

Application Type New
Facility Type Storm Water
Major / Minor Minor

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

Application No. PA0277029
APS ID 1147250
Authorization ID 1543872

Applicant and Facility Information

| | | | |
|---------------------------|-------------------------------------------------------------------------------------------------|------------------|---------------------------------------------------------|
| Applicant Name | <u>Airlite Plastics Co.</u> | Facility Name | <u>Airlite Plastics Company</u> |
| Applicant Address | <u>2860 Bath Pike</u> <u>Nazareth, PA 18064-8898</u> | Facility Address | <u>2860 Bath Pike</u> <u>Nazareth, PA 18064-8898</u> |
| Applicant Contact | <u>Tony Alfieri</u> | Facility Contact | <u>Tony Alfieri</u> |
| Applicant Phone | <u>(610) 365-8508</u> | Facility Phone | <u>(610) 365-8508</u> |
| Client ID | <u>302198</u> | Site ID | <u>776155</u> |
| SIC Code | <u>3089</u> | Municipality | <u>Upper Nazareth Township</u> |
| SIC Description | <u>Manufacturing - Plastics Products, Nec</u> | County | <u>Northampton</u> |
| Date Application Received | <u>September 29, 2025</u> | EPA Waived? | <u>Yes</u> |
| Date Application Accepted | <u>October 1, 2025</u> | If No, Reason | <u></u> |
| Purpose of Application | <u>Application for Individual NPDES Permit – 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 two unnamed tributaries of East Branch Monocacy Creek. There are 3 outfalls on the site. Outfall 001 and 002 discharge to Tributary 03395 of East Branch Monocacy Creek which is a HQ, CWF-MF (High-Quality, Cold-Water Fishes, Migratory Fishes) designated receiving stream to State Water Plan Basin 02-C Lower Lehigh River. 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 03395 of East Branch Monocacy Creek is supporting for its designated use of Aquatic Life.

Outfall 003 discharges to Tributary 03394 of East Branch Monocacy Creek which is a HQ, CWF-MF (High-Quality, Cold-Water Fishes, Migratory Fishes) designated receiving stream to State Water Plan Basin 02-C Lower Lehigh River. 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 03394 of East Branch Monocacy Creek is supporting for its designated use of Aquatic Life.

East Branch of Monocacy Creek is impaired for its designated uses. It is impaired due to pathogens for its designated use of Recreational. It is impaired due to crop production for its designated use of Aquatic Life.

The permit application indicated the facility is categorized as SIC code 3089 (Manufacturing – Plastic Products). The facility falls under Appendix S of the PAG-03 General Permit. The benchmark values for this appendix are as follows:

- 1) pH has benchmark value of 9.0.
- 2) Total Suspended Solids has a benchmark value of 100 mg/L.
- 3) Total Nitrogen value needs to be reported.
- 4) Total Phosphorous value needs to be reported.
- 5) Total Zinc value needs to be reported.

| Approve | Deny | Signatures | Date |
|---------|------|-------------------------------------------------------------------------------|-----------------|
| X | | <i>Melanie Macioce</i> Melanie Macioce / Environmental Engineering Trainee | October 6, 2025 |
| X | | <i>Edward Dudick</i> Edward Dudick, P.E. / Environmental Engineer Manager | October 6, 2025 |

Summary of Review

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

Outfall 001's discharge is exposed to finished products, wooden pallets, gravel/soil fill storage, and plastic granules. It also receives drainage from the roof drains. There are two detention basins that filter to Outfall 001.

Outfall 002's discharge is exposed to truck loading/offloading, trash compactors, plastic granules, and heating oil AST. There is one detention basin that filters to Outfall 002.

The applicant requested Outfall 003 be classified as no exposure. Outfall 003 is located on the southern portion of the site and is exposed to staff vehicle parking. The discharge is filtered through a vegetated swale and is 62% impervious. No industrial activities occur at this portion of the site. Therefore, the no exposure request for Outfall 003 will be allowed. Samples taken from Outfall 001 and 002 will be considered representative of the site. These outfalls are exposed to industrial activity and have the highest chance to pollute.

The applicant is discharging to a high-quality water which required a Module 1 – Anti-Degradation Form to be submitted. The eliminated non-discharge alternatives are as follows:

- Alternative Project Siting: This location is already built. The permit to discharge is new. It would be cost prohibitive to switch site locations of an operational facility.
- Land Application of Stormwater: The soil located on site have limited, if not infeasible, infiltration properties according to the USDA Soil Map.
- Alternate Discharge Locations: There is a feasible option to discharge to a MS4 System that runs parallel to the street the site is located on. However, this sewer discharges to the same tributary as discharging directly from site.

The feasible non-discharge alternatives are listed below as well as the reason they were not pursued.

- Pollution Prevention and Process Changes: The applicant suggested installation of permeant covers to reduce exposure. It was not pursued due to site restrictions and cost.
- Recycle/Reuse of Stormwater: The applicant suggested rainwater harvesting via a storage tank. This was not selected due to the potential need for treatment of the water and the associated costs with altering the site.
- Constructed Treatment Wetlands: The applicant suggested turning stormwater basins into constructed wetlands. This was deemed infeasible due to cost and the potential need for a downstream basin to still meet regulatory requirements.

Onsite there are presently vegetated swales and detention basins as BMPs. A PPC Plan outlines their existing pollution prevention efforts. Anti-degradation was met due to the thorough narrative, explanation of site, and appropriate reasoning for not incorporating non-discharge alternatives.

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° 44' 10.47" | Longitude | -75° 20' 32.34" |
| Quad Name | | Quad Code | |
| Wastewater Description: Stormwater | | | |
| Receiving Waters | Tributary 03395 of East Branch Monocacy Creek (HQ-CWF, MF) | Stream Code | 03395 |
| NHD Com ID | 26294181 | RMI | 0.1000 |
| Drainage Area | 0.8 | Yield (cfs/mi ²) | - |
| Q ₇₋₁₀ Flow (cfs) | 0.08 | Q ₇₋₁₀ Basis | - |
| Elevation (ft) | 434.4 | Slope (ft/ft) | 0.017 |
| 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 | | | |
| 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) | 11.61 |

Changes Since Last Permit Issuance: N/A

Other Comments: N/A

Discharge, Receiving Waters and Water Supply Information

| | | | |
|-----------------------------------------------|-------------------------------------------------------------------|------------------------------|------------------------|
| Outfall No. | <u>002</u> | Design Flow (MGD) | <u>0</u> |
| Latitude | <u>40° 44' 7.82"</u> | Longitude | <u>-75° 20' 34.68"</u> |
| Quad Name | <u></u> | Quad Code | <u></u> |
| Wastewater Description: <u>Stormwater</u> | | | |
| Receiving Waters | <u>Tributary 03395 of East Branch Monocacy Creek (HQ-CWF, MF)</u> | Stream Code | <u>03395</u> |
| NHD Com ID | <u>26294181</u> | RMI | <u>0.0400</u> |
| Drainage Area | <u>0.82</u> | Yield (cfs/mi ²) | <u>-</u> |
| Q ₇₋₁₀ Flow (cfs) | <u>0.082</u> | Q ₇₋₁₀ Basis | <u>-</u> |
| Elevation (ft) | <u>427.39</u> | Slope (ft/ft) | <u>0.0122</u> |
| Watershed No. | <u>2-C</u> | Chapter 93 Class. | <u>HQ-CWF, MF</u> |
| Existing Use | <u>-</u> | Existing Use Qualifier | <u>-</u> |
| Exceptions to Use | <u>-</u> | Exceptions to Criteria | <u>-</u> |
| Assessment Status | <u>Attaining Use(s)</u> | | |
| Cause(s) of Impairment | <u></u> | | |
| Source(s) of Impairment | <u></u> | | |
| TMDL Status | <u></u> | Name | <u></u> |
| Background/Ambient Data | | | |
| pH (SU) | <u>-</u> | Data Source | <u>-</u> |
| Temperature (°F) | <u>-</u> | | <u>-</u> |
| Hardness (mg/L) | <u>-</u> | | <u>-</u> |
| Other: | <u>-</u> | | <u>-</u> |
| Nearest Downstream Public Water Supply Intake | <u>Bethlehem City Water System</u> | | |
| PWS Waters | <u>Monocacy Creek</u> | Flow at Intake (cfs) | <u>20.2</u> |
| PWS RMI | <u>2.28</u> | Distance from Outfall (mi) | <u>11.55</u> |

Changes Since Last Permit Issuance: N/A

Other Comments: N/A

Discharge, Receiving Waters and Water Supply Information

| | | | |
|-----------------------------------------------|-------------------------------------------------------------------|------------------------------------|------------------------|
| Outfall No. | <u>003</u> | Design Flow (MGD) | <u>0</u> |
| Latitude | <u>40° 44' 4.26"</u> | Longitude | <u>-75° 20' 36.14"</u> |
| Quad Name | <u></u> | Quad Code | <u></u> |
| Wastewater Description: <u>Stormwater</u> | | | |
| Receiving Waters | <u>Tributary 03994 to East Branch Monocacy Creek (HQ-CWF, MF)</u> | Stream Code | <u>03994</u> |
| NHD Com ID | <u>26294173</u> | RMI | <u>1.7400</u> |
| Drainage Area | <u>3.82</u> | Yield (cfs/mi ²) | <u>-</u> |
| Q ₇₋₁₀ Flow (cfs) | <u>0.382</u> | Q ₇₋₁₀ Basis | <u>-</u> |
| Elevation (ft) | <u>421.69</u> | Slope (ft/ft) | <u>0.0143</u> |
| Watershed No. | <u>2-C</u> | Chapter 93 Class. | <u>HQ-CWF, MF</u> |
| Existing Use | <u>-</u> | Existing Use Qualifier | <u>-</u> |
| Exceptions to Use | <u>-</u> | Exceptions to Criteria | <u>-</u> |
| Assessment Status | <u>Attaining Use(s)</u> | | |
| Cause(s) of Impairment | <u></u> | | |
| Source(s) of Impairment | <u></u> | | |
| TMDL Status | <u></u> | Name | <u></u> |
| Background/Ambient Data | | | |
| pH (SU) | <u>-</u> | Data Source | <u>-</u> |
| Temperature (°F) | <u>-</u> | | <u>-</u> |
| Hardness (mg/L) | <u>-</u> | | <u>-</u> |
| Other: | <u>-</u> | | <u>-</u> |
| Nearest Downstream Public Water Supply Intake | | <u>Bethlehem City Water System</u> | |
| PWS Waters | <u>Monocacy Creek</u> | Flow at Intake (cfs) | <u>20.2</u> |
| PWS RMI | <u>2.28</u> | Distance from Outfall (mi) | <u>11.48</u> |

Changes Since Last Permit Issuance: N/A

Other Comments: N/A