pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southcentral Regional Office
CLEAN WATER PROGRAM

Application Type	**New**	Application No.	**PA0294021**
Facility Type	**Storm Water**	APS ID	**1089843**
Major / Minor	**Minor**	Authorization ID	**1442226**

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

Applicant and Facility Information

Applicant Name	**Russell Standard Corporation**	Facility Name	**Russell Standard Chambersburg**
Applicant Address	285 Kappa Drive Suite 300	Facility Address	118 Siloam Road
	Pittsburgh, PA 15238-2814		Chambersburg, PA 17201-8901
Applicant Contact	James Shay	Facility Contact	Gavin Bear
Applicant Phone	(412) 926-9060	Facility Phone	(717) 263-0434
Client ID	39187	Site ID	575231
SIC Code	2951	Municipality	Greene Township
SIC Description	Manufacturing - Asphalt Paving Mixtures And Blocks	County	Franklin
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 Greene Township, Franklin County. See Figure 1, 2, and 2a for a Site Location Map and Site Plans.

The facility has an SIC code of 2951 (asphalt paving mixtures and blocks) and was previously covered under PAG033560 with a PAG-03 Appendix M. The facility manufactures and distributes hot mix asphalt 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. PAG033560 will be replaced with PA0294021 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 12/21/2023.

The facility has one outfall that discharges to Conococheague Creek (WWF, MF): Outfall 001. Outfall 001 is located at the western portion of the facility and collects runoff from the entire facility.

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.

Approve	Deny	Signatures	Date
X		*Jacob S. Rakowsky* Jacob S. Rakowsky, E.I.T. / Project Manager	1/18/2024
X		*Scott M. Arwood* Scott M. Arwood, P.E. / Environmental Engineer Manager	1/18/2024

Summary of Review

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	39º 57' 28.61"	Longitude	-77º 38' 47.13"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Conococheague Creek (WWF, MF)	Stream Code	59346
NHD Com ID	49469520	RMI	34.43
Drainage Area	95	Yield (cfs/mi^2)	22.4
Q_{7-10} Flow (cfs)		Q_{7-10} Basis	StreamStats
Watershed No.	13-C	Chapter 93 Class.	WWF, 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	
Nearest Downstream Public Water Supply Intake	Unknown – Maryland		
PWS Waters	Conococheague Creek, Franklin County to MD Border	Municipality	Antrim Township and Montgomery Township, Franklin County at MD border
PWS RMI	0.00 at MD border	Distance from Outfall (mi)	33 to MD border

Drainage Area: 222,000 SF

% Impervious: 95%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:
From SPCC - *The Chambersburg Facility is comprised of the production building (mill), loading and unloading areas, and product containment and storage areas. Containment Area 1 (CA-01) consists of 12 bulk ASTs, Unloading Area #1, and the Drum and Tote Storage Area (#28). CA-01 flows into Containment Area (CA-02). There are no storage containers in CA-02. CA-02 flows into Containment Area 3 (CA-03). CA-03 contains four above ground propane tanks, the boiler room, mill building, storage building, and three bulk ASTs containing batch water. Containment Area 4 contains 8 bulk ASTs. Containment Area 5 contains the loading rack, Unloading Area #2, Unloading Area #3, scale, scale house, storage building, and a large asphalt parking lot. Production piping routes raw materials stored within tanks located within containment areas to the production facility (mill) and back to finished product tanks; containment for the piping is provided by CA-01, CA-02, CA-03, CA-04, and CA-05.*

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:
SPCC pages 15-24 – appropriate containment, secondary containment, inspections, tests, records, trainings, discharge prevention procedures, security, good housekeeping.

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. The discharge is not expected to cause or contribute to the impairments.
Summary of Inspections:	An inspection was conducted on 9/11/2019. One violation was noted for unauthorized, unpermitted discharge of industrial wastes to waters of the Commonwealth. The violation was resolved 10/13/2019. The client currently has open violations with DEP that will need to be addressed prior to issuing the final permit.

Table 1. Application Sampling Results

Pollutant	Outfall 001
Oil and Grease (mg/L)	ND
BOD5 (mg/L)	5.6
COD (mg/L)	32
TSS (mg/L)	28
TN (mg/L)	1.1
TP (mg/L)	ND
pH (mg/L)	7.6
TDS (mg/L)	80
E. Coli (col/100ml)	>200.5
Fecal (col/100ml)	1540

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):

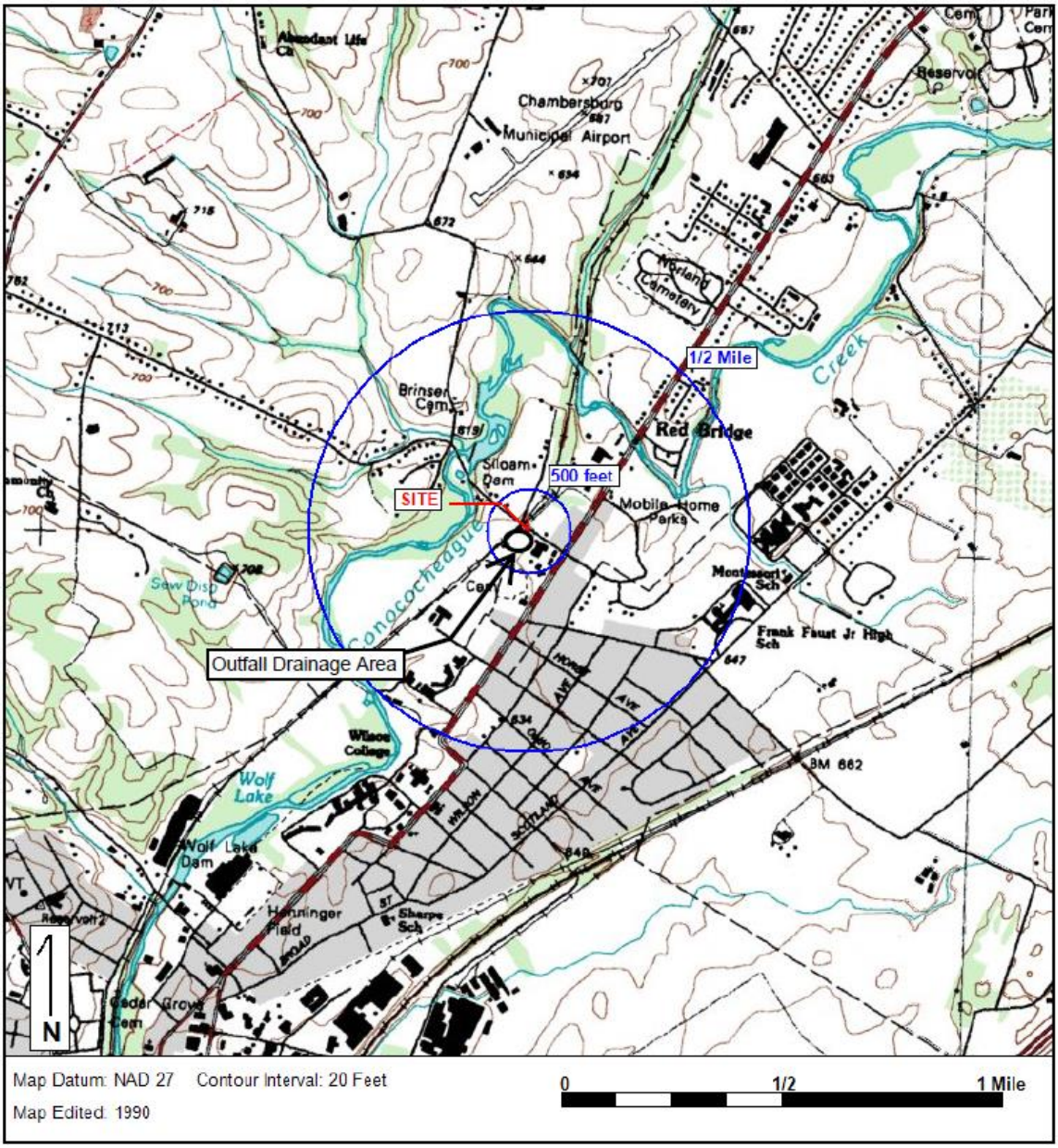
The applicant is not proposing a new or increased discharge to a High Quality (HQ) or Exceptional Value (EV) water, so Module 1 (Anti Degradation Module) was not attached to the application.

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:
Conococheague Creek (WWF, MF)

FACILITY ID : 32340
NAME : Russell Standard, Chambersburg Plant
LAT/LONG : 39.958861/-77.644997
ADDRESS: 118 Siloam Road, Chambersburg, PA 17201

Figure 1: SITE LOCUS



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

Lat/Lon: 39 57' 31.7448" NORTH, 77 38' 41.766" WEST - UTM Coordinates: 18 274079.4 EAST / 4426536.7 NORTH

ATLAS

Figure 1. Site Location

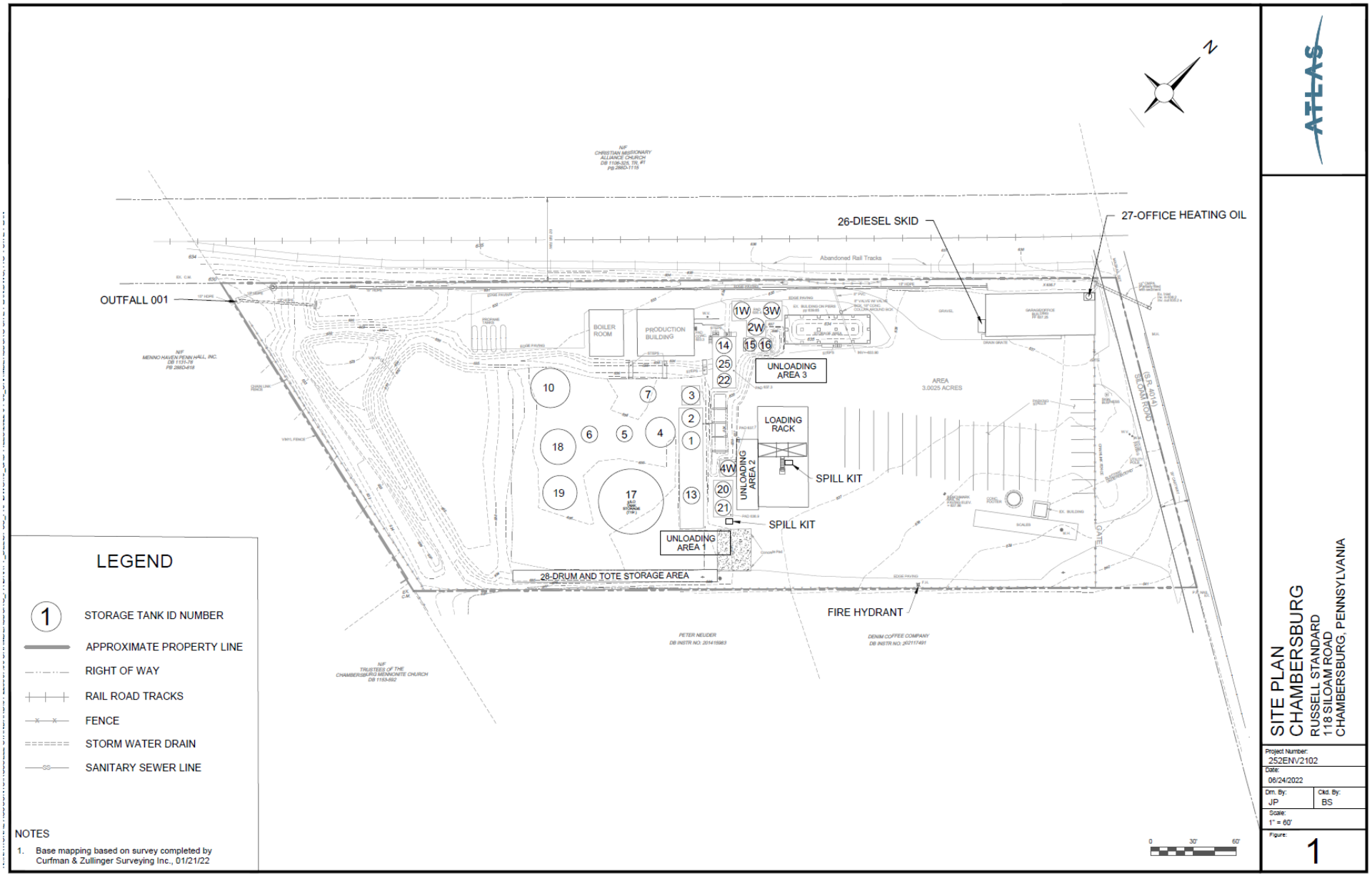


Figure 2. Site Plan

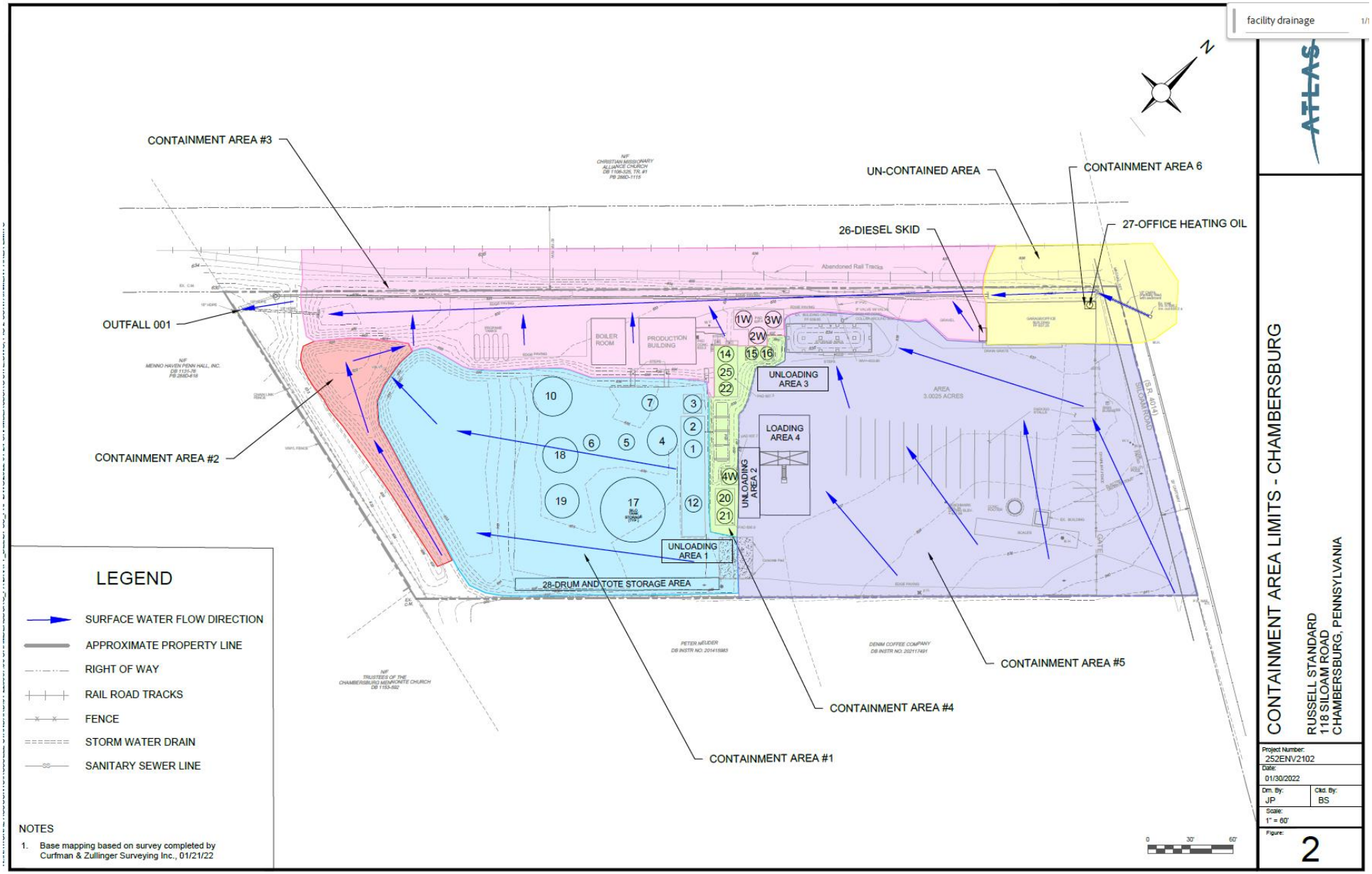


Figure 2a. Site Plan