

Application Type New
Facility Type Storm Water
Major / Minor Minor

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

Application No. PA0277011
APS ID 1146391
Authorization ID 1542376

Applicant and Facility Information

Applicant Name	<u>Freshpet Inc.</u>	Facility Name	<u>Freshpet Inc.</u>
Applicant Address	<u>176 N Commerce Way</u> <u>Bethlehem, PA 18017-8614</u>	Facility Address	<u>176 N Commerce Way</u> <u>Bethlehem, PA 18017-8614</u>
Applicant Contact	<u>Brandon Tomasovich</u>	Facility Contact	<u>Brandon Tomasovich</u>
Applicant Phone	<u>(970) 590-4204</u>	Facility Phone	<u>(970) 590-4204</u>
Client ID	<u>307266</u>	Site ID	<u>810761</u>
SIC Code	<u>2047</u>	Municipality	<u>Hanover Township</u>
SIC Description	<u>Manufacturing - Dog And Cat Food</u>	County	<u>Northampton</u>
Date Application Received	<u>September 16, 2025</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>October 15, 2025</u>	If No, Reason	<u></u>
Purpose of Application	<u>New Facility seeking NPDES Coverage for discharging Industrial Stormwater to HQ Water</u>		

Summary of Review

The applicant is requesting a new NPDES Permit to discharge Stormwater associated with Industrial Activity to Tributary 03388 of Monocacy Creek, which is a HQ-CWF, MF (High Quality – Cold Water Fishes, Migratory Fishes) designated receiving stream to State Water Plan Basin 2-C – Lower Lehigh Valley. As per the Department's current existing use list, this receiving stream does not have an existing use classification that is more protective than its designated use. Tributary 03388 of Monocacy Creek is impaired due to pathogens for its designated use of Recreational. It is supporting for its designated use of Aquatic Life.

Monocacy Creek is impaired for its designated use of aquatic life due to agriculture and urban runoff/storm sewers. It is impaired for its designated use of Recreational due to pathogens.

The applicant is a dog and cat food manufacturing company that processes raw meats and materials into a final product. A wastewater treatment facility on the property processes excess material and water before being sent to the city. Semi-trucks are used to transport raw materials to the facility and final products off the facility. The permit application indicates the facility is categorized by SIC code 2047 (Manufacturing- Dog and Cat Food) and NAICS Code 311111 (Manufacturing – Dog and Cat Food). The facility falls under the Appendix I monitoring requirements of the PAG-03 General Permit. The benchmark values for this appendix are as follows:

- 1) Total Nitrogen has to be reported.
- 2) Total Phosphorous has to be reported.
- 3) pH has a benchmark value of 9.0.
- 4) BOD5 has a benchmark value of 30 mg/L.
- 5) Total Suspended Solids has a benchmark value of 100 mg/L.
- 6) COD has a benchmark value of 120 mg/L.
- 7) Nitrate + Nitrite-Nitrogen has to be reported.
- 8) Oil and Grease has a benchmark value of 30 mg/L.

Approve	Deny	Signatures	Date
X		<i>Melanie Macioce</i> Melanie Macioce / Environmental Engineering Trainee	October 16, 2025
X		<i>Edward Dudick</i> Edward Dudick, P.E. / Environmental Engineer Manager	October 20, 2025

Summary of Review

All pollutants will be sampled once every 6 months. pH, Total Suspended Solids, Total Phosphorous, and Total Zinc will be sampled via grab sample. Total Nitrogen will be sampled via calculation.

Outfall 001 is exposed to exhaust fans, HVAC units, parking areas, dumpsters, storage trailers and generators. This is the only outfall located on site.

In regard to their anti-degradation analysis, the review of the site and potential issues to protect the HQ water of Monocacy Creek was thorough. There are two main ways stormwater exits the site:

- 1) Rip rap and a vegetated swale. This slows down the runoff flow and allows for more sediment to settle.
- 2) The applicant has a recycled stormwater system that feeds their irrigation system via an underground tank.

According to correspondence with the applicant, it takes a "good rain event" for any water to flow off the property. They took over operation of one facility and parking lot in 2014. In 2019, another 140,000 square feet of building space was added to the site. The property "virtually doubled". No additional exposure to pollutants was incurred, however, the volume of stormwater leaving the site increased. According to the applicant, the rip/rap and vegetation have sufficed thus far. A curb was installed on the southside of the parking lot and south side of the new building to break up sheet flow. On the west side of the new building, there is a grassy swale with storm drains.

The applicant considered the following non-discharge alternatives infeasible:

- Pollution Prevention and Process Changes: This is infeasible due to property and processes being established.
- Alternate Project Sitting: The construction on project is complete.
- Alternative Discharge Locations: The swale is the lowest point on property and the only place for water to discharge.
- Constructed Treatment Wetlands: There is limited space on property and too much runoff.

The applicant does use land application of stormwater and recycle/reuse of stormwater via their underground tank that supplies an irrigation system with stormwater.

Treatment BMPs for the site consist of a vegetated swale. Pollution Prevention for the site consists of a PPC Plan. Land disposals consist of vegetated filters and riparian buffers. Stormwater Reuse Technology consists of spray/drip irrigation.

The applicant provided sufficient information, reasoning and documentation of current BMPs. Anti-degradation was met.

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

There are no open violations or inspection records as this is a new client.

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	Design Flow (MGD)	0
Latitude	40° 40' 24.11"	Longitude	-75° 22' 10.39"
Quad Name		Quad Code	
Wastewater Description: Stormwater			
Receiving Waters	Tributary 03388 to Monocacy Creek (HQ-CWF, MF)	Stream Code	03388
NHD Com ID	26294115	RMI	0.397
Drainage Area	0.0811	Yield (cfs/mi ²)	-
Q ₇₋₁₀ Flow (cfs)	0.00811	Q ₇₋₁₀ Basis	-
Elevation (ft)	345.41	Slope (ft/ft)	-
Watershed No.	2-C	Chapter 93 Class.	HQ-CWF, MF
Existing Use	-	Existing Use Qualifier	-
Exceptions to Use	-	Exceptions to Criteria	-
Assessment Status	Attaining Use(s)		
Cause(s) of Impairment			
Source(s) of Impairment	Pathogens		
TMDL Status		Name	
Background/Ambient Data		Data Source	
pH (SU)	-		-
Temperature (°F)	-		-
Hardness (mg/L)	-		-
Other:	-		-
Nearest Downstream Public Water Supply Intake	Bethlehem City Water System		
PWS Waters	Monocacy Creek	Flow at Intake (cfs)	20.2
PWS RMI	2.28	Distance from Outfall (mi)	4.44

Changes Since Last Permit Issuance: N/A

Other Comments: N/A