

Application Type New
 Facility Type Storm Water
 Major / Minor Minor

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

Application No. PA0293148
 APS ID 1086435
 Authorization ID 1436057

Applicant and Facility Information

Applicant Name	<u>Russell Standard Corporation</u>	Facility Name	<u>Russell Standard Manufacturing Mercer</u>
Applicant Address	<u>285 Kappa Drive, Suite 300 Pittsburgh, PA 15238-2814</u>	Facility Address	<u>1210 Perry Highway Mercer, PA 16137</u>
Applicant Contact	<u>James Shay, EHS Director (james.shay@russellstandard.com)</u>	Facility Contact	<u>Bert Rogers, Plant Manager (bert.rogers@russellstandard.com)</u>
Applicant Phone	<u>(412) 926-9060</u>	Facility Phone	<u>(724) 748-3700</u>
Client ID	<u>39187</u>	Site ID	<u>457053</u>
SIC Code	<u>2951</u>	Municipality	<u>East Lackawannock Township</u>
SIC Description	<u>Manufacturing - Asphalt Paving Mixtures and Blocks</u>	County	<u>Mercer</u>
Date Application Received	<u>March 23, 2023</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>April 18, 2023</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>New NPDES Individual Industrial Waste Permit for an existing discharge of stormwater.</u>		

Summary of Review

Act 14 - Proof of Notification was submitted and received.

This facility is subject to ELGs under 40 CFR 443 - Paving and Roofing Materials (Tars and Asphalt).

A Part II Water Quality Management permit is not required at this time.

The applicant should be able to meet the limits of this permit, which will protect the uses of the receiving stream.

I. OTHER REQUIREMENTS:

- A. Right of way
- B. Solids handling
- C. NPDES Permit Supersedes WQM Permits
- D. Modification or Revocation for changes to BAT or BCT

SPECIAL CONDITIONS:

- II. Requirements Applicable to Stormwater Outfalls

There are 38 open violations in effects associated with the subject Client ID (39187) as of 10/4/2023 (see Attachment 1). *Applicant will be notified of open violations in Draft Permit Cover Letter and given an opportunity to address prior to final permit issuance. 10/10/2023 CWY*

Approve	Deny	Signatures	Date
X		Stephen A. McCauley Stephen A. McCauley, E.I.T. / Environmental Engineering Specialist	10/4/2023
X		Chad W. Yurismic Chad W. Yurismic, P.E. / Environmental Engineer Manager	10/10/2023

Discharge, Receiving Waters and Water Supply Information

Outfall No.	<u>001</u>	Design Flow (MGD)	<u>0.00</u>
Latitude	<u>41° 10' 24.91"</u>	Longitude	<u>-80° 14' 5.58"</u>
Quad Name	<u>-</u>	Quad Code	<u>-</u>
Wastewater Description: <u>Stormwater</u>			
Receiving Waters	<u>Unnamed Tributary to the Neshannock Creek (TSF)</u>	Stream Code	<u>N/A</u>
NHD Com ID	<u>130034640</u>	RMI	<u>N/A</u>
Drainage Area	<u>-</u>	Yield (cfs/mi ²)	<u>-</u>
Q ₇₋₁₀ Flow (cfs)	<u>-</u>	Q ₇₋₁₀ Basis	<u>-</u>
Elevation (ft)	<u>-</u>	Slope (ft/ft)	<u>-</u>
Watershed No.	<u>20-A</u>	Chapter 93 Class.	<u>TSF</u>
Existing Use	<u>-</u>	Existing Use Qualifier	<u>-</u>
Exceptions to Use	<u>-</u>	Exceptions to Criteria	<u>-</u>
Assessment Status	<u>Impaired*</u>		
Cause(s) of Impairment	<u>Siltation</u>		
Source(s) of Impairment	<u>Agriculture</u>		
TMDL Status	<u>-</u>	Name	<u>-</u>
Background/Ambient Data		Data Source	
pH (SU)	<u>-</u>		<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>Pennsylvania American Water Company - Ellwood City</u>		
PWS Waters	<u>Beaver River</u>	Flow at Intake (cfs)	<u>292.5</u>
PWS RMI	<u>13.0</u>	Distance from Outfall (mi)	<u>34.0</u>

* - The siltation impairment is attributed to agriculture, but Total Suspended Solids (TSS) from this site were evaluated and found to be well within reason. Since this discharge is stormwater only, and TSS is acceptable, the discharge is not expected to contribute to this impairment and will not require monitoring with this renewal.

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.

This discharge consists of stormwater runoff only. This site was previously permitted under NPDES Permit PAG038349. However, this facility does not qualify for the PAG-03 General Permit due to federal regulations for asphalt emulsion facilities.

This facility is subject to ELGs for pH, TSS, and Oil and Grease under 40 CFR 443 Subpart A for asphalt emulsions as seen in the following table:

Effluent characteristic	Effluent limitations (English units (lbs/1,000 gal of runoff))	
	Maximum for any 1 day	Average of daily values for 30 consecutive days shall not exceed
TSS	0.188	0.125
Oil and Grease	0.125	0.083
pH	(¹)	(¹)

¹ Within the range 6.0 to 9.0.

The ELGs for TSS and Oil and Grease are based on pounds per 1,000 gallons of runoff. These values were back-calculated to determine the equivalent concentration in mg/L for the permit limits.

$$\text{TSS: } \frac{0.188 \text{ lbs}}{1,000 \text{ gallons}} \times \frac{1 \text{ gallon}}{3.785 \text{ liters}} \times \frac{453692 \text{ mg}}{1 \text{ lb}} = 22.53 \text{ mg/L}$$

$$\text{TSS: } \frac{0.125 \text{ lbs}}{1,000 \text{ gallons}} \times \frac{1 \text{ gallon}}{3.785 \text{ liters}} \times \frac{453692 \text{ mg}}{1 \text{ lb}} = 14.98 \text{ mg/L}$$

$$\text{Oil and Grease: } \frac{0.125 \text{ lbs}}{1,000 \text{ gallons}} \times \frac{1 \text{ gallon}}{3.785 \text{ liters}} \times \frac{453692 \text{ mg}}{1 \text{ lb}} = 14.98 \text{ mg/L}$$

$$\text{Oil and Grease: } \frac{0.083 \text{ lbs}}{1,000 \text{ gallons}} \times \frac{1 \text{ gallon}}{3.785 \text{ liters}} \times \frac{453692 \text{ mg}}{1 \text{ lb}} = 9.94 \text{ mg/L}$$

Effluent characteristic	Effluent limitations (mg/L)	
	Maximum for any 1 day	Average of daily values for 30 consecutive days shall not exceed
TSS	22.5	14.9
Oil and Grease	14.9	9.9
pH	(¹)	(¹)

¹ Within the range 6.0 to 9.0.

Compliance History

DMR Data for Outfall 001 (from August 1, 2022 to July 31, 2023)

Parameter	JUL-23	JUN-23	MAY-23	APR-23	MAR-23	FEB-23	JAN-23	DEC-22	NOV-22	OCT-22	SEP-22	AUG-22
pH (S.U.) Daily Maximum		8.2						7.6				
TSS (mg/L) Daily Maximum		15						37				
Oil and Grease (mg/L) Daily Maximum		< 5.7						< 6.1				

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) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/6 months	Grab
TSS	XXX	XXX	XXX	14.9	22.5	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	9.9	14.9	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Compliance Sampling Location: at Outfall 001.

The limits for pH, TSS, and Oil and Grease are based on 40 CFR 443 Subpart A for asphalt emulsions. Monitoring for Total Nitrogen and Total Phosphorus is based on Appendix M of the PAG-03 General Permit, under the authority of Chapter 92a.61.

Attachment 1

**WATER MANAGEMENT SYSTEM
 OPEN VIOLATIONS BY CLIENT**



Client ID: 39187
 Client: All

Open Violations: 38

CLIENTID	CLIENT	PF ID	FACILITY	PF KIND	PF STATUS	INSP PROGRAM	PROGRAM SPECIFIC ID	INSP ID	VIOLATION ID	INSPECTION CATEGORY	VIOLATION DATE	VIOLATION CODE	VIOLATION	PF INSPECTOR	INSP REGION
39187	RUSSELL STD CORP	580225	RUSSELL STANDARD	Manufacturing/Industrial	Active	Storage Tanks	06-32869	3370176	957199	PF	03/30/2022	245.521(C)	Failure to protect tank from corrosion and deterioration		SCRO
39187	RUSSELL STD CORP	580225	RUSSELL STANDARD	Manufacturing/Industrial	Active	Storage Tanks	06-32869	3370176	957200	PF	03/30/2022	245.542	Failure to meet containment requirements		SCRO
39187	RUSSELL STD CORP	580225	RUSSELL STANDARD	Manufacturing/Industrial	Active	Storage Tanks	06-32869	3370196	957201	PF	03/30/2022	245.521(C)	Failure to protect tank from corrosion and deterioration		SCRO
39187	RUSSELL STD CORP	580225	RUSSELL STANDARD	Manufacturing/Industrial	Active	Storage Tanks	06-32869	3370196	957202	PF	03/30/2022	245.542	Failure to meet containment requirements		SCRO
39187	RUSSELL STD CORP	580225	RUSSELL STANDARD	Manufacturing/Industrial	Active	Storage Tanks	06-32866	3370207	957205	PF	03/30/2022	245.542	Failure to meet containment requirements		SCRO
39187	RUSSELL STD CORP	580225	RUSSELL STANDARD	Manufacturing/Industrial	Active	Storage Tanks	06-32866	3370207	957206	PF	03/30/2022	245.521(C)	Failure to protect tank from corrosion and deterioration		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3366688	958498	PF	03/23/2022	245.612(D)	Failure to meet containment requirements		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3366688	958499	PF	03/23/2022	245.612	Failure to meet performance and design standards		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3366688	958500	PF	03/23/2022	245.612	Failure to meet performance and design standards		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3366688	958501	PF	03/23/2022	245.612	Failure to meet performance and design standards		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3367036	958505	PF	03/23/2022	245.612(D)	Failure to meet performance and design standards		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3367036	958506	PF	03/23/2022	245.612	Failure to meet performance and design standards		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3367036	958507	PF	03/23/2022	245.612	Failure to meet performance and design standards		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3367036	958508	PF	03/23/2022	245.612	Failure to meet performance and design standards		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3367076	958510	PF	03/23/2022	245.612(D)	Failure to meet performance and design standards		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3367076	958511	PF	03/23/2022	245.612	Failure to meet performance and design standards		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3367076	958512	PF	03/23/2022	245.612	Failure to meet performance and design standards		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3367076	958513	PF	03/23/2022	245.612	Failure to meet performance and design standards		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3367086	958514	PF	03/23/2022	245.612(D)	Failure to meet performance and design standards		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3367086	958515	PF	03/23/2022	245.612	Failure to meet performance and design standards		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3367086	958516	PF	03/23/2022	245.612	Failure to meet performance and design standards		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3367086	958517	PF	03/23/2022	245.612	Failure to meet performance and design standards		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3384744	960331	PF	03/23/2022	245.513	Failure to meet preventative maintenance and housekeeping requirements		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3384744	960332	PF	03/23/2022	245.521(C)	Failure to protect tank from corrosion and deterioration		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3384744	960333	PF	03/23/2022	245.511	Operations and maintenance violations		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3384744	960334	PF	03/23/2022	245.541	Failure to meet overflow prevention requirements		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3384744	960335	PF	03/23/2022	245.521	Violation of performance standard for aboveground storage tank systems		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3384744	960336	PF	03/23/2022	245.542	Failure to meet containment requirements		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3384792	960338	PF	03/23/2022	245.511	Operations and maintenance violations		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3384792	960339	PF	03/23/2022	245.513	Failure to meet preventative maintenance and housekeeping requirements		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3384792	960340	PF	03/23/2022	245.521(C)	Failure to protect tank from corrosion and deterioration		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3384792	960341	PF	03/23/2022	245.521	Violation of performance standard for aboveground storage tank systems		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3384792	960343	PF	03/23/2022	245.542	Failure to meet containment requirements		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3384816	960349	PF	03/23/2022	245.513	Failure to meet preventative maintenance and housekeeping requirements		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3384816	960350	PF	03/23/2022	245.542	Failure to meet containment requirements		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3384816	960351	PF	03/23/2022	245.521(C)	Failure to protect tank from corrosion and deterioration		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3384816	960352	PF	03/23/2022	245.511	Operations and maintenance violations		SCRO
39187	RUSSELL STD CORP	583800	RUSSELL STANDARD	Unknown (for STDS Conv only)	Active	Storage Tanks	28-61048	3384816	960353	PF	03/23/2022	245.521	Violation of performance standard for aboveground storage tank systems		SCRO