pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southcentral Regional Office
CLEAN WATER PROGRAM

Application Type	**New**	Application No.	**PA0267155**
Facility Type	**Industrial**	APS ID	**1017793**
Major / Minor	**Minor**	Authorization ID	**1316948**

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

Applicant and Facility Information

Applicant Name	**Fulton Financial Corporation**	Facility Name	**Fulton Bank Admin Service**
Applicant Address	533 Fellowship Road, Suite 100	Facility Address	1695 State Street
	Mt. Laurel, NJ 08054		East Petersburg, PA 17520-1319
Applicant Contact	Mark Matticola	Facility Contact	James Breidenstine
Applicant Phone	(856) 787-6260	Facility Phone	(717) 201-3032
Client ID	289373	Site ID	577254
SIC Code	6021	Municipality	East Petersburg Borough
SIC Description	Fin, Ins & Real Est - National Commercial Banks	County	Lancaster
Date Application Received	June 2, 2020	EPA Waived?	Yes
Date Application Accepted	July 15, 2020	If No, Reason	

Purpose of Application: New Individual NPDES Permit to discharge industrial wastewater

Summary of Review

Fulton Financial Corporation has applied to the Pennsylvania Department of Environmental Protection (DEP) for issuance of a National Pollutant Discharge Elimination System (NPDES) permit. The application requests permit approval for the discharge of treated groundwater from a groundwater treatment system (GWTS), which treats volatile organic compound (VOC) impacted groundwater collected from a basement sump. The facility is located in East Petersburg Borough, Lancaster County.

Per the application, the site is a former photochemical etching and fuse assembly business, currently being used as administrative offices for Fulton Financial. Historically, Hamilton Watch Company operated the site from the early 1950s to 1977. The facility was then used as a photochemical etching business by Lancaster Metal Science Corporation from 1977 to 1984.The former site operations led to VOC contamination in the groundwater. The sources of VOCs have been excavated and removed from the site. Treatment of the groundwater began in the 1990s. The groundwater is pumped from a sump to eliminate groundwater in the basement. There is a boiler in the basement, and the evaporative condensate from the boiler passes through a limestone filter and then reaches the sump. The sump also receives fresh water from the fire pump startup and bypass, and the overflow from the domestic water backfill preventer. 99% of the water pumped from the sump is groundwater, with the remainder consisting of the boiler evaporative condensate and the freshwater overflow. All of the water pumped by the sump is treated using granular activated carbon. The granular activated carbon units discharge the treated effluent to the facility's stormwater drainage system, which discharges to an unnamed tributary of the Little Conestoga Creek.

Approve	Deny	Signatures	Date
X		*Benjamin Lockwood* Benjamin R. Lockwood / Environmental Engineering Specialist	January 28, 2021
		Daniel W. Martin, P.E. / Environmental Engineer Manager	
		Maria D. Bebenek, P.E. / Program Manager	

Summary of Review

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.

Supplemental information is included at the end of the fact sheet.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	001	Design Flow (MGD)	.0216
Latitude	40º 5' 54.96"	Longitude	76º 21' 42.12"
Wastewater Description:	Groundwater Cleanup Discharge		
Receiving Waters	Unnamed Tributary to Little Conestoga Creek (TSF, MF)	Stream Code	07581
NHD Com ID	57463275	RMI	1.5
Drainage Area	1.27 mi^2	Yield (cfs/mi^2)	0.0215
Q_{7-10} Flow (cfs)	0.0273	Q_{7-10} Basis	USGS PA StreamStats
Elevation (ft)	343	Slope (ft/ft)	
Watershed No.	7-J	Chapter 93 Class.	TSF, MF
Existing Use	N/A	Existing Use Qualifier	N/A
Exceptions to Use	N/A	Exceptions to Criteria	N/A
Assessment Status	Impaired		
Cause(s) of Impairment	Pathogens, Nutrients, Siltation, Siltation, Cause Unknown		
Source(s) of Impairment	Source Unknown, Crop Production (Crop Land or Dry Land), Crop Production (Crop Land or Dry Land), Grazing in Riparian or Shoreline Zones, Urban Runoff/Storm Sewers		
TMDL Status	N/A	Name	N/A
Nearest Downstream Public Water Supply Intake	Holtwood Power Plant		
PWS Waters	Susquehanna River	Flow at Intake (cfs)	
PWS RMI		Distance from Outfall (mi)	28.4

Other Comments: Outfall 001 discharges to a dry swale on the site which is approximately 1,000 feet from the unnamed tributary to Little Conestoga Creek. Basin delineation and receiving water information in the table above is based on the location where the dry stream enters Unnamed Tributary to Little Conestoga Creek at RMI 1.5. At this location, USGS StreamStats provided a drainage area of 1.27 mi^2 and a Q_{7-10} flow 0.0273 cfs.

Treatment Facility Summary

Treatment Facility Name: Fulton Financial Corporation

The maximum production flow for this facility is 0.0216 MGD.
The average/design flow during production is 0.0144 MGD.

The major components of the treatment unit are:

1. Two pumps installed in the sump
2. Two in-line granular activated carbon units (GAC-1 and GAC-2) connected in series
3. Sample ports for influent, mid-effluent, and effluent water
4. Flow Meter

The 2 pumps discharge the groundwater at a rate of 5-10 gpm. The primary pump runs continually with the exception of low water table conditions. In this case, the secondary pump only runs when the water table is high. Each granular activated carbon unit is a closed steel 55-gallon drum. Carbon will be replaced approximately every 3 months. The effluent sample port is identified in this permit as IMP-101.

Development of Effluent Limitations

Outfall No.	001	**Design Flow (MGD)**	.0216
Latitude	40º 5' 54.96"	**Longitude**	76º 21' 42.12"

Wastewater Description: Groundwater Cleanup Discharge

Chemical Additives. None reported

Development of Effluent Limitations

The treated groundwater is discharged through Outfall 001 to the site's stormwater drainage system, which is approximately 1,000 feet from the UNT to Little Conestoga Creek.

Per Module 2 of the application, Trichloroethylene, Lead, and cis-1,2-Dichloroethylene are the parameters of concern present in the effluent. Therefore, limits will be included in the permit for these parameters to evaluate the effectiveness of the treatment system. The limits are based on the guidance "Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers," Document Number 391-2000-014, due to the fact that Outfall 001 discharges to a dry stormwater system.

> *"If the hydrogeologist determines that the discharge may adversely impact groundwater use, applicable human health-related criteria should be imposed at the point of discharge. If an MCL has been promulgated for the pollutant of concern, the effluent limit should be set equal to the MCL value. If no MCL has been promulgated for the pollutant of concern, the effluent limit should be set equal to the human health-based criterion developed specifically for groundwater protection by the Bureau of Water Standards and Facility Regulation. These criteria will follow the guidelines for surface water criteria development, but with exposure conditions set to more accurately assess groundwater. Specifically, these include drinking water consumption of 2 L/d by a 70 kg person, and with an overall 10-6 lifetime risk management level (no fish consumption component will be applicable). If the hydrogeologist determines that groundwater uses will not be adversely impacted by a wastewater discharge, final treatment requirements and effluent limits will not be governed by the requirement to protect groundwater."*

According to this guidance in Section VI.B.2, a Maximum Contaminant Level (MCL) has been promulgated for trichloroethylene and cis-1,2-Dichloroethyene. The MCLs for these parameters are 0.005 mg/l and 0.07 mg/l, respectively. The action level for Total Lead is 0.015 mg/l. These MCLs will be included in the permit as annual average effluent limitations. Daily maximum and instantaneous maximum limits were calculated by the using the standard IW multipliers (i.e., 2.0 and 2.5).

It is recommended that pH limits be included to reflect PA Code 25 §95.2 stating wastes must have a pH of not less than 6 and not greater than 9.

PART C SPECIAL CONDITIONS

I. 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 treatment.

C. If the applicable standard or effluent guideline limitation relating to the application for Best Available Technology (BAT) Economically Achievable or to Best Conventional Technology (BCT) is developed by DEP or EPA for this type of industry, and if such standard or limitation is more stringent than the corresponding limitations of this permit (or if it controls pollutants not covered by this permit), DEP may modify or revoke and reissue the permit to conform with that standard or limitation.

D. The attention of the permittee is directed to the fact that effluent is discharged to a location with little or no assimilative capacity or dilution during critical periods. If the effluent creates a health hazard or nuisance, the permittee shall, upon notice from DEP, provide such additional treatment as may be required by DEP.

II. GROUNDWATER CLEANUP – Activated Carbon Filtration

A. If the applicable standard or effluent guideline limitation relating to the application for Best Available Technology Economically Achievable (BAT) or to Best Conventional Technology (BCT) is developed by the Department, or by EPA for this type of industry, and if such standard or limitation is more stringent than the corresponding conditions of this permit (or if it controls pollutants not covered by this permit), then the Department reserves the right to modify, or to revoke and reissue the permit to conform with that standard or limitation.

B. Sludges and other solids shall be handled and disposed of in compliance with 25 Pa. Code, Chapters 262, 263, and 264 (related to permits and requirements for landfilling and storage of hazardous sludge) and applicable federal regulations, the Federal Clean Water Act, RCRA and their amendments. 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 treatment.

C. The permittee shall operate the treatment facilities approved herein on a continual basis. If accidental breakdown or normal periodic maintenance should cause cessation of operation, the permittee shall take satisfactory measures to ensure the treatment works are placed back in operation at the earliest possible time. The permittee shall orally report to the Department within 24 hours of an unanticipated temporary shutdown of the treatment facility that is longer than 24 hours in duration or at least 24 hours prior to an anticipated maintenance shutdown.

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.

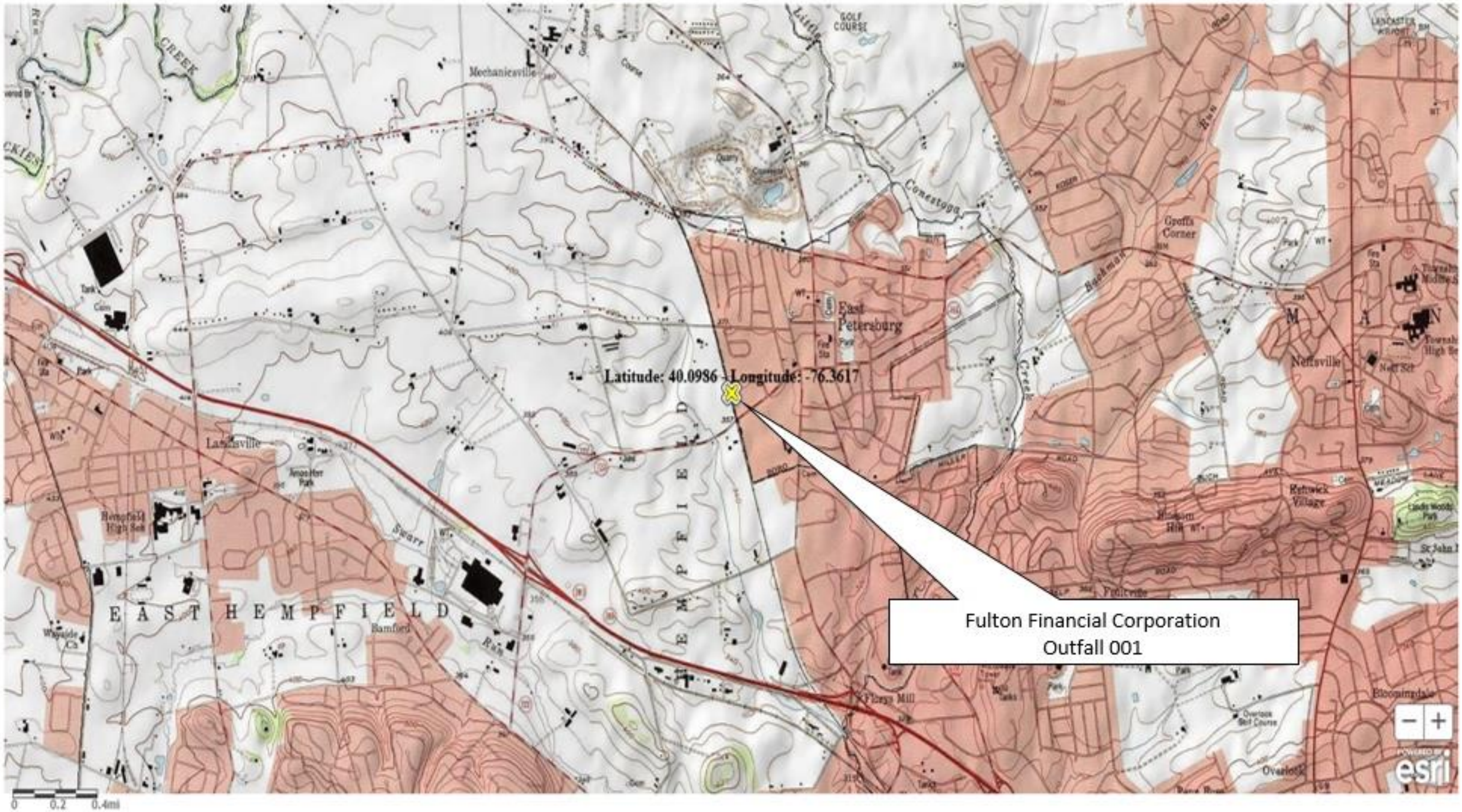
Outfall 001, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum 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	Measured
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/month	Grab
Total Lead	XXX	XXX	XXX	0.015	0.030	0.037	1/month	Grab
cis-1,2-Dichloroethylene	XXX	XXX	XXX	0.07	0.14	0.17	1/month	Grab
Trichloroethylene	XXX	XXX	XXX	0.005	0.010	0.012	1/month	Grab

Compliance Sampling Location: IMP-101

Other Comments: None

Tools and References Used to Develop Permit	
☐	WQM for Windows Model (see Attachment)
☐	PENTOXSD for Windows Model (see Attachment)
☐	TRC Model Spreadsheet (see Attachment)
☐	Temperature Model Spreadsheet (see Attachment)
☐	Toxics Screening Analysis Spreadsheet (see Attachment)
☐	Water Quality Toxics Management Strategy, 361-0100-003, 4/06.
☐	Technical Guidance for the Development and Specification of Effluent Limitations, 362-0400-001, 10/97.
☐	Policy for Permitting Surface Water Diversions, 362-2000-003, 3/98.
☐	Policy for Conducting Technical Reviews of Minor NPDES Renewal Applications, 362-2000-008, 11/96.
☐	Technology-Based Control Requirements for Water Treatment Plant Wastes, 362-2183-003, 10/97.
☐	Technical Guidance for Development of NPDES Permit Requirements Steam Electric Industry, 362-2183-004, 12/97.
☐	Pennsylvania CSO Policy, 385-2000-011, 9/08.
☐	Water Quality Antidegradation Implementation Guidance, 391-0300-002, 11/03.
☐	Implementation Guidance Evaluation & Process Thermal Discharge (316(a)) Federal Water Pollution Act, 391-2000-002, 4/97.
☐	Determining Water Quality-Based Effluent Limits, 391-2000-003, 12/97.
☐	Implementation Guidance Design Conditions, 391-2000-006, 9/97.
☐	Technical Reference Guide (TRG) WQM 7.0 for Windows, Wasteload Allocation Program for Dissolved Oxygen and Ammonia Nitrogen, Version 1.0, 391-2000-007, 6/2004.
☐	Interim Method for the Sampling and Analysis of Osmotic Pressure on Streams, Brines, and Industrial Discharges, 391-2000-008, 10/1997.
☐	Implementation Guidance for Section 95.6 Management of Point Source Phosphorus Discharges to Lakes, Ponds, and Impoundments, 391-2000-010, 3/99.
☐	Technical Reference Guide (TRG) PENTOXSD for Windows, PA Single Discharge Wasteload Allocation Program for Toxics, Version 2.0, 391-2000-011, 5/2004.
☐	Implementation Guidance for Section 93.7 Ammonia Criteria, 391-2000-013, 11/97.
☒	Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers, 391-2000-014, 4/2008.
☐	Implementation Guidance Total Residual Chlorine (TRC) Regulation, 391-2000-015, 11/1994.
☐	Implementation Guidance for Temperature Criteria, 391-2000-017, 4/09.
☐	Implementation Guidance for Section 95.9 Phosphorus Discharges to Free Flowing Streams, 391-2000-018, 10/97.
☐	Implementation Guidance for Application of Section 93.5(e) for Potable Water Supply Protection Total Dissolved Solids, Nitrite-Nitrate, Non-Priority Pollutant Phenolics and Fluorides, 391-2000-019, 10/97.
☐	Field Data Collection and Evaluation Protocol for Determining Stream and Point Source Discharge Design Hardness, 391-2000-021, 3/99.
☐	Implementation Guidance for the Determination and Use of Background/Ambient Water Quality in the Determination of Wasteload Allocations and NPDES Effluent Limitations for Toxic Substances, 391-2000-022, 3/1999.
☐	Design Stream Flows, 391-2000-023, 9/98.
☐	Field Data Collection and Evaluation Protocol for Deriving Daily and Hourly Discharge Coefficients of Variation (CV) and Other Discharge Characteristics, 391-2000-024, 10/98.
☐	Evaluations of Phosphorus Discharges to Lakes, Ponds and Impoundments, 391-3200-013, 6/97.
☐	Pennsylvania's Chesapeake Bay Tributary Strategy Implementation Plan for NPDES Permitting, 4/07.
☒	SOP: No. BPNPSM-PMT-001, No. BCW-PMT-032
☐	Other:



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Fulton Financial Corporation PA0267155 Outfall 001

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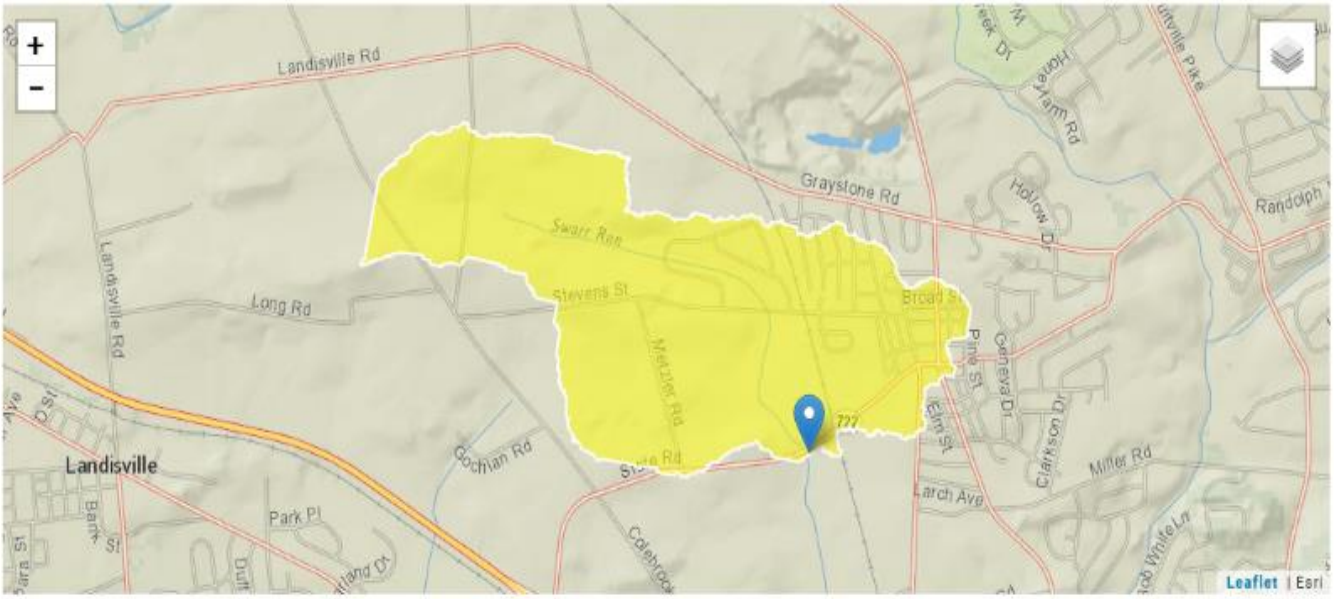

Basin Characteristics

Parameter Code	Parameter Description	Value	Unit
DRNAREA	Area that drains to a point on a stream	1.27	square miles
BSLOPD	Mean basin slope measured in degrees	1.3077	degrees
ROCKDEP	Depth to rock	5	feet
URBAN	Percentage of basin with urban development	19.5931	percent

Low-Flow Statistics Parameters[Low Flow Region 1]

Parameter Code	Parameter Name	Value	Units	Min Limit	Max Limit
DRNAREA	Drainage Area	1.27	square miles	4.78	1150
BSLOPD	Mean Basin Slope degrees	1.3077	degrees	1.7	6.4
ROCKDEP	Depth to Rock	5	feet	4.13	5.21
URBAN	Percent Urban	19.5931	percent	0	89

Low-Flow Statistics Disclaimers[Low Flow Region 1]

One or more of the parameters is outside the suggested range. Estimates were extrapolated with unknown errors

Low-Flow Statistics Flow Report[Low Flow Region 1]

Statistic	Value	Unit
7 Day 2 Year Low Flow	0.0887	ft^3/s
30 Day 2 Year Low Flow	0.15	ft^3/s
7 Day 10 Year Low Flow	0.0273	ft^3/s
30 Day 10 Year Low Flow	0.0486	ft^3/s
90 Day 10 Year Low Flow	0.136	ft^3/s

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.

Application Version: 4.4.0

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Fulton Financial Corporation PA0267155 Downstream Point

Enter comments:

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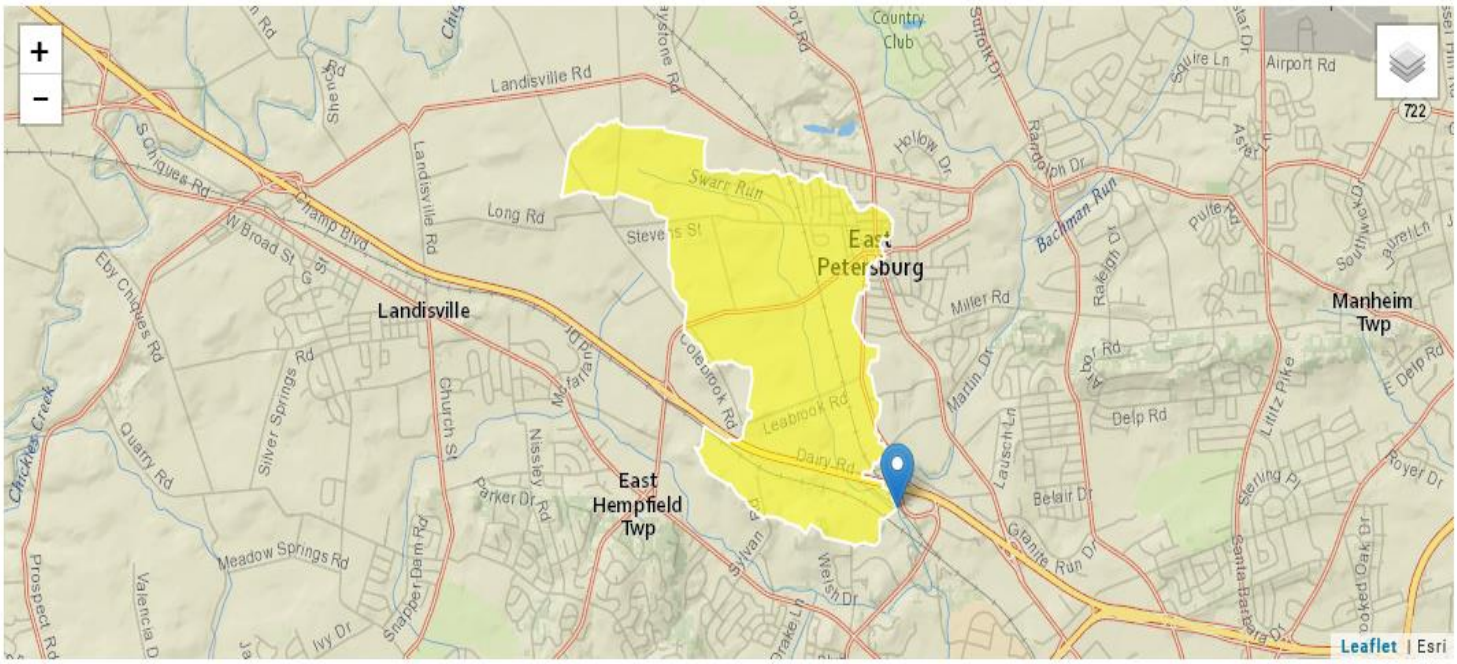

Basin Characteristics

Parameter Code	Parameter Description	Value	Unit
DRNAREA	Area that drains to a point on a stream	2.54	square miles
BSLOPD	Mean basin slope measured in degrees	1.4926	degrees
ROCKDEP	Depth to rock	5	feet
URBAN	Percentage of basin with urban development	16.013	percent

Low-Flow Statistics Parameters[Low Flow Region 1]

Parameter Code	Parameter Name	Value	Units	Min Limit	Max Limit
DRNAREA	Drainage Area	2.54	square miles	4.78	1150
BSLOPD	Mean Basin Slope degrees	1.4926	degrees	1.7	6.4
ROCKDEP	Depth to Rock	5	feet	4.13	5.21
URBAN	Percent Urban	16.013	percent	0	89

Low-Flow Statistics Disclaimers[Low Flow Region 1]

One or more of the parameters is outside the suggested range. Estimates were extrapolated with unknown errors

Low-Flow Statistics Flow Report[Low Flow Region 1]

Statistic	Value	Unit
7 Day 2 Year Low Flow	0.198	ft^3/s
30 Day 2 Year Low Flow	0.323	ft^3/s
7 Day 10 Year Low Flow	0.0651	ft^3/s
30 Day 10 Year Low Flow	0.111	ft^3/s
90 Day 10 Year Low Flow	0.289	ft^3/s

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.

Application Version: 4.4.0

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