Box 190 Mt Morris, NY 14510	Facility Address	1601 North Sixth Street Reading, PA 19601
Applicant Contact	Sharon Hinkson	Facility Contact	Chip Pascuzzo
Applicant Phone	(585) 991-6851	Facility Phone	(585) 749-6700
Client ID	112334	Site ID	244454
SIC Code	5169	Municipality	Reading City
SIC Description	Wholesale Trade - Chemicals And Allied Products, Nec	County	Berks
Date Application Received	December 22, 2016	EPA Waived?	Yes
Date Application Accepted	July 3, 2017	If No, Reason	
Date Amendment Received	January 28, 2019		
Purpose of Application	Issuance of an Individual NPDES Permit to discharge stormwater associated with industrial activities.		

Summary of Review

This is an application for an individual NPDES permit for discharge of stormwater from a salt storage facility.
The facility is currently covered under NPDES Permit No PAR323513, which will be replaced by this permit upon issuance.
NPDES Permit number PAR323513 was issued new on 5/19/2006 with an effective date of 6/1/2006.
(Note: PAR323513 replaced NPDES Permit No PA0084387 which expired 8/31/2006, at that time)
A PAG-03 NOI for renewal was received on December 20, 2010. Due to high levels of the sampling parameters, the Department decided to change the facility to an individual NPDES permit for discharges of stormwater associated with Industrial Activities.

On September 30, 2016, DEP mailed letters to all permittees that currently have coverage under the PAG-03 General Permit to explain how the September 24, 2016 final, reissued NPDES PAG-03 would affect the permittee. Both the letter and the reissued PAG-03 General Permit noted that if the permittee determines that they are no longer eligible, or otherwise determines they will be unable to comply with the 2016 General Permit, they should submit an application for an individual NPDES permit by December 23, 2016.

A new application for an individual NPDES permit for discharges of stormwater associated with industrial activities was received on December 22, 2016 with an incomplete Module 1 and no Evidence of Newspaper Notification per the cover letter.
On January 18, 2017, the Department received Evidence of Newspaper Publication.
On April 3, 2017, the Department received a completed Module 1 that included sample results for all the required parameters.
On July 3, 2017, the Department ended the Completeness review.

Approve	Deny	Signatures	Date
x		/s/ Brenda J. Fruchtl, P.G. / Licensed Professional Geologist	August 5, 2019
x		/s/ Scott M. Arwood, P.E. / Environmental Engineer Manager	August 7, 2019

Summary of Review

On January 28, 2019, an amendment was received from ARSC to change the location of Outfall 001. While reviewing the documents and plans for the Reading site, ARSC noted the current Outfall 001 sampling site does not appear to take into account stormwater runoff from the pad expansion site. The proposed sampling location does appear to represent the stormwater runoff from the entire site. They included revised tables from the Industrial Stormwater Application to provide information about the proposed new location for Outfall 001 as well as Module 1 – Stormwater (from the Industrial Wastewater Application).

On July 2, 2019, I sent email to confirm no additional updates before starting my review. I also requested a map showing where the stormwater channel ultimately discharges; and provide the name of the received water for the stormwater channel.

On July 3, 2019, I received a response stating there were no other updates / changes; and written clarification on the location of the discharge.

The American Rock Salt Company LLC (ARSC) facility is designed to store approximately 120,000 tons of rock salt that is used in the northeastern United States during winter months for deicing highways. The salt arrives via truck or railcar and is stored until customer delivery is required. The salt is stacked 35 feet high in a continuous pile to accommodate staged tarping as the pile progresses. In general, salt is delivered to the stockpile over a 4-month period until enough has been accumulated to fulfill seasonal customer orders. Once the pile is established, ARSC contracts with a company that covers the piles with waterproof tarps. Once fully covered, the tarp system allows for near total coverage of the rock pile, thus substantially reducing the potential for rock salt constituent chemicals (primarily TDS) to be released during precipitation events. While the salt pile is being depleted filling customer orders, ARSC uncovers enough of the pile to meet current demand and then recovers the pile while no loads are being filled.

The salt is stored on a 4-acre sealed asphalt pad that features a continuous 6” curb (bound to the asphalt paving) around the pad perimeter. Jersey barriers are in place on the northern end to contain the salt.

The storage pad discharges to catch basins to the north and east and into the Norfolk Southern water channel via Outfall 001 that ultimately discharges to the City of Reading’s stormwater channel that discharges to the Schuylkill River.

The facility is not currently equipped with any means to control stormwater runoff from the salt stockpile; however, ARSC is exploring options to see if the construction of a containment pond is feasible.

A process flow diagram for both the salt and stormwater is attached. See **Figure 1**.

A Site Map showing the location of the old Outfall 001 and the new Outfall 001, the catch basins, the continuous 6” high bituminous curb, and other details is attached. See **Figure 2**.

USGS Topographic map showing the location of the facility is attached. See **Figure 3**.

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 (new location)	Design Flow (MGD)	Stormwater only
Latitude	40º 21' 39.06"	Longitude	-75º 55' 25.16"
Wastewater Description:	Stormwater Associated with Industrial Activities		
Receiving Waters	Schuylkill River (WWF, MF)	Stream Code	00833
NHD Com ID	133228731	RMI	78.2
Drainage Area	665 sq. miles	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	162	Q_{7-10} Basis	USGS 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)		
Source(s) of Impairment	SOURCE UNKNOWN, SOURCE UNKNOWN, SOURCE UNKNOWN, SOURCE UNKNOWN		
TMDL Status	Final	Name	Schuylkill River PCB TMDL
Nearest Downstream Public Water Supply Intake	Pottstown Borough Authority		
PWS Waters	Schuylkill River	Intake Location	West Pottsgrove Twp, Mongomery County
PWS RMI	57	Distance from Outfall (mi)	22

Changes Since Last Permit Issuance: Starting in December 2018, Outfall 001 (sampling site) was relocated to take into account stormwater runoff from the pad expansion site.

Additional Information:

- Outfall 001 drains 152,700 sq ft of 100% impervious area.
- Materials/Activities in drainage area include rock salt unloading, loading and storage.
- BMPs in drainage area to control pollutants in stormwater include the following: a plastic cover is maintained on the salt pile, the perimeter of the stockpile cover is sealed to the pad with ballast where needed to prevent washout of salt from the stockpile, the perimeter of the stockpile pad is surrounded by an asphalt berm to contain the salt and stormwater runoff (directing it to the catch basins), stage tarping pile, and sweeping up spilled salt.

Outfall 001 (new) discharges into the Norfolk Southern water channel (like the old Outfall 001 location), which discharges in the City of Reading stormwater channel, which discharges into the Schuylkill River.

Note: Old Outfall 001 was located at 40°21'28" N and 76°56'23" W

StreamStats Report used for determining drainage area and Q7-10 Flow is attached. See **Figure 4**.

Compliance History

April 7, 2016 Inspection. PADEP listed violations on the NPDES Compliance Inspection (date of report 7/19/16)
Facility is in violation of general BMPs outlined in PAG-3 permit, Appendix K.III.A&B: Facilities with large salt piles, facilities with salt distribution salt piles. Facilities are required to cover or enclose materials at all times except when receiving salt, building the stockpile or loading out to customers and then only the working face may be exposed. Discharging contaminated stormwater runoff into the stormwater collection and conveyance system to the Schuylkill River, waters of the Commonwealth, is in violation of Sections 301 & 307 of The Clean Streams Law

July 20, 2016 NOV. PADEP issued a NOV to ARSC Reading for April 7, 2016 Inspection.
The NOV was for violations noted on April 7, 2016 including: discharge of contaminated stormwater runoff from the salt pile in the stormwater collection and conveyance system to the Schuylkill River; facility staff failed to follow specific BMPs for stormwater associated with salt distribution piles and results from a grab sample collected from the stormwater discharge at the facility included elevated levels for Osmotic Pressure, Total Dissolve Solids, Total Suspended Solids and Free Cyanide. The NOV requested they submit a full report to include circumstances leading to the violations along with any additional cleanup or remediation activities and preventative measures they are planning should be outlined with an implementation schedule. Submit the report within 14 days of the letter.

August 12, 2016 Received Response to July 20, 2016 NOV.

December 29, 2017 COA. COA was signed for both the ARSC York facility and ARSC Reading Facility that until the Department issues new Individual NPDES Permits for the ARSCO Reading Stockpile, the terms and conditions of the existing General NPDES Permit and Appendix K (Existing Salt Storage and Distribution Sites) of the Departments PAG-03 NPDES Permit for Discharges of Stormwater Associated with Industrial Activities, as renewed on September 24, 2016, are administratively extended with the execution of the Consent Order and Agreement. The reissued PAG-03 General Permit described in this document supersedes the PAG-03 General Permit that was issued on December 5, 2010. (see **Attachment A** for a list of the corrective actions)

January 31, 2018 Received Sampling Plan for Outfall 001 in response to December 29, 2017 COA. (see **Attachment B**)

January 18, 2018 Inspection. PADEP listed violations on the NPDES Compliance Inspection Report (date of report 1/24/18)
Facility is in violation of sector-specific BMPs outlined in PAG-3 permit, Appendix K.IV.A.1 & 2: Existing Salt Storage and Distribution Sites: The permittee shall store salt stockpile and conduct loading unloading on a synthetic impermeable surface. Stockpiles must be covered by materials including but not limited to tarpaulin, polyethylene, polypropylene or Hypalon. I recommend removing or properly storing salt on the two piles south of the main stockpile

January 25, 2018 Inspection. PADEP listed no violations on the NPDES Compliance Inspection Report (date of report 2/2/2018)
The main salt pile appears to be securely covered except the working face.

February 6, 2018 NOV. PADEP issued a Notice of Violation (NOV) to ARSC Reading for January 18, 2018 Inspection.
On January 18, 2018, the Department conducted a stormwater inspection at the ARSC Reading facility. During the inspection, the Department documented that the facility staff failed to follow specific BMPs for salt storage and distribution sites – failure to store salt stockpile and conduct loading/unloading on a synthetic impermeable surface and properly cover the stockpile in violation of Appendix K.IV.A of the PAG-03 permit. The NOV requested they submit a full report to include circumstances leading to the violations along with any additional cleanup or remediation activities and preventative measures they are planning should be outlined with an implementation schedule. Submit the report within 14 days of the letter.

March 2, 2018 Received Response to February 6, 2018 NOV.

August 30, 2018 Inspection. PADEP listed violations on the NPDES Compliance Inspection Report (date of report 9/18/18)
Facility failed to properly cover the salt stockpile as required by NPDES Permit No. PAR323513 Appendix K. IV. A. 2. I recommend consolidating salt piles along Railroad St. with the main stockpile. I recommend covering the stockpile within 30 days

November 5, 2018 Inspection. PADEP listed violations on the NPDES Compliance Inspection Report (date of report 11/07/2018).
Discharge of contaminated stormwater runoff into stormwater collection and to the Schuylkill River, waters of the Commonwealth, is a violation of Sections 301 & 307 of The Clean Streams Law

November 8, 2018 Email from ARSC proposing new sampling location for Outfall 001.

January 22, 2019 Received updated application to indicate new sampling location for Outfall 001.

April 10, 2019 Inspection. PADEP listed no violations on the NPDES Compliance Inspection Report (date of report 4/11/19).
I am requesting a written response within 5 days of outlining ARSCO's plan to build and cover the stockpile in accordance with the PAG-03 NPDES General Permit, Appendix K. Please include an estimated time frame
Stockpile is staged in area of the belt conveyer. Approximate stockpile dimensions during inspection are 50 M Length X 10 M Width X 5 M Height. The stockpile is uncovered.
Storm drains under the belt conveyor are covered with metal plates. No salt observed around other storage pad storm drains.
During the inspection, one load was removed from the pile by dump truck. No active loading onto the stockpile.

April 15, 2019 Received Response to Inspection Report. Response to April 10, 2019 NPDES Compliance Inspection Report.

May 21, 2019 Inspection. PADEP listed no violations on the NPDES Compliance Inspection Report (date of report 5/21/19).
During the inspection approximately ½ - ¾ of the salt stockpile was covered. A section of the uncovered portion of the stockpile has been eroded near the base of the pile due to recent heavy rains (Image 1). To help reduce the amount of surface water coming in contact with the stockpile, a trench and soil berm was constructed on the southern side of the pile (Image 2). Mr. Dronick stated that he is considering building a wider trench and a pipe to direct water to nearby stormwater drain. Please provide notice to the Department before making changes to the stormwater collection system. Be advised that a permit from Berks County or amendment to your stormwater NPDES permit application may be necessary.
Stormwater drains surrounding the stockpile were observed. Drains were covered with rubber matting. A drain near the southeastern face of the pile was partially covered with evidence of brine runoff (Image 3). Drain was located near salt loading station. Mr. Dronick stated that all drains under pile are also blocked.
Mr. Dronick stated that the tarping contractor hired by ARSC would return next week to finish covering the pile.
Recommendations:
-Ensure the entirety of the stockpile, with the exception of the working face, remains properly covered at all times.
-Continue to monitor surrounding stormwater drains to confirm they are completely blocked.

June 20, 2019 Inspection. PADEP listed violations on the NPDES Compliance Inspection Report (date of report 6/28/19).
Discharge of industrial wastewater from the separate, uncovered salt pile to stormwater collection and to the Schuylkill River is a violation of Section 301 and 307 of the Clean Streams Law. I recommend building and covering the stockpile in accordance with BMPs outlined in the PAG-03 General Permit, Appendix K.
I am requesting a written update on site conditions in relation to Appendix K BMPs within 7 days.

Summary of Inspections from 1/1/2006 through 7/2/2019:

PERMIT	FACILITY NAME	PF KIND	COUNTY	MUNICIPALITY	INSPECTED DATE	INSP TYPE	INSPECTION RESULT DESC	# OF VIOLATIONS
PAR323513	ARSC - READING SALT STORAGE FACILITY	Stormwater-Industrial	Berks	Reading City	01/09/2006	Routine/Complete Inspection	No Violations Noted	0
PAR323513	ARSC - READING SALT STORAGE FACILITY	Stormwater-Industrial	Berks	Reading City	06/14/2006	Routine/Complete Inspection	No Violations Noted	0
PAR323513	ARSC - READING SALT STORAGE FACILITY	Stormwater-Industrial	Berks	Reading City	12/29/2011	Storm Water Industrial-Non-Sampling	No Violations Noted	0
PAR323513	ARSC - READING SALT STORAGE FACILITY	Stormwater-Industrial	Berks	Reading City	04/07/2016	Routine/Partial Inspection	Violation(s) Noted	2
PAR323513	ARSC - READING SALT STORAGE FACILITY	Stormwater-Industrial	Berks	Reading City	01/18/2018	Routine/Partial Inspection	Violation(s) Noted	1
PAR323513	ARSC - READING SALT STORAGE FACILITY	Stormwater-Industrial	Berks	Reading City	01/25/2018	Follow-up Inspection	No Violations Noted	0
PAR323513	ARSC - READING SALT STORAGE FACILITY	Stormwater-Industrial	Berks	Reading City	08/30/2018	Routine/Partial Inspection	Violation(s) Noted	1
PAR323513	ARSC - READING SALT STORAGE FACILITY	Stormwater-Industrial	Berks	Reading City	11/05/2018	Routine/Partial Inspection	Violation(s) Noted	1
PAR323513	ARSC - READING SALT STORAGE FACILITY	Stormwater-Industrial	Berks	Reading City	04/10/2019	Routine/Partial Inspection	No Violations Noted	0
PAR323513	ARSC - READING SALT STORAGE FACILITY	Stormwater-Industrial	Berks	Reading City	05/21/2019	Routine/Partial Inspection	No Violations Noted	0
PAR323513	ARSC - READING SALT STORAGE FACILITY	Stormwater-Industrial	Berks	Reading City	06/20/2019	Routine/Partial Inspection	Violation(s) Noted	1

Summary of Violations from 1/1/2005 through 7/2/2019:

PERMIT	FACILITY	VIOLATION DATE	VIOLATION TYPE	VIOLATION TYPE DESC	RESOLVED DATE	INSPECTED DATE	INSP TYPE
PAR323513	ARSC - READING SALT STORAGE FACILITY	07/12/2000	92.41DMRVIO	Administrative review of DMR reveals violation(s).	07/20/2000	07/12/2000	Administrative/File Review
PAR323513	ARSC - READING SALT STORAGE FACILITY	04/07/2016	CSL301	CSL - Unauthorized, unpermitted discharge of industrial wastes to waters of the Commonwealth	08/12/2016	04/07/2016	Routine/Partial Inspection
PAR323513	ARSC - READING SALT STORAGE FACILITY	04/07/2016	91.34(A)	CSL - Failure to take necessary measures to prevent pollutants from reaching waters of the Commonwealth	08/12/2016	04/07/2016	Routine/Partial Inspection
PAR323513	ARSC - READING SALT STORAGE FACILITY	01/18/2018	92A.41(A)1	NPDES - Non-compliance with an issued permit, not classified by any other code		01/18/2018	Routine/Partial Inspection
PAR323513	ARSC - READING SALT STORAGE FACILITY	08/30/2018	92A.41(A)1	NPDES - Non-compliance with an issued permit, not classified by any other code		08/30/2018	Routine/Partial Inspection
PAR323513	ARSC - READING SALT STORAGE FACILITY	11/05/2018	CSL301	CSL - Unauthorized, unpermitted discharge of industrial wastes to waters of the Commonwealth		11/05/2018	Routine/Partial Inspection
PAR323513	ARSC - READING SALT STORAGE FACILITY	06/20/2019	CSL301	CSL - Unauthorized, unpermitted discharge of industrial wastes to waters of the Commonwealth		06/20/2019	Routine/Partial Inspection

DMR Summary

NPDES Permit No PAR323513. Effective June 1, 2006 through May 31, 2011. Applicable Appendix: K, Salt Storage and Distribution Piles.
The coverage under the PAG-03 General Permit was administratively extended until the issuance of an individual NPDES Permit for discharges of stormwater associated with industrial activity, NPDES Permit No PA0266477.

History of monitoring requirements under the PAG-03 General Permit, Appendix K, Salt Storage and Distribution Piles:

1. The **PAG-03 General Permit was effective June 5, 2004 and expired June 4, 2009** (at time the coverage was first approved)
   - The monitoring requirements for Appendix K.2 (Salt Distribution Stockpiles) included obtaining a grab sample 1/6 months for the following discharge parameters: **Total Suspended Solids (TSS), Oil and Grease, Total Dissolved Solids (TDS), Osmotic Pressure, Free Cyanide, and pH.**

2. The **PAG-03 General Permit was extended effective June 5, 2009 and expired June 4, 2010**.
   - The monitoring requirements for Appendix K.2 (Salt Distribution Stockpiles) remained unchanged.

3. The **PAG-03 General Permit was renewed effective December 5, 2010 and expired December 4, 2015**.
   - The monitoring requirements for Appendix K.2 (Salt Distribution Stockpiles) remained unchanged.

4. The **PAG-03 General Permit was reissued effective September 24, 2016 and expires September 23, 2021**.
   - The monitoring requirements for Appendix K (Existing Salt Storage and Distribution Sites) included obtaining a grab sample 1/6 months for the following discharge parameters: **Total Suspended Solids (TSS), Total Dissolved Solids (TDS), pH, and Chloride.** *(A change from previous Appendix K parameters)*
   - The monitoring requirements included new **Benchmark Values for both TSS (100 mg/L) and Chloride (2000 mg/L).**

ARSC Reading Stockpile Sampling Plan was received January 31, 2018 to address an item in the December 29, 2017 COA.
The sampling plan included monthly sampling for the following discharge parameters: Total Suspended Solids (TSS), Total Dissolved Solids (TDS), pH, and Chloride.

DMR Data for both the existing Outfall 001 (from July 1, 2017 to July 31, 2019) and *new/proposed Outfall 001 (from December 2018 to May 2019)*
Note: The reissued PAG-03 General Permits and the Sampling Plan (beginning January 31, 2018) explains the different discharge parameters listed in the DMR Data Summaries below.

Parameter	JUN-19[1]	MAY-19	*MAY-19	APR-19	*APR-19	MAR-19[1]	MAR-19	*MAR-19	FEB-19	*FEB-19	JAN-19
pH (S.U.) Daily Maximum	7.35	7.07	*6.94*	7.35	*7.75*	8.2	8.12	*7.18*	7.6	*6.2*	8.2
TSS (mg/L) Daily Maximum	**684**	**207**	*57*	**410**	***274***	**616**	**474**	*90*	**616**	***552***	**128**
Total Dissolved Solids (mg/L) Daily Maximum	241000	64200	*2570*	37200	*12700*	185000	16900	*12800*	101000	*151000*	18500
Chloride (mg/L) Daily Maximum	**289000**	**82800**	*995*	**22700**	***13700***	**19800**	**10400**	***9240***	**19800**	***141000***	**13300**

Parameter	*JAN-19	DEC-18[1]	DEC-18	*DEC-18	NOV-18	OCT-18[2]	SEP-18[1]	SEP-18	AUG-18	JUL-18	JUN-18[1]
pH (S.U.) Daily Maximum	*7.7*	7.3	7.14	*7.14*	7.3		7.8	6.6	7.1	7.8	8.5
TSS (mg/L) Daily Maximum	*36*	**249**	**249**	***153***	**128**		**596**	**596**	**186**	**212**	**2610**
Total Dissolved Solids (mg/L) Daily Maximum	*19600*	298000	298000	*304000*	19110		304800	304800	6640	17090	45100
Chloride (mg/L) Daily Maximum	***10600***	**109000**	**109000**	***65900***	**33000**		**190000**	**190000**	**6000**	**12000**	**26000**

Parameter	JUN-18	MAY-18	APR-18	MAR-18[1]	FEB-18	JAN-18	DEC-17[1]	NOV-17	OCT-17	SEP-17[1]	AUG-17
pH (S.U.) Daily Maximum	7.0	7.3		6.5	6.5		6.5			6.5	
TSS (mg/L) Daily Maximum	**187**	**280**		**1672**	**466**		**510**			**510**	
Total Dissolved Solids (mg/L) Daily Maximum	45100	35350		190700	93840		258700			258700	
Chloride (mg/L) Daily Maximum	**20000**	**26000**		**55000**	**55000**		**180000**			**180000**	

Parameter	MAR – 17[3]		APR-16[4]	OCT-15	APR-15	SEP-14	APR-14	DEC-13	APR-13	APR-12	SEP-10
pH (S.U.) Daily Maximum	5.8		5.9	6.2	6.0	6.8	7.2	6.7	6.2	6.6	6.0
TSS (mg/L) Daily Maximum	**3650**		916	1292	144	204	56	13	346	48	336
Total Dissolved Solids (mg/L) Daily Maximum	192300		51292	198840	29256	66590	36690	10330	68936	112870	50396
Chloride (mg/L) Daily Maximum	**160000**										
Free Cyanide (mg/L)	0.14		0.024	0.289	0.019	0.008	0.321	0.004	0.244	0.172	0.080
Osmotic Pressure (mOs/kgH_2O)	6100		1634	6340	908	2060	1080	308	2200	3840	1550
Nitrate (mg/L)	<200										
Nitrite (mg/L)	<20										
TKN (mg/L)	<1										
Oil and Grease (mg/L)	19		12	<5	<5	9	<5	<5	<5	<5	<5
BOD5 (mg/L)	48										
COD (mg/L)	7600										
Total Nitrogen (mg/L)	<221										
Total Phosphorus (mg/L)	0.40										

**New Outfall 001*. *(sampling began December 2018, replaces existing Outfall 001)*
[1]Quarterly eDMRs *(Note: 9/24/2016 reissued PAG-03 NPDES General Permit Appendix K minimal sampling frequency was 1/6 months)*
[2]No monthly sample grabbed October 2018.
[3]Stormwater Sample Results from the Revised NPDES Module 1 – Stormwater received 4/2/2017. Sample taken March 1, 2017.
[4]Stormwater Sample Results from the NPDES Module 1 – Stormwater received 12/22/2016 as part of application. Sample taken April 2016.
BOLD = Benchmark for TSS or Chloride (listed in Appendix K of the September 24, 2016 reissued PAG-03 General Permit) was exceeded.

Development of Effluent Limitations

Outfall No.	001	**Design Flow (MGD)**	_0 (stormwater only)___
Latitude	40º 21' 39.06"	**Longitude**	-75º 55' 25.16"

Wastewater Description: Stormwater

Chemical Additives: Sodium Ferrocyanide is added at the mine as an anticaking agent for the salt.

Based on the previous sample results from Outfall 001, the following parameters should be sampled at new Outfall 001 monthly during a qualifying storm event:
Flow, pH, Chemical Oxygen Demand (COD), Total Suspended Solids (TSS), Total Dissolved Solids (TDS), Osmotic Pressure, Free Cyanide, Oil and Grease, and Chloride.

Results should be reported monthly via eDMR

This permit establishes effluent limitations through the implementation of best management practices (BMPs), as specified Part C II, to reduce the discharge of pollutants in stormwater discharges associated with industrial activity.

During this permit cycle, neither limits nor benchmarks are being incorporated into the permit. This will allow time to gather sampling and flow data from routine monitoring in order to better evaluate the effectiveness of the BMPs listed in Part C II.

Part C Special Conditions
The following Part C Special Conditions are recommended, including Part C Special Conditions from the PAG-03 General Permit (effective 9/24/2016), Sector-specific BMPs from Appendix K of the PAG-03 NPDES General Permit (effective 9/24/2016), and Site Specific BMPs taken from both Attachment A Project Information and Attachment G PPC Plan, which were received on 12/22/2016 as part of the NPDES Application for Individual Permit to discharge Industrial Wastewater:

I. STORMWATER OUTFALLS AND AUTHORIZED NON-STORMWATER DISCHARGES

A. The permittee is authorized to discharge non-polluting stormwater from its site, alone or in combination with other wastewaters, through the following outfalls:

Outfall No.	Area Drained (ft^2)	Latitude	Longitude	Description
001	152,700	40° 21’ 39.06”	-75° 55’ 25.16”	Rock salt unloading, loading, and storage

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

A. 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);
- 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 where no detergents or hazardous cleaning products are used, and 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;
- 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);
- 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.

II. BEST MANAGEMENT PRACTICES (BMPs)

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

A. 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 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.

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.

B. 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.

C. 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.

D. 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.

E. Sector-Specific BMPs (taken from PAG-03 General Permit Appendix K: Existing Salt Storage and Distribution Sites)

1. Surface and Cover.

   a. The permittee shall store salt stockpiles and conduct loading/unloading activities on a synthetic, impermeable surface (i.e., $< 10^{-7}$ cm/sec).

   b. If stockpiles are not covered under permanent, structural cover, stockpiles must be covered by materials including but not limited to tarpaulin, polyethylene, polyurethane, polypropylene or hypalon with sufficient strength to prevent tearing. When loading and unloading is not being done, the entire stockpile must be covered at all times.

2. Material Management.

   a. Remove covering at the working face just high enough to load out the day's shipment. This will minimize moisture absorption and secure the cover if wind direction shifts toward the working face.

   b. Maintain the working face perpendicular to the long axis of the pile by loading alternately left/right and right/left.

   c. Avoid creating a horseshoe-shaped working face that results from removing the center of the pile and leaving extended edges or aprons.

   d. Maintain adequate cover at the lower edge or toe of the working face to permit maximum possible resealing of the edge of the cover when operations are completed for the day. Take care to avoid cover damage caused by cascading salt from the upper section of the working face.

   e. Establish and maintain the working face at the downwind end of the stockpile whenever operationally feasible.

   f. Clean up material spills from loading/unloading areas at the end of the work day.

3. Stormwater Management

   a. If stormwater collection ponds or basins are installed and utilized, such ponds shall contain a synthetic liner and be managed to limit discharges to only those times where surface water flows are elevated.

F. Site-Specific BMPs (taken from both the project information section of the application and the facility's PPC plan)

1. Baseline BMPs (taken from the project information section of the application)

   a. Good Housekeeping

      Good housekeeping procedures are designed to maintain a clean and orderly environment. Often common sense housekeeping procedures are the most effective tool in preventing stormwater impacts. A clean and orderly work area will reduce the potential for impacts from the facility operations to stormwater.

      The following is a list of ARSC practices:

      (1) All places of employment, passageways, storerooms, and service rooms are kept clean, orderly and in sanitary condition.

      (2) The site manager is responsible for proper housekeeping practices, and the site is subject to unannounced inspections from a member or ARSC management.

      (3) Means of egress are kept clear of tools, materials, and debris.

(4) Equipment is visually checked and maintained on a daily basis.

(5) Wherever possible, materials are stored inside to prevent exposure to weather conditions so as to avoid impacts to the extent possible.

(6) Trash and rubbish are removed to dumpster on an as-needed basis.

(7) Drip pans, absorbent pads, and/or other means are used under hose connections and in other situations where minor drips or spills are likely. This is done to maintain safe working conditions and to prevent the release of oil to the environment.

Incidental drips and spills of regulated substances will be cleaned up immediately using materials and supplies that are maintained on site.

b. Preventative Maintenance

The preventative maintenance program identifies areas and equipment that needs to be maintained to prevent as much as possible the possibility of stormwater impacts. Maintenance activities applicable to this facility include the following:

(1) Replace or repair waste collection bins if damaged or leaking.

(2) If indications of leaks, spills, or drips are evident anywhere in the facility, identify and correct the problem.

c. Visual Inspections

Routine facility inspections shall be conducted by facility personnel. If conditions are discovered which could impact stormwater quality, the Emergency Coordinator shall arrange for corrective action or designate an individual to make such arrangements. Records of corrective actions will be maintained by maintenance personnel.

d. Spill Prevention and Response

All employees should receive initial and refresher training in spill response and related environmental issues. All employees are responsible for the cleanup of any spill. Small, routine drips and spills may be cleaned by applying loose absorbent to the spill and then disposing of the absorbent properly.

If a discharge of a regulated substance occurs, the spill must be reported immediately to the Emergency Coordinator, who will implement appropriate measures to prevent adverse environmental impacts.

e. Runoff Management Practices

Runoff management practices prevent runoff from becoming impacted or treat stormwater runoff prior to off-site discharge. Runoff management practices in use at this facility include:

(1) Grading and paving in operating areas to divert stormwater away from areas that could potentially impact stormwater and prevent mixing with runoff.

(2) Parking areas are gravel, which allows stormwater to absorb into the ground and also minimizes erosion.

f. Employee Training

Environmental Awareness Training is provided to all ARSC employees on an annual basis. The training includes many environmental topics with focus on identification of the environmental impact that can be caused by improper management (i.e., storage, handling, and/or usage) of regulated

substances. This training is intended to familiarize employees with requirements related to RCRA, DOT, SPCC, and PPC regulations.

g. Additional BMPs

The applicable BMPs and stormwater controls from the "Salt Institute Voluntary Salt Storage Guidelines for Distribution Stockpiles" have been incorporated into the facility's PPC Plan.

2. Stormwater Monitoring and Reporting (taken from the project information section of the application)

Stormwater monitoring and reporting will be conducted as required by NPDES Permit No. PA0266477 Part A.I. and Part C.V.

3. Implementation (taken from the project information section of the application)

The site is expected to maintain compliance with the BMPs discussed earlier by conducting periodic inspections and implementing actions to improve BMPs and preventative maintenance practices. A summary of the schedule for BMPs, such as inspections and training, is provided in Summary of BMP Scheduled table below.

Summary of BMP Schedule

Task / Activity	**Frequency**
BMP Implementation	Ongoing
Inspections	Quarterly
Good Housekeeping	Daily
Preventive Maintenance	Quarterly
Spill Prevention and Response	Quarterly
Sedimentation and Erosion Control	Quarterly
Runoff Management Practices	Quarterly
Employee Training	Annually
New Employees	When Hired
All Employees	Initial and Annual Refresher

Modifications to the current BMPs will be evaluated on a quarterly basis. Based on the findings and recommendations identified from the quarterly inspections, a schedule will be developed to implement maintenance activities. BMPs and maintenance activities proposed based on quarterly inspections are anticipated to be scheduled for implementation during the next quarter, weather permitting.

4. Stormwater Management (taken from PPC Plan)

The goal of the Stormwater Management Program is to minimize the contact between the salt and rainwater, and contain and control all water from the stockpile area with the confines of the pad.

To minimize contact with precipitation, the stockpile is covered in sections by a waterproof tarp as salt is added to the pile. The seams are watertight and ballast bags are attached to the tarp from the top of the pile to the toe of the pile for resistance to high winds. The covering is properly maintained to prevent precipitation from contacting the salt.

At a minimum, the cover should be checked on a daily basis to ensure that it is in good condition, that there are no tears, that the seams are watertight, and that the pile is properly covered to prevent exposure of salt to precipitation. *

The perimeter of the stockpile cover is sealed to the pad with ballast where needed to prevent washout of salt from the toe of the stockpile. The perimeter cover ballast is maintained until the stockpile is exhausted.

At a minimum, the perimeter of the stock pile should be checked on a daily basis to ensure the perimeter of the stockpile cover is sealed to the pad with ballast and that the perimeter is contained within the asphalt berm. *

Dust emissions are curtailed at all points in the unloading system by controlling flow and drop and having the rock salt fall a minimum distance by adjusting the height of the radial stacker during unloading.

Trucks leaving the unloading area must be tarped by the drivers before departure.

5. Best Management Practices (taken from PPC Plan)

   a. Salt Handling

      The facility was designed to minimize and control the generation of dust. The facility operates in a manner that is sensitive to other industrial, commercial, public, and government facilities and residential areas.

      (1) The permittee will avoid handling salt during winds.

      (2) The permittee will minimize the distance the salt must fall from stackers and front end loaders.

      (3) Roadways will be kept clean.

      (4) Salt will be contained with the confining berms of the site.

      (5) The stockpile will be covered to prevent precipitation contact except when receiving salt or loading out to customers. *

      (6) Salt spilled by trucks, railcars or other vehicles will be cleaned up promptly.

      (7) Salt will be loaded into trucks within the pad area and loads will not exceed the legal or physical capacity of the truck.

      (8) All trucks must be tarped before leaving the site.

      (9) Salt deliveries to the site and shipments to customers will be scheduled when an employee is onsite to oversee the activities. *

      (10) During loadout, the permittee will remove the covering just high enough to load out the day's shipment. This will minimize the moisture absorption by the salt and provide security to the cover if the wind direction shifts toward the working face.

      (11) The working face will be maintained perpendicular to the long axis of the pile by loading alternately left/right and right/left.

      (12) The permittee will avoid creating a horseshoe shaped working face that results from removing the center of the pile and leaving extended edges or aprons.

      (13) Chunks of salt that form as the crust of the pile breaks up will be crushed and blended into the pile and not allowed to accumulate.

   b. General Maintenance.

      General maintenance is very important to the environmental health of the facility.

      (1) On site equipment, as well as trucks picking up salt loads, will be checked regularly for oil leaks. Oil spills will be cleaned up and reported to DEP per regulations.

      (2) The asphalt pad will be inspected from settlement and cracks. Repairs will be made before stockpiling more salt on the area. We will reseal the pad periodically to ensure non-degradation of the low permeability of the pad and base. Expansion joints will be resealed when necessary.

      (3) Visual inspections will be made of the storm water ditches and repaired promptly.

(4) Housekeeping is very important throughout the site.

*Indicates that the BMP has been modified from how it appears in the permittee's PPC Plan.

III. ROUTINE INSPECTIONS

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.

IV. 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.

V. 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.

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.

VI. POTENTIAL POLLUTION REPORTING

In addition to the Potential Pollution Reporting required by Part A.III.C.3. of this permit, the permittee shall immediately notify the Department whenever a salt storage stockpile cover is not properly maintained to prevent precipitation from contacting the salt and the permittee observes that stormwater runoff from the pile is causing or threatening pollution to a waterway of the Commonwealth, the permittee shall immediately notify the Department.

Oral notification to the Department is required as soon as possible, but no later than 4 hours after the permittee becomes aware of the discharge causing or threatening pollution.

VII. 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.

C. Osmotic pressure is not a function of weight concentration alone (mg/l); but rather a function of particle concentration (moles/l). Osmolality is specified in terms of milliosmoles/kilogram (mOs/kg).

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" (362-0400-001), SOPs and/or BPJ.

Outfall 001, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	1/month	Estimate
pH (S.U.)	XXX	XXX	Report Inst Min	XXX	XXX	Report	1/month	Grab
COD	XXX	XXX	XXX	Report	Report	XXX	1/month	Grab
TSS	XXX	XXX	XXX	Report	Report	XXX	1/month	Grab
Total Dissolved Solids	XXX	XXX	XXX	Report	Report	XXX	1/month	Grab
Osmotic Pressure (mOs/kg)	XXX	XXX	XXX	Report	Report	XXX	1/month	Grab
Oil and Grease	XXX	XXX	XXX	Report	Report	XXX	1/month	Grab
Available Cyanide	XXX	XXX	XXX	Report	Report	XXX	1/month	Grab
Chloride	XXX	XXX	XXX	Report	Report	XXX	1/month	Grab

Compliance Sampling Location: Outfall 001 (as proposed on January 28, 2019 amendment)

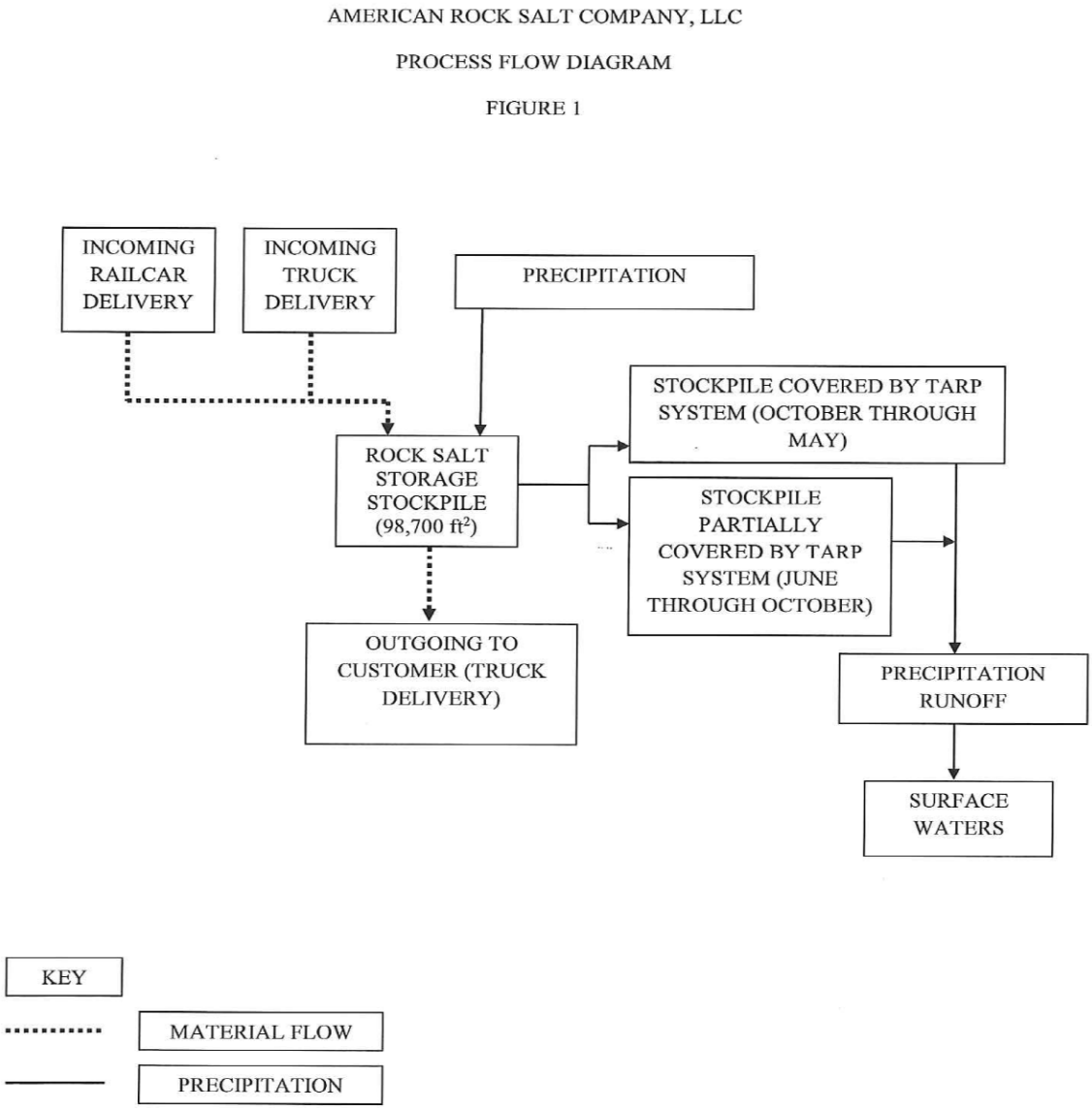


Figure 1. Process flow diagram *(from Application received 12/22/2016*)

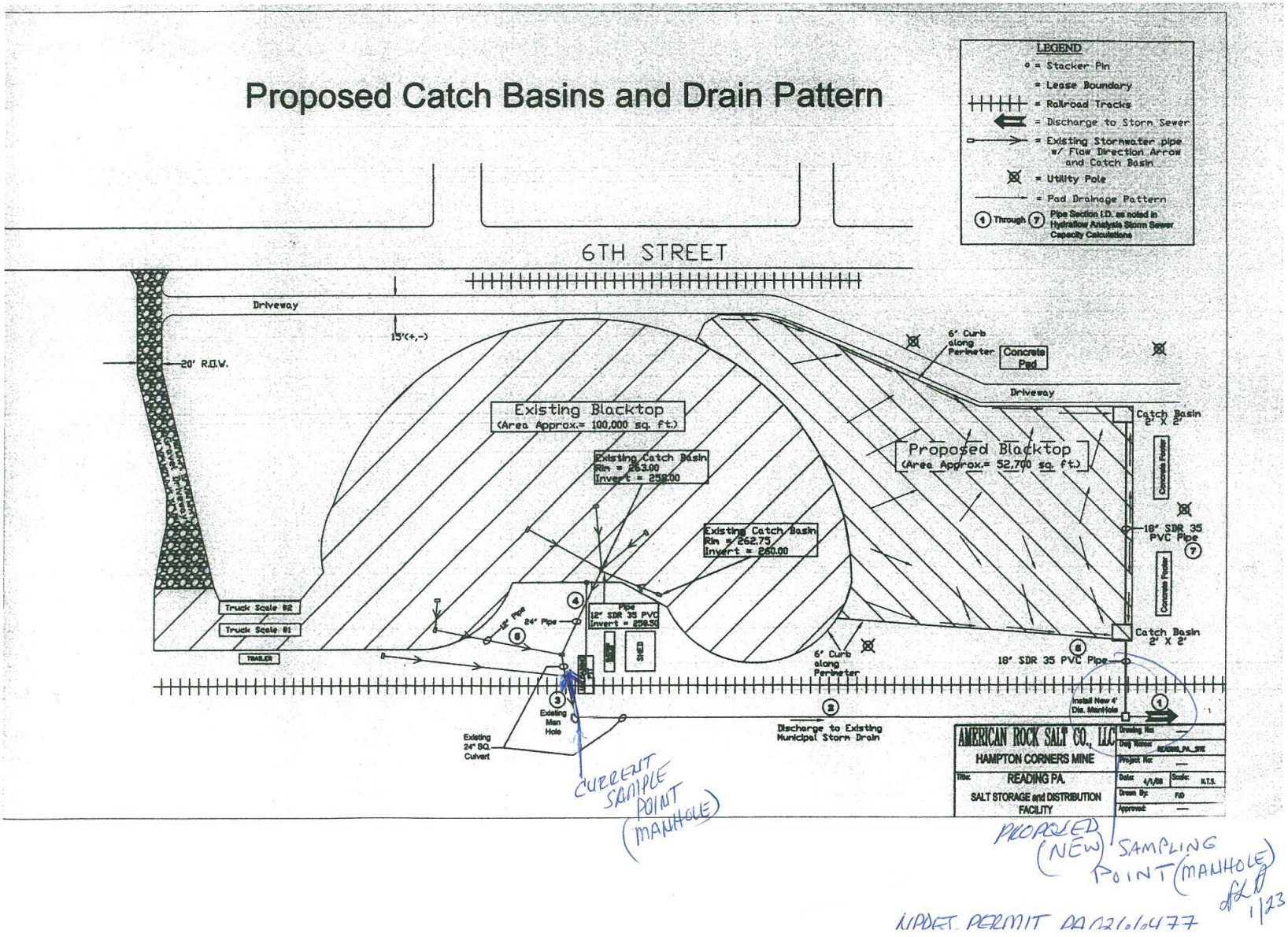


Figure 2. Site Plan showing locations of old Outfall 001 and new Outfall 001 *(from Amendment received January 28, 2019)*

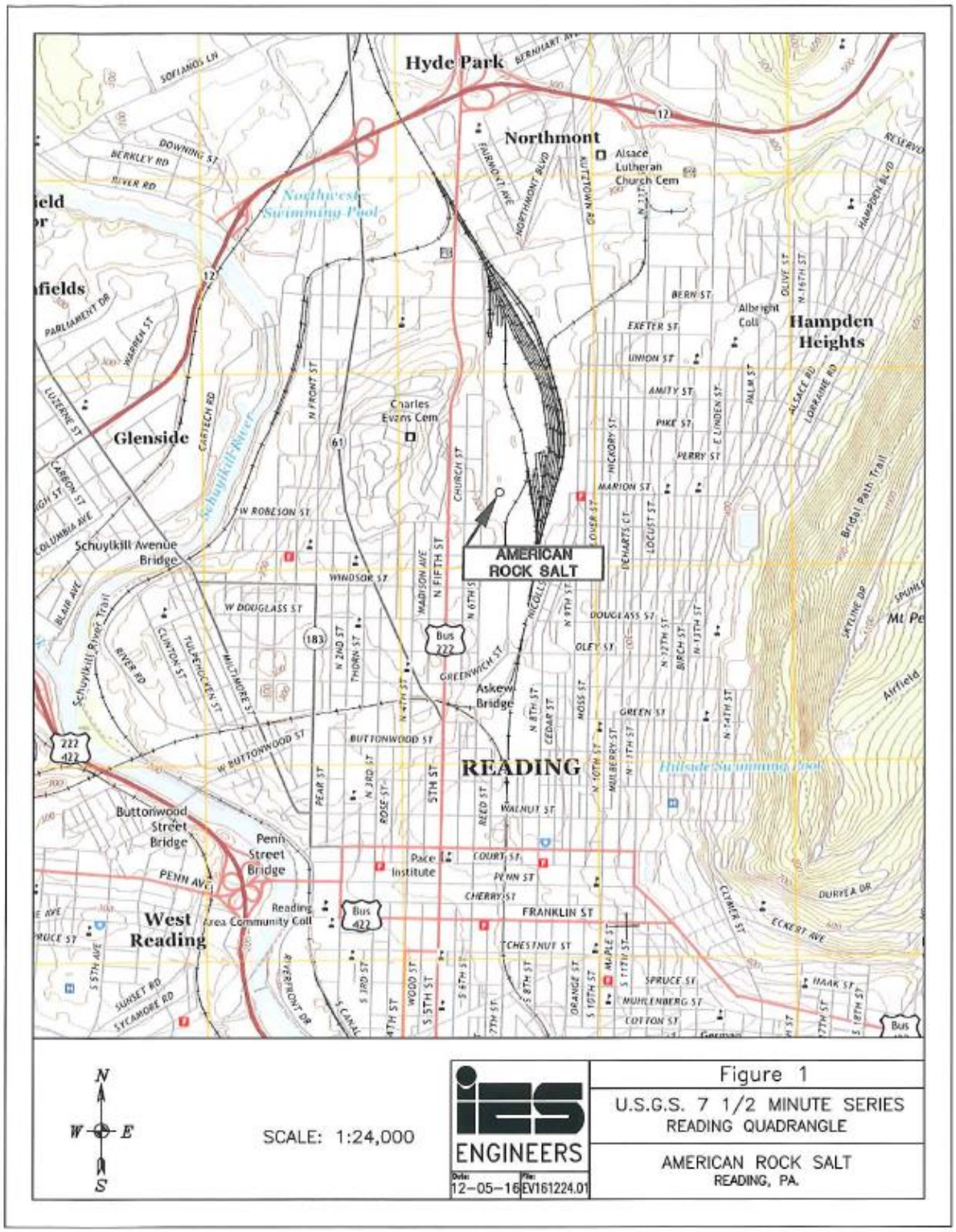
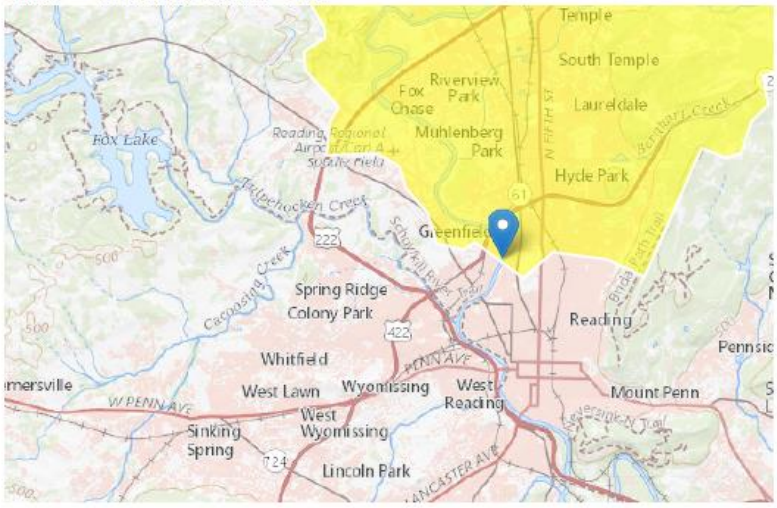


Figure 3. Topographic map showing location of facility *(from Application received 12/22/2016*)

StreamStats Report. American Rock Salt Company LLC - Reading Salt Storage Facility. PA0266477

Region ID: PA
Workspace ID: PA20190801150319171000
Clicked Point (Latitude, Longitude): 40.35891, -75.93798
Time: 2019-08-01 11:03:37 -0400



Low-Flow Statistics Parameters[100 Percent (661 square miles) Low Flow Region 2]

Parameter Code	Parameter Name	Value	Units	Min Limit	Max Limit
DRNAREA	Drainage Area	665	square miles	4.93	1280
PRECIP	Mean Annual Precipitation	48	inches	35	50.4
STRDEN	Stream Density	1.3	miles per square mile	0.51	3.1
ROCKDEP	Depth to Rock	4.3	feet	3.32	5.65
CARBON	Percent Carbonate	11	percent	0	99

Low-Flow Statistics Flow Report[100 Percent (661 square miles) Low Flow Region 2]

PII: Prediction Interval-Lower, PIu: Prediction Interval-Upper, SEp: Standard Error of Prediction, SE: Standard Error (other -- see report)

Statistic	Value	Unit	SE	SEp
7 Day 2 Year Low Flow	269	ft^3/s	38	38
30 Day 2 Year Low Flow	324	ft^3/s	33	33
7 Day 10 Year Low Flow	162	ft^3/s	51	51
30 Day 10 Year Low Flow	197	ft^3/s	46	46
90 Day 10 Year Low Flow	252	ft^3/s	36	36

Low-Flow Statistics Citations

Stuckey, M.H.,2006, Low-flow, base-flow, and mean-flow regression equations for Pennsylvania streams: U.S. Geological Survey Scientific Investigations Report 2006-5130, 84 p. (http://pubs.usgs.gov/sir/2006/5130/)

Figure 4. StreamStats Report. Printed 8/1/2019

Attachment A

Corrective Action section from Consent Order and Agreement (CAO) signed on December 29, 2017.

of the Clean Streams Law, 35 P.S. § 691.601; and subject ARSCO to a claim of civil penalties under Section 605 of the Clean Streams Law, 35 P.S. § 691.605.

ORDER

After full and complete negotiation of all matters set forth in this COA and upon mutual exchange of covenants contained herein, the parties desiring to avoid litigation and intending to be legally bound, it is hereby ORDERED by the Department and AGREED to by ARSCO as follows:

1. **Authority.** This COA is an Order of the Department authorized and issued pursuant to Sections 5 and 610 of the Clean Streams Law, 35 P.S. §§ 691.5 and 691.10; and Section 1917-A of the Administrative Code, 71 P.S. § 510.17.

2. **Findings.**

a. ARSCO agrees that the findings in paragraphs A through BB are true and correct and, in any matter or proceeding involving ARSCO and the Department, ARSCO shall not challenge the accuracy or validity of these findings.

b. The parties do not authorize any other persons to use the findings in the COA in any matter or proceeding.

3. **Corrective Action.**

a. Effective immediately upon signing this COA, ARSCO shall implement BMP's and Stormwater Controls in accordance with the "The Salt Storage Handbook", included in Exhibit 1.

b. Effective immediately upon signing this COA, ARSCO shall have fifteen (15) calendar days to cover the Reading and York salt stockpiles in accordance with Part A.IV.A of Appendix K in the ARS Reading and York Stockpile facility NPDES Permits. At a minimum, these large piles must be covered at all times with canvas, polyethylene films or other synthetic material except when receiving salt, building the stockpile or loading out to customers and then only the working face may be exposed. These piles must be contained on an impermeable base. ARSCO shall submit written verification to the Department of the date the action was completed.

c. Within thirty (30) calendar days of the date of execution of this COA, ARSCO shall develop and implement a monthly stormwater discharge sampling plan for the ARSCO Reading and York Salt Stockpile facilities. ARSCO shall submit monthly summaries of its stormwater sampling results and the efficacy of the existing BMPs at the Reading and York Salt Stockpile facilities until an NPDES Permit is approved by the Department. The monthly stormwater sampling summaries shall submitted be submitted no later than the 28th day of the following month.

d. Within thirty (30) calendar days of the date of execution of this COA, ARSCO shall submit, for Department review and approval, updated Corrective Action Plans ("CAPs") for the ARSCO Reading and York Stockpile facilities. Each updated CAP shall include, but not be limited to, the following items:

i. A revised Prevention, Preparedness and Contingency ("PPC") Plan & Environmental Emergency Response Plan for each facility to meet the requirements set forth in the 25 Pa. Code § 91.34 and the Department document 3850-PM-BCW0083d September 24, 2016, and the Department's Guidelines for the Development and Implementation of Environmental Emergency Response Plans, Document ID 400-2200-001 August 6, 2005. The PPC Plan shall identify potential sources of pollution that may reasonably be expected to affect the quality of stormwater discharges from the facility. In addition, the PPC Plan shall describe the BMPs that are to be used to reduce the pollutants in stormwater discharges at the facility ensuring compliance.

ii. Any applicable recommendations and BMPs from the "Salt Institute Voluntary Salt Storage Guidelines for Distribution Stockpiles" document Salt Storage Handbook – 2013 Revision or any subsequent revisions must be incorporated in the PPC Plans. A copy of this document can be obtained by contacting the Salt Institute at www.saltinstitute.org.

e. Within sixty (60) calendar days of the date of execution of this COA, ARSCO shall submit a report summarizing a professional engineer's evaluation of the condition and operability of the ARS York Stockpile stormwater retention basin. The report shall include a timeline for the repair and/or replacement of the basin's impermeable liner system and remediation or removal of contaminated soils.

f. Within fifteen (15) days of completing corrective actions 3.a, and 3.b, above, ARSCO shall submit written verification to the Department of the date the action was completed.

g. If the Department requires additional information to review or approve any submittal necessary to comply with this COA, ARSCO shall submit the requested information within ten (10) calendar days of the date of the Department's notice that such information is required; however, upon written request, including a justification from ARSCO, the Department may allow an extension for such a submittal.

4. **Civil Penalty Settlement.** Upon execution of this COA by ARSCO, ARSCO shall pay a civil penalty of $25,000.00. This payment is in settlement of the Department's claim for civil penalties

Attachment B

Outfall 001 Stomrwater Sampling Plan for Reading Facility

American Rock Salt Company LLC
ARSCO Reading Stockpile

Outfall 001 Stormwater Sampling Plan

January 31, 2018

This stormwater sampling plan is for the stormwater discharged at the Reading Stockpile site, OF 001. This site is covered under the PAG-03 NPDES Permit No. PAR323513 and Appendix K of the Department's General Permit for the discharge of stormwater associated with industrial activities.

Per the executed Consent Order and Agreement of December 29th, 2017, sampling of OF 001 is to occur monthly. Monthly stormwater analytical results are to be submitted to PaDEP no later than the 28th day of the following month on Discharge Monitoring Reports (DMRs).

The parameters to be monitored are:

- pH (SU)
- Total Suspended Solids (TSS) (mg/L)
- Total Dissolved Solids (TDS) (mg/L)
- Chloride (mg/L)

Per Appendix K of the General Permit (revised September 2016), the samples should be collected from discharges resulting from a store event that is greater than 0.1inch in magnitude and that occurs at least 72 hours from the previously measurable (greater than 0.1 inch rainfall) storm event).

Per Section V of the Permit, grab samples should be collected within the first 30 minutes of a discharge. If not possible, the samples must be collected as soon as possible after the first 30 minutes of discharge.

Sampling, properly preserved sample bottles, and analytical reports are provided by M.J. Reider Associates, Inc., (610) 374-5129. Samples should be iced immediately and transported at temperatures < 4°C. Samples' collection and delivery, by either the Site Manager or Laboratory Staff, should follow accepted QA/QC protocols and practices

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Continued…

The Standard Methods for pH analysis requires the analysis be performed within 15 minutes of collection. If ALS Laboratory cannot analyze a sample in the laboratory within that time, pH sampling and analyzing can be completed by using a field pH meter and kit (by the laboratory or Site Operator). The meter should be calibrated daily or before use. Calibration and meter/probe maintenance should be logged for review.

The OF 001sampling point is from the drain located at the Northeast corner near the Pad. The Site Manager shall be in contact with M.J. Reider Associates to ensure sample collection is completed. Sampling should occur each month with the first qualifying storm event.

The Chain of Custody form is completed by M.J. Reider Associates, Inc. and submitted with the analytical report.

Reporting the analytical results will be submitted to DEP using the Discharge Monitoring Report (DMR) system.

Prepared by:
Sharon Hinkson
Environmental and QA Engineer
American Rock Salt Company

Revision/Review History:
January 12, 2018: Plan created
January 31, 2018: Updates per DEP Erick Ammon January 29, 2018 emailed Review Notes

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