pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southcentral Regional Office
CLEAN WATER PROGRAM

Application Type	**New**	Application No.	**PA0294012**
Facility Type	**Storm Water**	APS ID	**875395**
Major / Minor	**Minor**	Authorization ID	**1433963**

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

Applicant and Facility Information

Applicant Name	**Russell Standard Corporation**	Facility Name	**Russell Standard Reading**
Applicant Address	285 Kappa Drive Suite 300	Facility Address	3847 Pottsville Pike
	Pittsburgh, PA 15238-2814		Reading, PA 19605-1723
Applicant Contact	James Shay	Facility Contact	Joseph Barr
Applicant Phone	(412) 926-9060	Facility Phone	(610) 921-0271
Client ID	39187	Site ID	241426
SIC Code	2951	Municipality	Muhlenberg Township
SIC Description	Manufacturing - Asphalt Paving Mixtures And Blocks	County	Berks
Date Application Received	March 23, 2023	EPA Waived?	Yes
Date Application Accepted	June 1, 2023	If No, Reason	

Purpose of Application: NPDES discharge of stormwater associated with industrial activity.

Summary of Review

This is a new application for an NPDES individual permit for discharges of stormwater associated with industrial activity located in Muhlenberg Township, Berks County. See Figures 1 and 2 for Site Location Map and Site Plan.

The facility has an SIC code of 2951 (asphalt paving mixtures and blocks) and was previously covered under PAR703525 with a PAG-03 Appendix M. The facility manufactures and distributes hot mix asphalt, asphalt concrete, and asphalt emulsion.

Appendix M of the PAG-03 specifies that runoff from asphalt emulsion facilities is not covered under the PAG-03 and are subject to effluent limitation guidelines (ELGs) in 40 CFR Part 443. As a result, the facility was required to apply for an NPDES individual permit. PAR703525 will be replaced with PA0294012 upon issuance of this final permit.

An application was received 3/23/2023. The application was deemed complete on 6/1/2023. Technical deficiencies were addressed on 3/12/2024. The client currently has open violations that should be addressed prior to the issuance of the final permit.

The facility has one outfall that discharges to Laurel Run (WWF, MF): Outfall 001. From the facility's PPC: *Stormwater runoff within the production/handling area — comprising about one-fifth of the site — is in the form of sheet flow to Outfall 001. Stormwater from the site but outside the production/handling areas moves offsite via sheet flow. The facility has implemented a variety of structural and procedural Best Management Practices (BMPs) to minimize the possibility of contact of stormwater runoff with the materials and products at the facility during routine storage and transfers operations as well as in the event of defective equipment or failure. Any stormwater reaching the outfall is retained from leaving the overall site containment by a valve which is kept closed and locked at all times, unless an authorized discharge is occurring. Stormwater can be drained through the outfall valve only by manually opening the valve, only after facility personnel has inspected the stormwater to*

Approve	Deny	Signatures	Date
X		*Jacob S. Rakowsky* Jacob S. Rakowsky, E.I.T. / Project Manager	6/11/2024
X		*Scott M. Arwood* Scott M. Arwood, P.E. / Environmental Engineer Manager	6/11/2024

Summary of Review

ensure that there are no signs or indication of oil and hazardous substances. There are currently no treatment facilities at the site.

Per the application, the PPC Plan was last updated in December 2022.

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
Latitude	40º 23' 34"	Longitude	-75º 56' 06"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Laurel Run (WWF, MF)	Stream Code	1981
NHD Com ID	133228718	RMI	1.47
Drainage Area	7.77 sq. mi.	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	2.54	Q_{7-10} Basis	StreamStats
Watershed No.	3-C	Chapter 93 Class.	WWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	PATHOGENS, HABITAT ALTERATIONS, SILTATION		
Source(s) of Impairment	SOURCE UNKNOWN, URBAN RUNOFF/STORM SEWERS		
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	57.04	Distance from Outfall (mi)	~25

Drainage Area: 479,160 SF

% Impervious: 66.2%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:
From SPCC - Russell Standard is a manufacturer of asphalt products. The Reading Plant produces various grades of asphalt emulsions for the paving industry. The facility occupies approximately 15 acres and consists of several aboveground storage tanks, several truck loading/unloading areas, one process/milling building, one lab/warehouse building, drum storage area, two outside hot oil hearers and on inside industrial boiler to supply heat to the production and storage processes and buildings.
Raw and finished products stored at the facility include asphalt cement, asphalt emulsions, hydrochloric acid, diesel fuel, process oil, emulsifier soap solutions, and various other process chemicals. Raw materials are stored in tanks and pumped from these tanks via aboveground pipes to the process/mill building where the materials are blended into the finished products. These finished products are then pumped from the building to the tanks used specifically for finished product storage. The entire facility operation is contained in an earthen secondary containment. Localized containment has been constructed for some tanks.
All pole-mounted transformers are owned and serviced by the local utility. Electrical equipment within the facility are owned by Russell Standard and serviced by approved contractors. It has been confirmed that the transformers and electrical equipment owned by Russell Standard contain non-PCB oil.
The properties surrounding the facility are occupied by industrial type operations and include a railroad track, which runs along the eastern property line. However, the facility does not have rail loading or unloading capabilities. The Schuylkill River is located approximately one mile northwest of the facility.

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:
Appropriate containment, secondary containment, inspections, tests, records, trainings, discharge prevention procedures, security, good housekeeping. From SPCC - *The facility has implemented a variety of structural and procedural Best Management Practices (BMPs) to minimize the possibility of contact of stormwater runoff with the materials and products at the facility during routine storage and transfers operations as well as in the event of defective equipment or failure. Any stormwater reaching the outfall is retained from leaving the overall site containment by a valve which is kept closed and*

locked at all times, unless an authorized discharge is occurring. Stormwater can be drained through the outfall valve only by manually opening the valve, only after facility personnel has inspected the stormwater to ensure that there are no signs or indication of oil and hazardous substances. There are currently no treatment facilities at the site.

Compliance History	
Summary of DMRs:	A summary of application sampling results can be found in Table 1 below. The facility was required to submit E. Coli and Fecal Coliform sampling results due to the pathogen impairment of the receiving waters and TSS sampling results due to the siltation impairment of the receiving waters. The discharge is not expected to cause or contribute to the impairments.
Summary of Inspections:	The facility was last inspected on 11/13/2020. No violations were noted.

Other Comments: The client currently has open violations that should be addressed prior to issuing final permit.

Table 1. Application Sampling Results

Pollutant	Outfall 001
Oil and Grease (mg/L)	ND
BOD5 (mg/L)	ND
COD (mg/L)	ND
TSS (mg/L)	3.1
TN (mg/L)	1.84
TP (mg/L)	ND
pH (mg/L)	7.6
TDS (mg/L)	59
E. Coli (CFU/100ml)	4400
Fecal (CFU/100ml)	2900

Proposed Effluent Limitations and Monitoring Requirements

Runoff from asphalt emulsion facilities are subject to ELGs in 40 CFR Part 443. ELGs from 40 CFR Part 443.13 can be found in Table 2 below.

Table 2. 40 CFR Part 443.13 ELGs

Effluent Characteristic	Maximum for any 1 day	Average of daily values for 30 consecutive days shall not exceed-
TSS	0.023 kg/cu m	0.015 kg/cu m
Oil and Grease	0.015 kg/cu m	0.010 kg/cu m
pH	6.0 to 9.0 S.U.	6.0 to 9.0 S.U.

In addition to the limits above, Total Nitrogen and Total Phosphorus monitoring and reporting will be required for this permit, which is typical of PAG-03 monitoring requirements.

Table 3. Proposed Monitoring Requirements

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Daily Maximum	Average Monthly	Instant. Maximum		
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/month	Grab
TSS	XXX	XXX	XXX	23.0	15.0	XXX	1/month	Grab
Oil and Grease	XXX	XXX	XXX	15.0	10.0	XXX	1/month	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report Daily Max	XXX	1/month	Calculation
Total Phosphorus	XXX	XXX	XXX	XXX	Report Daily Max	XXX	1/month	Grab

The BMPs from PAG-03 Appendix M 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):

The applicant is not proposing a new or increased discharge to a High Quality (HQ) or Exceptional Value (EV) water, so Module 1 (Anti Degradation Module) was not attached to the application.

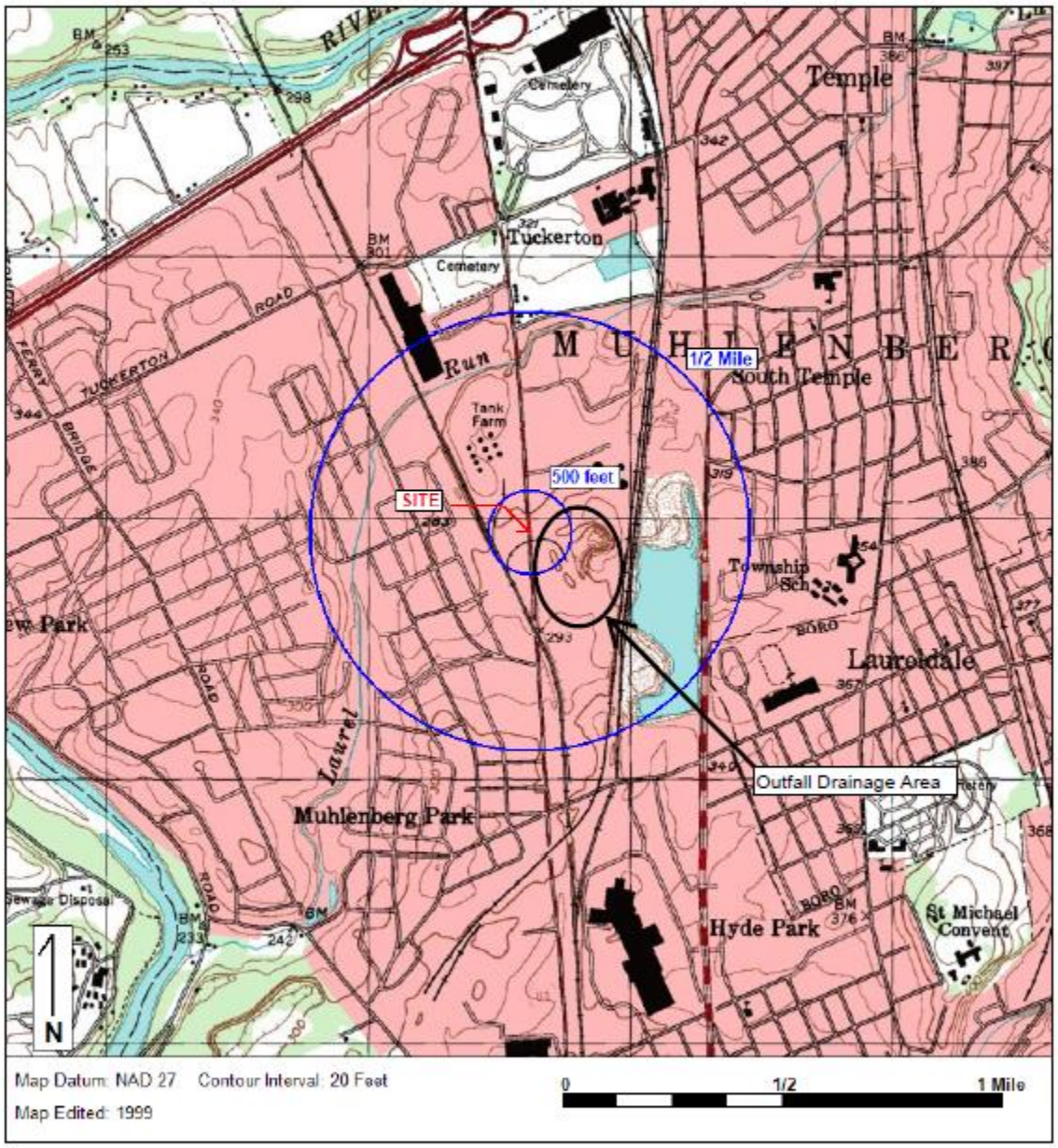
The effluent limits for this discharge have been developed to ensure that existing instream water uses and the level of water quality necessary to protect the existing uses are maintained and protected. Best Management Practices will ensure that the existing instream uses are protected. No Exceptional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

The designated use of the receiving waters are as follows:
Laurel Run (WWF, MF)

ATC Group Services LLC
1004 Corporate Lane
Export, PA 15632
Phone 888-483-7310 Fax 888-515-4869
www.atcgroupservices.com

Reading (Berks Co.)
3847 Pottsville Pike
Reading, PA 19605

Figure 1: SITE LOCUS



Base Map: U.S. Geological Survey; Quadrangle Location: Temple, PA

Lat/Lon: 40 23' 39.5" NORTH, 75 56' 7.4" WEST - UTM Coordinates: 18 420615.1 EAST / 4471942.1 NORTH

Generated By: Kevin Collins

Figure 1. Site Location

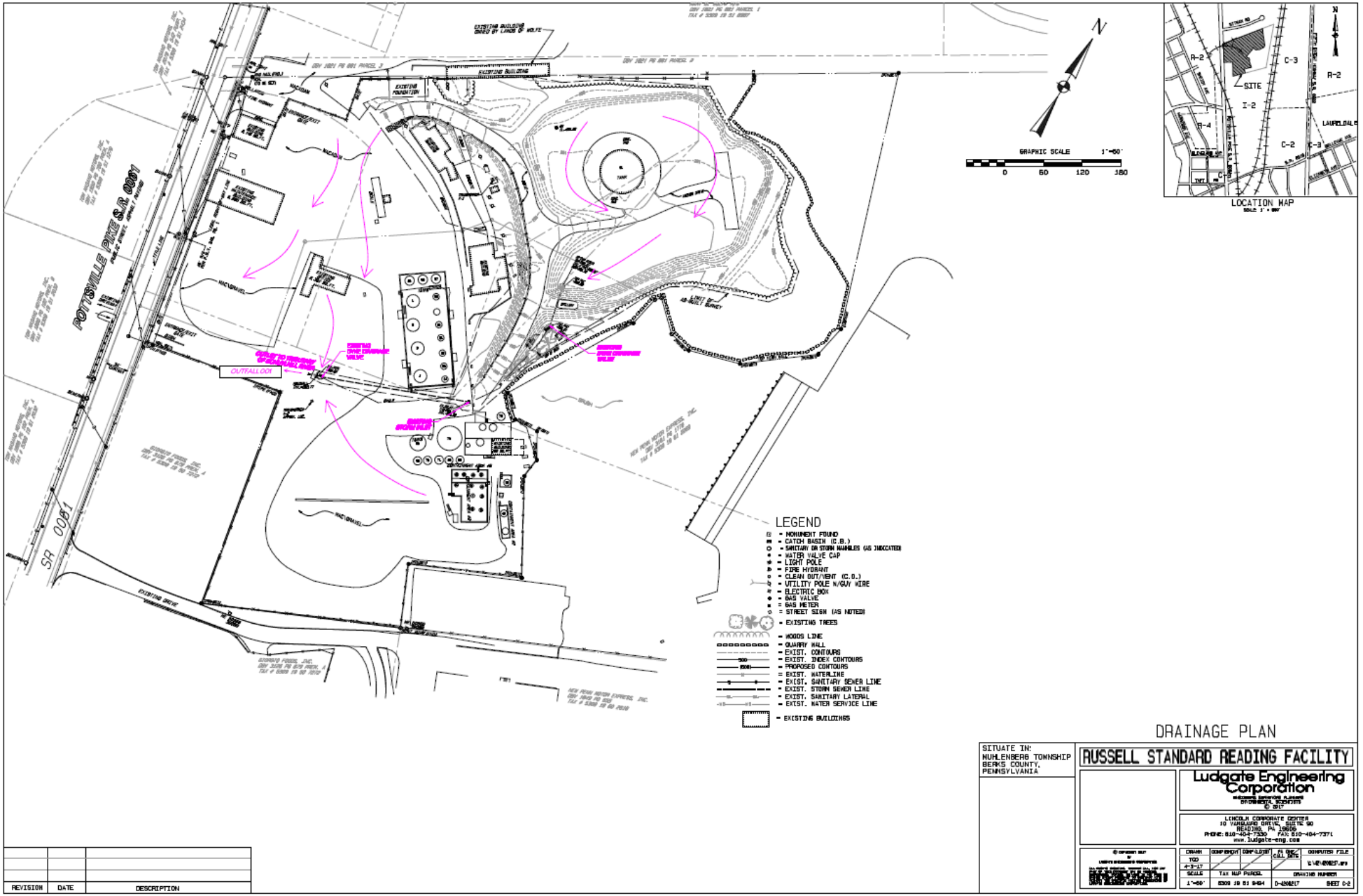


Figure 2. Site Plan