

Application Type  
Facility Type  
Major / Minor

New  
Storm Water  
Minor

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

Application No. **PA0281981**  
APS ID **1137351**  
Authorization ID **1527232**

**Applicant and Facility Information**

Applicant Name	<b>FM Browns Sons Inc.</b>	Facility Name	<b>Brown's Feeds</b>
Applicant Address	205 Woodrow Avenue	Facility Address	127 S Furnace Street PO Box 67
	Sinking Spg, PA 19608-1402		Birdsboro, PA 19508-2340
Applicant Contact	Phillip Brown	Facility Contact	Phillip Brown
Applicant Phone	(610) 575-0477	Facility Phone	(610) 575-0477
Client ID	80147	Site ID	880130
SIC Code	2048	Municipality	Birdsboro Borough
SIC Description	Manufacturing - Prepared Feeds, Nec	County	Berks
Date Application Received	May 14, 2025	EPA Waived?	Yes
Date Application Accepted	May 22, 2025	If No, Reason	
Purpose of Application	NPDES discharge of stormwater associated with industrial activity.		

**Summary of Review**

This is an application for a NPDES individual permit for discharges of stormwater associated with industrial activity located in Birdsboro Borough, Berks County. See Figures 1, 2, and 3 for Site Location, a Site Diagram, and a Drainage Area Diagram.

The facility's SIC code is 2048 (prepared feeds, nec.) which requires a NPDES permit for discharges of stormwater associated with industrial activity. Since the facility discharges to an EV surface water, the facility does not qualify for a PAG-03 general permit. Therefore, the facility must be covered under an individual permit for discharges of stormwater associated with industrial activity. If the facility qualified for a PAG-03, they would fall under Appendix I (food and kindred products) based on their SIC code.

Facility Description: Brown's Feeds produces prepared farm feed for various animals. The majority of operations and material storage occurs indoors or undercover. Filling to and from the UST and ASTs occurs within the facility drainage areas. Product feed silos are outdoors but truck loading occurs under cover.

An application was received on 5/14/2025 via PUP 318018. The application was deemed complete on 5/22/2025.

The facility has three outfalls: Outfall 001, Outfall 002, and Outfall 003. The majority of industrial activity occurs within the drainage area of Outfall 001, which includes the mill, ASTs, silos, and feed loading. Runoff within Outfall 001's drainage area flows south and east via inlets and surface flow to a stormwater detention basin. Outfall 001 discharges from the detention basin to Hay Creek (EV, MF) in the event of significant rainfall. Outfall 002's drainage area includes the warehouse and the diesel fuel UST. Runoff within Outfall 002's drainage area flows south along impervious surfaces and east through a stormwater conveyance to Outfall 002 and then to Hay Creek (EV, MF). Outfall 003's drainage area is primarily roof and driveway runoff that flows east off-site, eventually to Hay Creek (EV, MF). Outfall 003 is a no exposure outfall.

The PPC Plan was last updated April 2025.

Approve	Deny	Signatures	Date
X		Jacob S. Rakowsky Jacob S. Rakowsky, E.I.T. / Project Manager	5/27/2025
X		Scott M. Arwood Scott M. Arwood, P.E. / Environmental Engineer Manager	5/28/2025

### **Summary of Review**

Part C permit conditions require semi-annual site inspections as well as implementation of BMPs and implementation of the facility PPC Plan. Given the BMPs in place, the discharge is not expected to have any measurable effect on the water quality of the receiving stream.

EPA waiver is in effect.

#### **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)	N/A (stormwater)
Latitude	40° 15' 40.88"	Longitude	-75° 48' 18.92"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Hay Creek (EV, MF)	Stream Code	1772
NHD Com ID	25963496	RMI	0.81
Drainage Area	22 sq. mi.	Yield (cfs/mi <sup>2</sup> )	
Q <sub>7-10</sub> Flow (cfs)	2.7	Q <sub>7-10</sub> Basis	StreamStats
Watershed No.	3-C	Chapter 93 Class.	EV, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	PATHOGENS		
Source(s) of Impairment	SOURCE UNKNOWN		
TMDL Status		Name	
Nearest Downstream Public Water Supply Intake	Pottstown Borough Water Authority		
PWS Waters	Schuylkill River	Municipality	West Pottsgrove Twp, Montgomery County
PWS RMI	57.0	Distance from Outfall (mi)	7

Drainage Area (sf): 122,000

% Impervious: 60%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:  
Truck unloading/loading, roof drainage, parking, feed additive storage tanks, waste dumpster, ASTs

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:  
Detention Basin, PPC Plan

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	002	Design Flow (MGD)	N/A (stormwater)
Latitude	40° 15' 44.34"	Longitude	-75° 48' 21.09"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Hay Creek (EV, MF)	Stream Code	1772
NHD Com ID	25963496	RMI	0.81
Drainage Area	22 sq. mi.	Yield (cfs/mi <sup>2</sup> )	
Q <sub>7-10</sub> Flow (cfs)	2.7	Q <sub>7-10</sub> Basis	StreamStats
Watershed No.	3-C	Chapter 93 Class.	EV, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	PATHOGENS		
Source(s) of Impairment	SOURCE UNKNOWN		
TMDL Status		Name	
Nearest Downstream Public Water Supply Intake	Pottstown Borough Water Authority		
PWS Waters	Schuylkill River	Municipality	West Pottsgrove Twp, Montgomery County
PWS RMI	57.0	Distance from Outfall (mi)	7

Drainage Area (sf): 50,200

% Impervious: 91%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:  
Roof drainage, parking, diesel UST fueling station

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:  
PPC Plan

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	003	Design Flow (MGD)	N/A (stormwater)
Latitude	40° 15' 45.25"	Longitude	-75° 48' 22.2"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Hay Creek (EV, MF)	Stream Code	1772
NHD Com ID	25963496	RMI	0.81
Drainage Area	22 sq. mi.	Yield (cfs/mi <sup>2</sup> )	
Q <sub>7-10</sub> Flow (cfs)	2.7	Q <sub>7-10</sub> Basis	StreamStats
Watershed No.	3-C	Chapter 93 Class.	EV, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	PATHOGENS		
Source(s) of Impairment	SOURCE UNKNOWN		
TMDL Status		Name	
Nearest Downstream Public Water Supply Intake	Pottstown Borough Water Authority		
PWS Waters	Schuylkill River	Municipality	West Pottsgrove Twp, Montgomery County
PWS RMI	57.0	Distance from Outfall (mi)	7

Drainage Area (sf): 7,200

% Impervious: 100%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:  
Rooftop drainage

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:  
PPC Plan

Outfall 003 is a no exposure outfall.

Compliance History	
<b>Summary of DMRs:</b>	Since this is an application for a new permit, DMR data is not available. A summary of application sampling results can be found in Table 1 below.  The facility was required to submit E. coli and Fecal Coliform impairment sampling results due to the pathogens impairment of the receiving water. The discharge is not expected to cause or contribute to the impairments.
<b>Summary of Inspections:</b>	Since this is an application for a new permit, inspections have not yet been conducted at the site.  The client currently has no open violations that should affect issuance of the final permit.

**Table 1.** Application Sampling Results (2025)

Pollutant	Outfall 001	Outfall 002
Oil and Grease (mg/L)	<5.1	<5.0
BOD5 (mg/L)	57.4	9.6
COD (mg/L)	236	154
TSS (mg/L)	580	306
TN (mg/L)	11.7	4.3
TP (mg/L)	0.12	<0.10
pH (S.U.)	6.96	6.68
Fecal Coliform (cfu/100mL)	7900	39
E. Coli (cfu/100mL)	>2420	1

#### Summary of Sampling Results:

Values highlighted in red in Table 1 exceeded typical PAG-03 benchmarks or permit limits. The applicable PAG-03 benchmarks include: 30 mg/L for Oil and Grease; 30 mg/L for BOD5; 120 mg/L for COD; 100 mg/L for TSS; 9.0 S.U. for pH. Benchmarks were exceeded for BOD5, COD, and TSS at Outfall 001. Benchmarks were exceeded for COD and TSS at Outfall 002.

Sampling results for Outfall 003 were not provided since it is a no exposure outfall.

Based on the facility's [SIC code of 2048](#), the applicable PAG-03 NPDES Permit for Discharges of Stormwater Associated with Industrial Activity (effective 3/24/2023) appendix is [Appendix I](#), which would include semiannual monitoring of TN, TP, pH, BOD5, TSS, COD, Nitrate + Nitrite-Nitrogen, and Oil and Grease.

**Proposed Effluent Limitations and Monitoring Requirements**

All parameters from PAG-03 Appendix I are included in this permit for Outfall 001 and Outfall 002. Sampling at Outfall 003 will not be required for this permit since Outfall 003 is a no exposure outfall. No additional parameters have been added.

**Table 2.** Proposed Monitoring Requirements for Outfall 001 and Outfall 002.

Parameter	Effluent Limitations				Monitoring Requirements <sup>(1),(2)</sup>	
	Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen (mg/L) <sup>(3)</sup>	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Chemical Oxygen Demand (COD) (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Suspended Solids (TSS) (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Biochemical Oxygen Demand (BOD5) (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Nitrate + Nitrite-Nitrogen (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab

**Footnotes**

- (1) In accordance with Part C V.C, the permittee shall conduct additional monitoring if specified by DEP in the letter authorizing permit coverage or other correspondence.
- (2) This is the minimum number of sampling events required. Permittees may optionally perform additional sampling.
- (3) Total Nitrogen is the sum of Total Kjeldahl-N (TKN) plus Nitrite-Nitrate as N (NO<sub>2</sub>+NO<sub>3</sub>-N), where TKN and NO<sub>2</sub>+NO<sub>3</sub>-N are measured in the same sample.

Benchmarks for pH of 9.0 S.U., TSS of 100 mg/L, COD of 120 mg/L, Oil and Grease of 30 mg/L, BOD5 of 30 mg/L are included, which is typical of the monitoring requirements for PAG-03 Appendices (effective 3/24/2023).

The BMPs from Appendix I are included.

The requirement to submit an Annual Report is included.

The requirement for routine inspections on a semiannual basis is included.

**Antidegradation (93.4):**

Since the applicant is proposing to discharge to HQ or EV waters and is seeking a permit for the first time, Module 1 (Anti Degradation Module) was included with the application.

The facility has been operating since 1928 with a new mill added in 2011. The site is already developed and fully operational. No new activities or site modifications are proposed.

The effluent limits for this discharge have been developed to ensure that existing instream water uses and the level of water quality necessary to protect the existing uses are maintained and protected. Best Management Practices will ensure that the existing instream uses are protected. No Exceptional Value Waters are impacted by this discharge.

The designated use of the receiving waters are as follows:

Hay Creek (EV, MF)

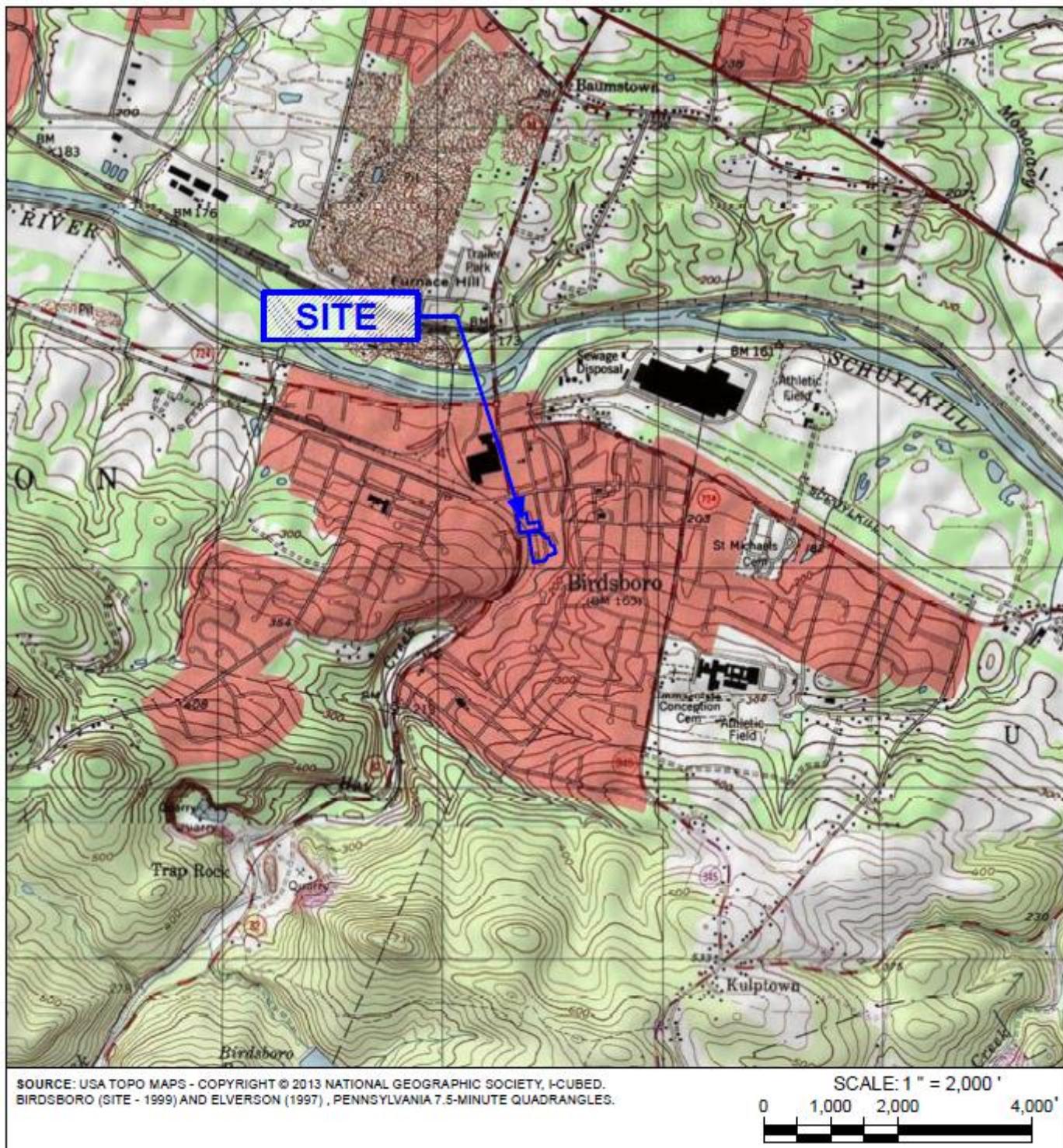
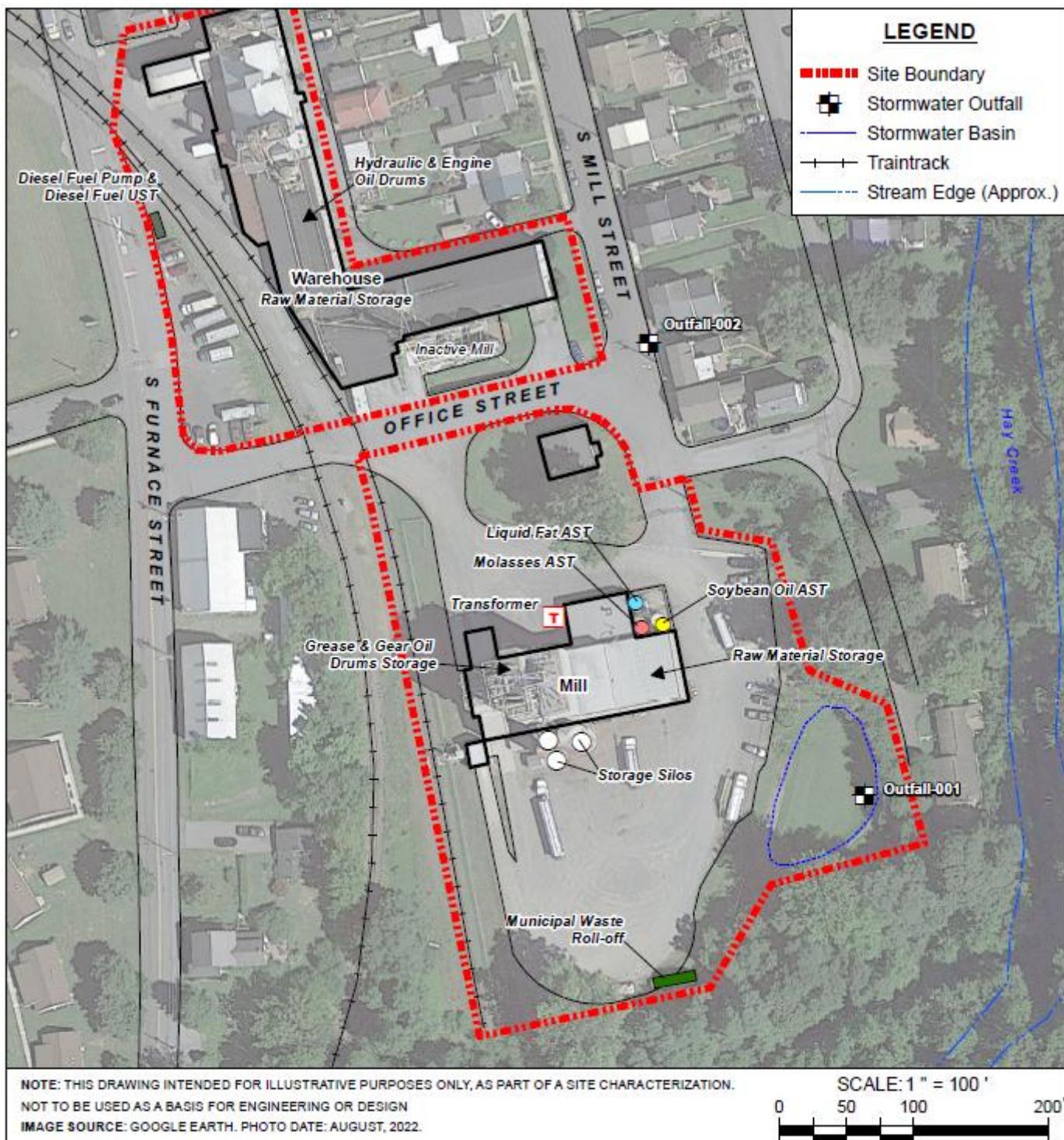


Figure 1. Site Location Map



**Figure 2 - Site Diagram**

**Brown's Feeds**  
127 South Furnace Street  
Birdsboro, Berks County, Pennsylvania

505 Penn St. Suite 400  
Reading, PA 19601  
Phone: 610-375-9301  
[www.libertyenviro.com](http://www.libertyenviro.com)

PROJECT NO.: 240499

REV: 0

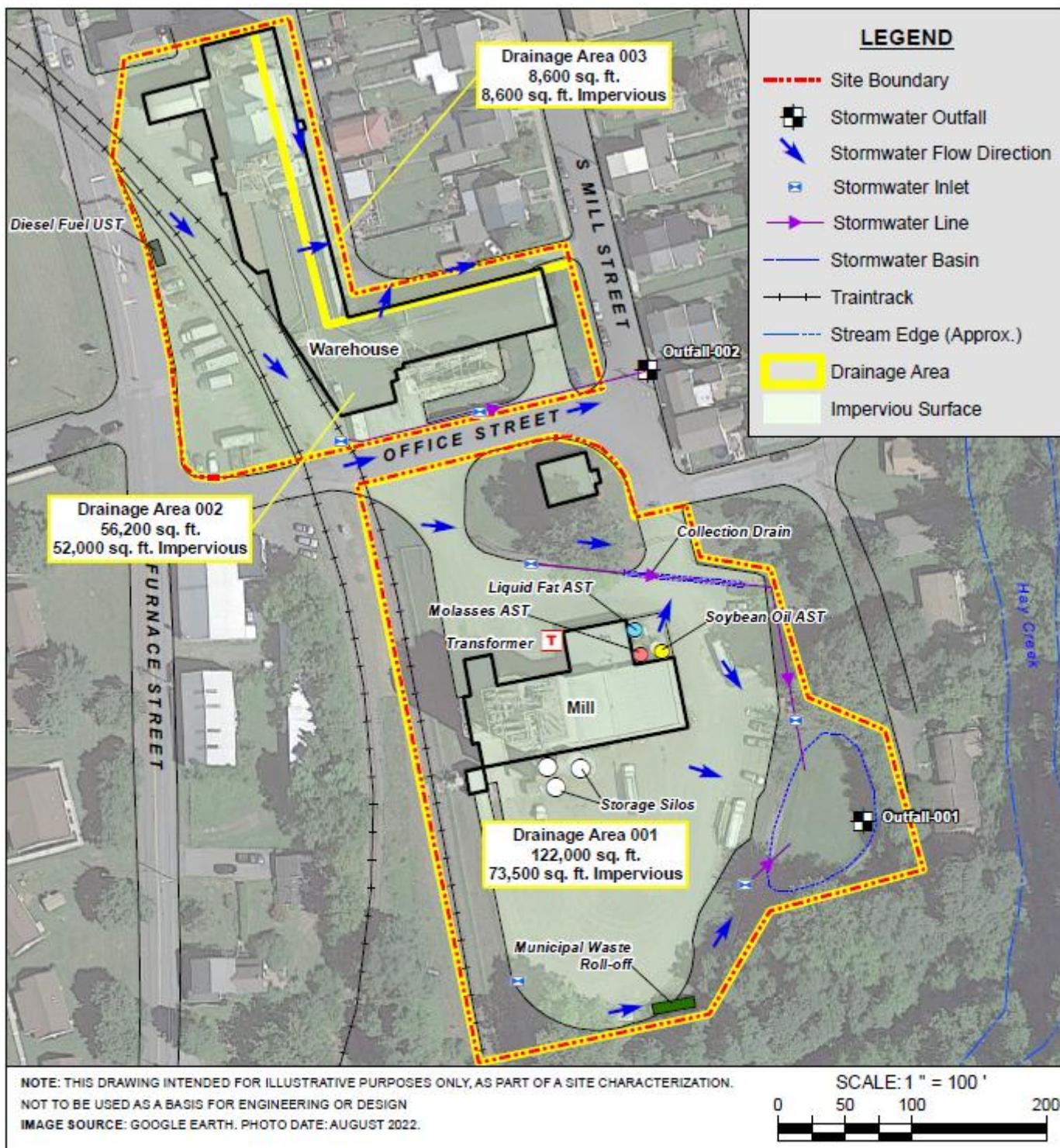
PREPARED BY: JRY

DATE: MARCH 25, 2025

SCALE: 1" = 100'

APPROVED BY: TAW

**Figure 2. Site Diagram**



**Figure 3 - Drainage Area Diagram**

**Brown's Feeds**

127 South Furnace Street  
Birdsboro, Berks County, Pennsylvania

505 Penn St. Suite 400  
Reading, PA 19601  
Phone: 610-375-9301  
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REV: 0

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DATE: MARCH 25, 2025

SCALE: 1" = 100'

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**Figure 3. Drainage Area Diagram**