



Application Type  
Facility Type  
Major / Minor

New  
Storm Water  
Minor

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

Application No. **PA0277070**  
APS ID **1153025**  
Authorization ID **1553438**

**Applicant and Facility Information**

Applicant Name	<b>Palmer Plastics Inc.</b>	Facility Name	<b>Palmer Plastics Inc.</b>
Applicant Address	2906 William Penn Highway, Suite 505 Easton, PA 18045-5256	Facility Address	2906 William Penn Highway Easton, PA 18045-5256
Applicant Contact	Robert Skuba	Facility Contact	Robert Skuba
Applicant Phone	(610) 330-9900	Facility Phone	(610) 330-9900
Client ID	397185	Site ID	885334
SIC Code	3809	Municipality	Palmer Township
SIC Description	Plastics Products, Not Elsewhere Classified	County	Northampton
Date Application Received	December 22, 2025	EPA Waived?	Yes
Date Application Accepted		If No, Reason	
Purpose of Application	Application for New Individual Industrial Stormwater NPDES Permit		

**Summary of Review**

The permittee is applying for a new individual industrial stormwater NPDES permit PA0277070 to discharge stormwater associated with industrial activity to tributary 4625 to Bushkill Creek. The receiving stream is a High-Quality, Cold-Water Fishes, Migratory Fishes (HQ-CWF, MF) stream in state water plan 01F (Jacoby – Bushkill Creeks). Tributary 4625 to Bushkill Creek is attaining all existing and designated uses, and is not part of a TMDL. The permittee's stormwater discharge is not expected to contribute to any degradation of the stream.

The Palmer Plastics Inc. facility is a pelletized plastics manufacturer located at 2906 William Penn Hwy, Easton, PA. The permittee reports on the application no raw materials or potential contaminants are being stored outside or exposed to stormwater, which is consistent with the site maps and aerial view provided. The facility is covered under SIC code 3809 – Plastics Products, Not Elsewhere Classified, and the PAG-03 Appendix S is applicable.

The table below shows the monitoring requirements on the draft permit being issued which are established in the PAG-03 Appendix S. Benchmarks are not effluent limitations and exceedances do not result in permit violations. If the permittee has consistent benchmark exceedances over two or more monitoring periods, a corrective action plan must be developed in accordance with Part C.III.G of the NPDES permit.

Pollutant	Monitoring Requirements		Benchmark Values
	Minimum Measurement Requirements	Sample Type	
Total Nitrogen (mg/L)	1 / 6 Months	Calculation	XXX
Total Phosphorus (mg/L)	1 / 6 Months	Grab	XXX
pH (S.U.)	1 / 6 Months	Grab	9.0
Total Suspended Solids (mg/L)	1 / 6 Months	Grab	100
Total Zinc (mg/L)	1 / 6 Months	Grab	XXX

Approve	Deny	Signatures	Date
X		<i>Luca Jordache</i> Luca Jordache / Environmental Engineering Trainee	January 7, 2026
X		<i>Edward Dudick</i> Edward Dudick, P.E. / Environmental Engineer Manager	January 8, 2026

### Summary of Review

The stormwater sampling data provided by the permittee in the application indicated high fecal coliform at outfall 001 at 800 mg/L. Due to this high concentration in the discharge, but inconsistent nature of it, a monitoring requirement has been included to report fecal coliform concentration. If fecal coliform is consistently an issue, or gets worse, the permittee may be required to implement a BMP to reduce the concentration in the discharge.

The following documents were used or created to aid in writing this permit:



Watershed  
Information.pdf



Appendix S.pdf



Lab Sample  
Data.pdf



Industrial Waste  
and Stormwater SOI

### 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.

<b>Discharge Information</b>	
Outfall No: 001	Design Flow (MGD): 0
Latitude: 40° 41' 41.56"	Longitude: -75° 15' 42.27"
Wastewater Description: Stormwater	
<b>Receiving Waters Information</b>	
Receiving Waters: Tributary 4625 to Bushkill Creek (HQ-CWF, MF)	Stream Code: 4625
NHD Com ID: 26046326	RMI: 0.75
Drainage Area: 2.34	Yield (cfs/mi <sup>2</sup> ): 0.224
Q <sub>7-10</sub> Flow (cfs): ~0.524	Q <sub>7-10</sub> Basis: Calculation
Elevation (ft): 301	Slope (ft/ft): 0.015
Watershed No: 1-F	Chapter 93 Class: HQ-CWF, MF
Assessment Status	Attaining Use(s)
<b>Water Supply Information</b>	
Nearest Downstream Public Water Supply Intake: Riegelsville Water Authority	
PWS Waters: Delaware River	Flow at Intake (cfs): 1661
PWS RMI: 132	Distance from Outfall (mi): 12.9

**Proposed Effluent Limitations and Monitoring Requirements**

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (386-0400-001), SOPs and/or BPJ.

**Outfall 001, Effective Period: Permit Effective Date through Permit Expiration Date.**

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Semi-Annual Average	Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	XXX	Report (Benchmark: 9.0)	1/6 months	Grab
TSS	XXX	XXX	XXX	Report (Benchmark: 100)	XXX	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	Report	XXX	XXX	1/6 months	Calculation
Total Phosphorus	XXX	XXX	XXX	Report	XXX	XXX	1/6 months	Grab
Total Zinc	XXX	XXX	XXX	Report	XXX	XXX	1/6 months	Grab
Fecal Coliform	XXX	XXX	XXX	Report	XXX	XXX	1/6 months	Grab

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**Outfall 002, Effective Period: Permit Effective Date through Permit Expiration Date.**

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Semi-Annual Average	Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	XXX	Report (Benchmark: 9.0)	1/6 months	Grab
TSS	XXX	XXX	XXX	Report (Benchmark: 100)	XXX	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	Report	XXX	XXX	1/6 months	Calculation
Total Phosphorus	XXX	XXX	XXX	Report	XXX	XXX	1/6 months	Grab
Total Zinc	XXX	XXX	XXX	Report	XXX	XXX	1/6 months	Grab
Fecal Coliform	XXX	XXX	XXX	Report	XXX	XXX	1/6 months	Grab

**Proposed Effluent Limitations and Monitoring Requirements**

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**Outfall 003, Effective Period: Permit Effective Date through Permit Expiration Date.**

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Semi-Annual Average	Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	XXX	Report (Benchmark: 9.0)	1/6 months	Grab
TSS	XXX	XXX	XXX	Report (Benchmark: 100)	XXX	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	Report	XXX	XXX	1/6 months	Calculation
Total Phosphorus	XXX	XXX	XXX	Report	XXX	XXX	1/6 months	Grab
Total Zinc	XXX	XXX	XXX	Report	XXX	XXX	1/6 months	Grab
Fecal Coliform	XXX	XXX	XXX	Report	XXX	XXX	1/6 months	Grab