

Application Type New  
Facility Type Stormwater  
Major / Minor Minor

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

Application No. PA0276545  
APS ID 1056316  
Authorization ID 1384354

**Applicant and Facility Information**

Applicant Name	<u>Ungerer &amp; Company</u>	Facility Name	<u>Ungerer &amp; Company – Bethlehem Plant</u>
Applicant Address	<u>110 North Commerce Way Bethlehem, PA 18017-8932</u>	Facility Address	<u>110 &amp; 116 North Commerce Way Bethlehem, PA 18017-8932</u>
Applicant Contact	<u>Kevin Langer, Site Head</u>	Facility Contact	<u>Angie Frederick, - Environmental, Health, and Safety Manager</u>
Applicant Phone	<u>(610) 868-7266</u>	Facility Phone	<u>(610) 868-7266</u>
Client ID	<u>61456</u>	Site ID	<u>485810</u>
SIC Code	<u>2087</u>	Municipality	<u>Hanover Township</u>
SIC Description	<u>Manufacturing - Flavoring Extracts And Syrups, Nec</u>	County	<u>Northampton</u>
Date Application Received	<u>February 4, 2022</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>February 16, 2022</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>Application for new NPDES permit for discharge of stormwater associated with industrial activity.</u>		

**Summary of Review**

The applicant is requesting a new NPDES permit to discharge stormwater associated with industrial activity to an Unnamed Tributary 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 site is 10.41 acres of land within the Lehigh Valley Industrial Park (LVIP) and consists of two buildings (separated by approximately 330 feet) that are used for manufacturing flavors and fragrance specialty ingredients for industrial clients. The site also consists of paved driveways, paved loading/unloading zones docks, paved parking, pervious grassed areas, and associated stormwater management.

The 110 North Commerce Way Building (110 Building) is approximately 87,900 SF and is the main manufacturing building. It contains administrative offices, a quality control laboratory, several areas for material manufacturing activities, warehousing, and product shipping operations.

The 116 North Commerce Way Building (116 Building) is approximately 48,600 SF and is used for manufacturing fragrances and warehousing operations. This building also receives incoming materials for the site operations and has a hazardous waste storage area located inside the building.

The area between the two buildings is mostly paved impervious surfaces. Incoming materials are received at the loading docks located at the northern building and finished products are shipped from the southern building loading docks. Both buildings store various amounts of types of oils, juices, chemicals, etc. necessary for the facility operations. All materials are stored inside. However, occasionally materials in drum or tote containers are transported between the buildings via forklifts. It

Approve	Deny	Signatures	Date
X		/s/ Allison Seyfried / Environmental Engineering Specialist	June 21, 2022
X		/s/ Amy M. Bellanca, P.E. / Environmental Engineer Manager	7-6-22

### Summary of Review

is during this transportation and loading/unloading that a container could be damaged and the material inside could be exposed to stormwater.

The permit application lists seven outfalls at the site. Sampling was not completed for all outfalls; representative outfalls were listed. A conference call was conducted on March 7, 2022 with DEP and the permittee to discuss the outfalls and stormwater at the site. The Stormwater Pollution Prevention Plan (SWPPP) lists three outfalls (Outfalls 001, 003, and 004) as discharging to the storm sewer system. The permittee explained that Outfall 003 is representative of the stormwater for the facility and that if a spill that was large enough to migrate offsite were to occur when materials were being transferred between the two buildings, Outfall 003 is where it would be identified. Outfall 003 also includes the drainage for most of the loading/unloading areas. Outfall 004 only receives a very small amount of stormwater from the paved parking area of the western side of Building 110. Outfall 001 mostly receives runoff from the roof of Building 110 and the very southern area of the property. No chemical storage or material handling is conducted in this area. Outfall 001 does not flow through Outfall 003. However, Outfall 001 is the last outfall before the stormwater discharges completely offsite through the LVIP storm sewer system. The Site Drainage Map has been included on page 3 of this fact sheet for reference.

The majority of the site is also surrounded by soil berms or drainage ditches. Sheet flow that drains to the grassy areas around the site are directed by the surface drainage features to either a retention basin located in the northwest corner of the property or to the subsurface infiltration area located on the eastern portion of the site. During periods of high precipitation that cannot be handled by the infiltration area, stormwater is discharged through a subsurface oil/water separator (OWS) (designated as Outfall 005) and then discharged to Outfall 003. Two additional OWSs are located within the drainage system for the truck loading/unloading areas to contain any product that may be released due to a spill or release.

Semiannual sampling will be required at Outfall 003 and 001. The remaining outfalls will be listed in the permit, but the sampling frequency will be "Upon Request". If issues arise onsite or DEP inspects the site and determines the conditions are not representative of what was expressed in the application, then it will be easy to require sampling at these additional outfalls.

The facility is categorized by SIC code 2087 (Manufacturing – Flavoring Extracts and Syrups) and falls under Appendix I monitoring requirements of the PAG-03 General Permit. Semi-annual monitoring and reporting for pH, 5-Day Biochemical Oxygen Demand (BOD5), Total Suspended Solids (TSS), Chemical Oxygen Demand (COD), Nitrate + Nitrite-Nitrogen, and Oil & Grease are required under this permit.

Benchmark values exist for TSS, COD, 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. V. 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.

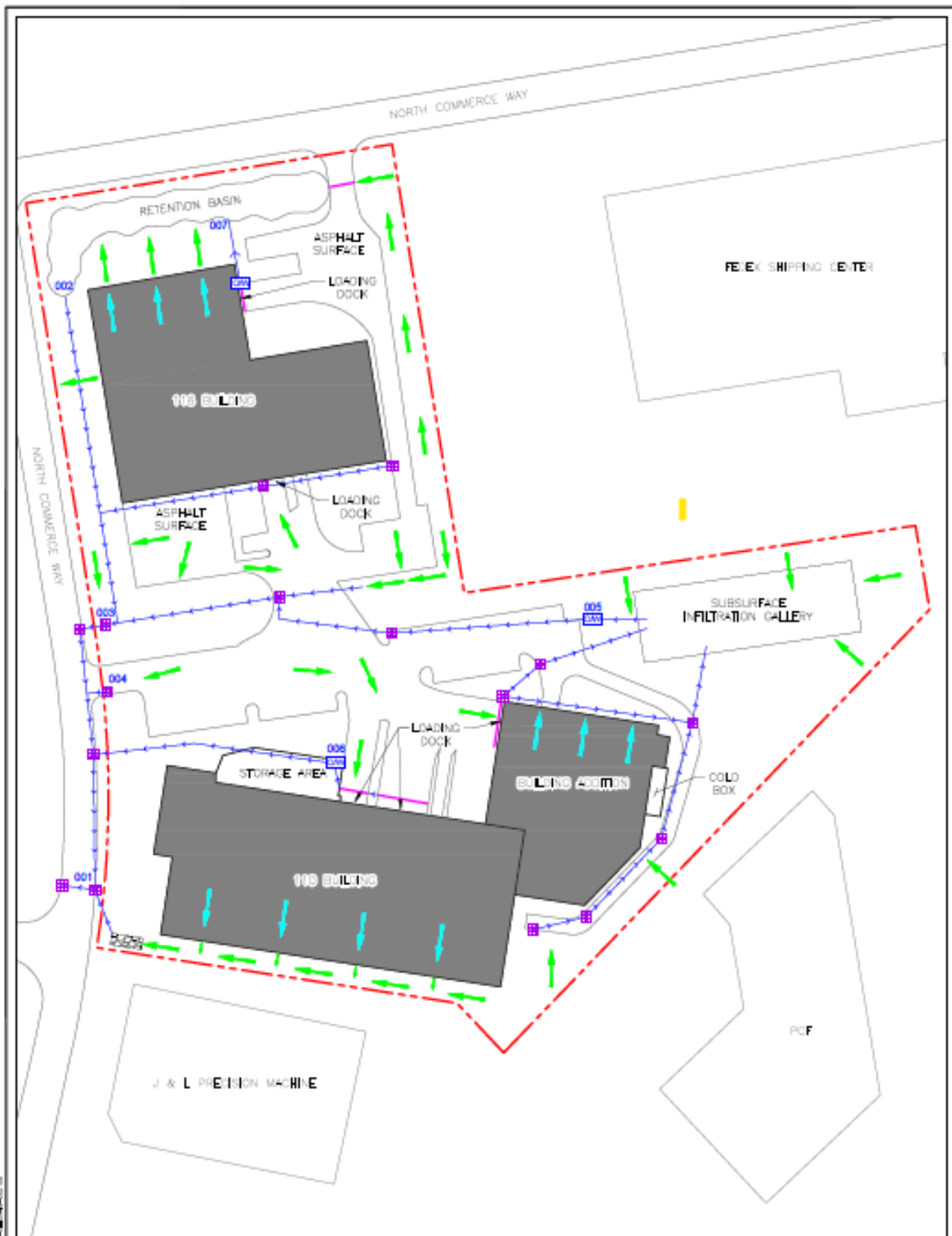
An Anti-Degradation Module was completed and submitted as part of this permit application. The non-discharge alternatives proposed in the Module are considered infeasible because they are cost prohibitive, technically infeasible, or environmentally unsound.

The SWPPP provided with the application states that the outfalls and drains located across the property will be visually inspected weekly and that documented visual inspections will be conducted at least once a month.

PPC Plan implementation and completion of an annual inspection and compliance evaluation are required under the permit. There are currently no open violations for this client that warrant withholding issuance of the 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.



- EXPLANATION**
- APPROXIMATE PROPERTY BOUNDARY
  - SUBSURFACE STORMWATER DRAIN LINE
  - SURFACE DRAINAGE FLOW
  - ROOF DRAINAGE FLOW
  - 001 SUBSURFACE OILWATER SEPARATOR
  - 002 DRAIN INLET
  - 001 RIPRAP
  - 001 OUTFALL LOCATION AND DESIGNATION



 Newberry's 1282 Commerce Drive Lanark, Virginia 22078 www.trihydro.com P: 541/662-4111 F: 541/662-7298	<b>FIGURE 3</b>
	<b>SITE DRAINAGE PATTERNS</b>
	<b>STORMWATER POLLUTION PREVENTION (SWPP) PLAN                  UNGERER AND COMPANY                  BETHLEHEM, PENNSYLVANIA</b>
Drawn By: JLP	Checked By: DM
Scale: 1" = 100'	Date: 3/18/2021
	File: S2A-PA-067H-SWPP-02103