

Application Type Renewal
Facility Type Industrial
Major / Minor Minor

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

Application No. PA0275841
APS ID 889431
Authorization ID 1374920

Applicant and Facility Information

Applicant Name	<u>Curtiss Wright EPD</u>	Facility Name	<u>Curtiss Wright EPD</u>
Applicant Address	<u>1185 Feather Way</u> <u>Bethlehem, PA 18015</u>	Facility Address	<u>1185 Feather Way</u> <u>Bethlehem, PA 18015</u>
Applicant Contact	<u>Todd Schurra, General Manager</u>	Facility Contact	<u>Pamela Carabetta,</u> <u>Quality Assurance Manager</u>
Applicant Phone	<u>(610) 997-6448</u>	Facility Phone	<u>610-997-6407</u>
Client ID	<u>325678</u>	Site ID	<u>787948</u>
SIC Code	<u>3561</u>	Municipality	<u>Bethlehem City</u>
SIC Description	<u>Manufacturing - Pumps and Pumping</u> <u>Equipment</u>	County	<u>Northampton</u>
Date Application Received	<u>September 29, 2021</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>April 26, 2022</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>NPDES permit renewal for an existing discharge of IW stormwater and non-process pump test water.</u>		

Summary of Review

The applicant is requesting a renewal of their NPDES permit to discharge intermittent non-process wastewater from pump testing and stormwater associated with industrial activity to Saucon 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 does not have an existing use classification that is more protective than its designated use. This stream segment is designated as a naturally reproducing trout stream as per PA Fish & Boat Commission. This discharge is not expected to affect public water supplies.

Curtiss Wright EPD is an industrial facility that manufactures, repairs, and tests engineered pumps. The facility primarily consists of assembly, painting, and testing of the pumps. There are two pump testing locations at the facility. At each of these test locations city water is run through a series of pipes connected to the pump being tested. The water used in the tests is sampled before being discharged at internal monitoring points (IMP 101 and IMP 201). This test water runs through an underground conveyance system that discharges into a rain garden outside.

All stormwater onsite drains to one of five rain gardens or three dry extended basins either by sheet flow or by a drainage conveyance system. Flow from the rain gardens all drain to the basins. The basins are designed to hold up to a 100-year storm event. Overflow would be directed to the facility's stormwater pipe collection system and would ultimately discharge to Outfall 001 and into the City's stormwater collection system. The collection system drains to Saucon Creek. Outfall 001 is located at the western edge of the property and is accessed by removing a manhole cover.

The facility is categorized by SIC code 3561 (Manufacturing – Pumps and Pumping Equipment) and falls under Appendix J monitoring requirements of the PAG-03 General Permit. Semi-annual monitoring and reporting for Total Suspended Solids (TSS) and Oil & Grease are required under the PAG-03. The pH monitoring and reporting has been carried over from the

Approve	Deny	Signatures	Date
X		/s/ Allison Seyfried / Project Manager	September 28, 2022
X		/s/ Amy M. Bellanca, P.E. / Environmental Engineer Manager	10-6-22

Summary of Review

previous permit and updated to a semi-annual frequency. Monitoring and reporting requirements for Total Kjeldahl Nitrogen and Total Iron have been removed from the permit as per updated requirements under Appendix J.

Benchmark values exist for TSS and Oil & Grease. A benchmark value is the concentration of a pollutant in stormwater discharges that serves as a threshold for the determination of whether existing site BMPs are effective in controlling stormwater pollution. The benchmark values can be found in Part C. II. F. of the permit. A corrective action plan must be submitted to DEP if the discharge concentration for the parameters exceed the benchmark values for two or more consecutive monitoring periods.

IMP 101 and 201 must be sampled by the permittee for the discharge of the non-process pump test water. The data must be reported on a monthly basis. The limits for IMP 101 and 201 are based on the PAG-10 General Permit for hydrostatic testing. Monitoring and reporting for Dissolved Oxygen and Total Suspended Solids (TSS) has been added to the permit to be consistent with the parameters on the PAG-10, which was last updated in January 2022.

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

The previously issued permit expired on December 31, 2021 and the renewal application was not received until September 29, 2021. An incorrect permit application was submitted and was very deficient. The application was not accepted until April 26, 2022.

A Water Management System Inspection query was performed and indicated on December 9, 2019 a Routine/Partial Inspection was performed.

There are currently two open violations for this facility that may need to be resolved before issuance of the final permit:

1. 01/24/2022 - Violation ID 942815 – Violation Code: 92A.75(A) – NPDES-Failure to submit NPDES renewal application at least 180 days prior to expiration or later approved date.
2. 01/24/2022 - Violation ID 942816 – Violation Code: 92A.41(A)12B – NPDES-Failure to submit monitoring report(s) or properly complete monitoring reports.

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.

