

Application Type Renewal  
Facility Type Stormwater  
Major / Minor Minor

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

Application No. PA0275816  
APS ID 887480  
Authorization ID 1327062

**Applicant and Facility Information**

Applicant Name	<u>Bosch Rexroth Corporation</u>	Facility Name	<u>Bosch Rexroth Corporation</u>
Applicant Address	<u>2315 City Line Road</u> <u>Bethlehem, PA 18018-2131</u>	Facility Address	<u>2655 Brodhead Road</u> <u>Bethlehem, PA 18020-8957</u>
Applicant Contact	<u>George M. Stasko, HSE Manager</u>	Facility Contact	<u>George M. Stasko, HSE Manager</u>
Applicant Phone	<u>(610) 954-8718</u>	Facility Phone	<u>(610) 954-8718</u>
Client ID	<u>38242</u>	Site ID	<u>781727</u>
SIC Code	<u>3594,3593</u>	Municipality	<u>Bethlehem Township</u>
SIC Description	<u>Manufacturing - Fluid Power Pumps and Motors</u> <u>Manufacturing - Fluid Power Cylinders and Actuators</u>	County	<u>Northampton</u>
Date Application Received	<u>September 8, 2020</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>September 29, 2020</u>	If No, Reason	
Purpose of Application	<u>Renewal of NPDES permit for discharge of industrial stormwater.</u>		

**Summary of Review**

The applicant is requesting a renewal of their NPDES permit to discharge stormwater associated with industrial activity to Monocacy Creek, a HQ-CWF, MF (High Quality-Cold Water Fishes, Migratory Fishes) designated receiving stream in state water plan basin 2-C (Lower Lehigh River). As per the Department's current existing use list, the receiving stream segment does not have an existing use classification that is more protective than its designated use.

The facility is categorized by SIC codes 3594 (Manufacturing – Fluid Power Pumps and Motors) and 3593 (Manufacturing – Fluid Power Cylinders and Actuators). These SIC codes fall under Appendix J monitoring requirements of the PAG-03 General Permit. All industries classified under Appendix J should be within 100 mg/L for Total Suspended Solids (TSS) and 30 mg/L for Oil and Grease. These values are included as IMAX limitations and should be sampled semi-annually. Monitoring and reporting requirements for Total Kjeldahl Nitrogen and Total Iron have been removed from the permit as per updated requirements under Appendix J.

Bosch Rexroth Corporation (Bosch) manufactures industrial hydraulic components at its facility in Bethlehem City, Lehigh County, PA. This NPDES permit renewal is for Bosch's satellite facility on Brodhead Road in Bethlehem Township, Northampton County, PA. The Brodhead Road facility is a leased section of the 2655 Brodhead Road building. Bosch occupies approximately a third of the facility at the southern end of the building. Other tenants occupy the remainder of the building. At issuance of the previous 2016 NPDES permit, Bosch also leased the 2625 Brodhead Road building, however Bosch has since consolidated all operations to Building 2655 in 2019.

Stormwater runoff from the facility is primarily to the south through the storm sewers on Bosch's leased property. Stormwater flows through the storm sewers to a retention basin south of the building along Brodhead Road. Overflow from the retention basin at 2655 flows to the retention basin on the 2625 property and then discharges to the Bethlehem Township Municipal

Approve	Deny	Signatures	Date
X		/s/ Allison Seyfried / Environmental Engineering Specialist	May 20, 2021
X		/s/ Amy M. Bellanca, P.E. / Environmental Engineer Manager	5-25-21

### Summary of Review

Stormwater Sewer System. The current point of compliance for stormwater sampling is at the inlet on the southern side of the stormwater basin at 2625 Brodhead Road. Since Bosch no longer leases space at 2625, Bosch proposes to move the sampling location at 2655 Brodhead Road. Bosch's main justifications for this proposal are:

1. The current point of compliance is not considered representative of just Bosch's facility because it collects stormwater from areas associated with multiple tenants.
2. Bosch no longer has access to the gate for the fence around the stormwater basin at 2625 Brodhead Road.

Bosch proposes to collect samples just off the pavement (in the riprap or grassy area) along the southwest portion of the parking area on the western side of the 2655 building (see attached Figure). Bosch states that this location would collect sheet flow from their parking and loading/unloading areas. If a sample cannot be collected just off the pavement then the sample will be collected at the northwestern outlet of the stormwater basin south of the building. However, this location is less preferred because it collects stormwater from the entire system.

The new sampling location is acceptable to the Department.

Bosch also proposes the sampling frequency be decreased to 1/year instead of 1/ 6 months. Bosch's justification for this proposal is:

1. The facility would likely be eligible for "No Exposure Certification" if it wasn't in a HQ watershed. Bosch doesn't store any drums or other materials outside that could come into contact with stormwater.
2. BMPs are in place in the event there is a spill.
3. Stormwater flows through two stormwater basins prior to release into the MS4, which supports on-site infiltration.

The 1/6 months sampling frequency will remain in this permit. Although conditions of No Exposure may be met at the facility, it does not change that the facility's discharge is to a surface water classified as High Quality. Monocacy Creek is also impaired for habitat alterations and siltation. Please keep in mind that even General Permits must sample 1/6 months.

The cover letter also included two clarifications regarding the facility. First, the facility is located in Bethlehem Township, not the City of Bethlehem. This was verified and updated in the permit documents. Second, the primary SIC code is 3594 and the secondary SIC is 3593. This was updated in the permit documents/records as well.

PPC Plan implementation and completion of an annual inspection and compliance evaluation are required under the permit.

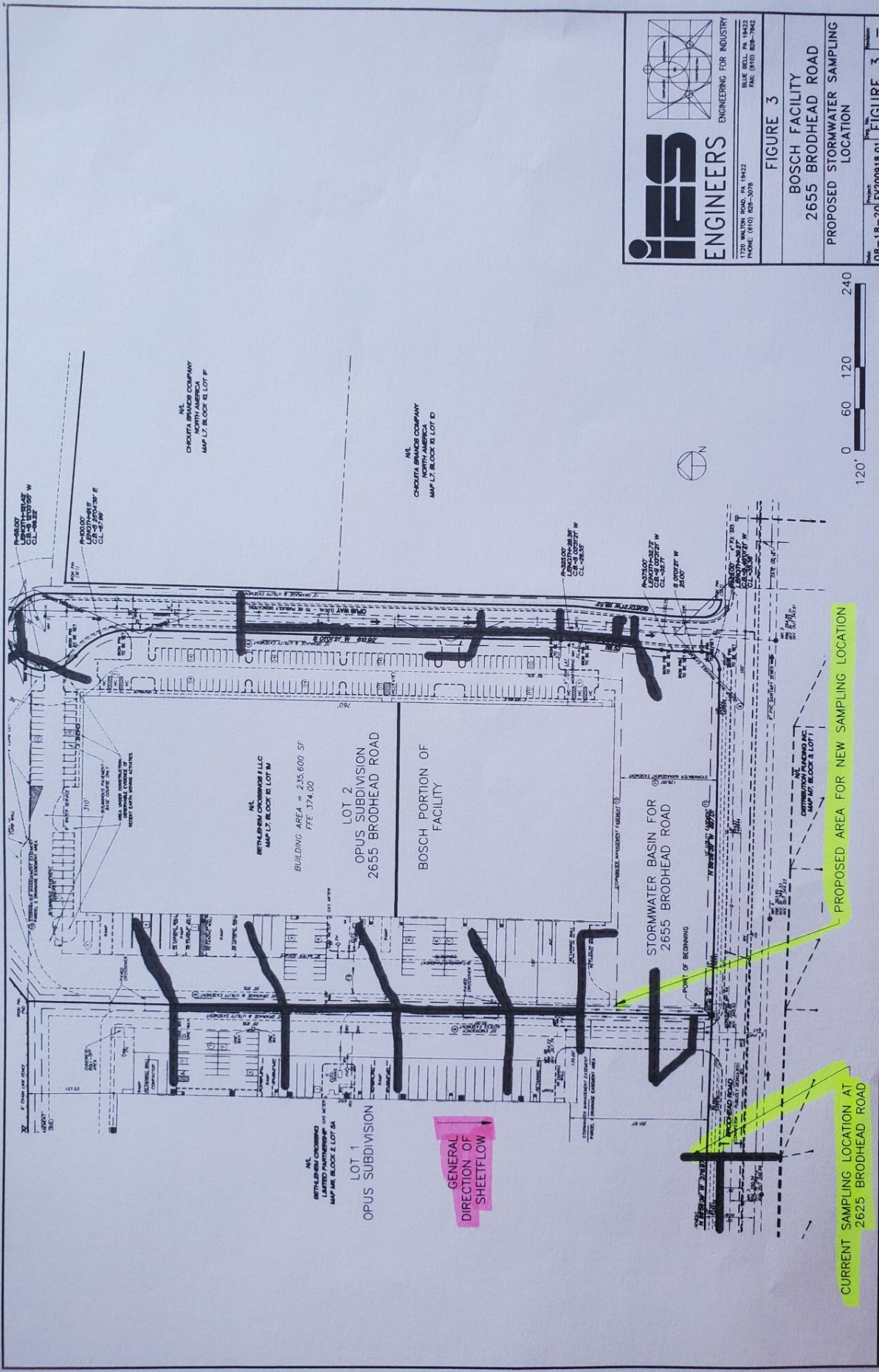
A Water Management System Inspection query indicated on February 28, 2019 a Compliance Evaluation was performed.

The previously issued permit expired on February 28, 2021. The renewal application was received on September 8, 2020.

There are no open violations for this client that would warrant withholding the issuance of this permit.

#### 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.



**IES ENGINEERS**  
 ENGINEERING FOR INDUSTRY  
 1720 WALTON ROAD, PA 19422  
 PHONE (610) 858-3078  
 BLUE BELL, PA 19422  
 FAX (610) 858-7842

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**FIGURE 3**

**BOSCH FACILITY  
 2655 BROADHEAD ROAD  
 PROPOSED STORMWATER SAMPLING  
 LOCATION**

Date: 08-18-20 | Project: EV200918.01 | Revision: **FIGURE 3** | Page: 3