pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southcentral Regional Office
CLEAN WATER PROGRAM

Application Type	**New**	Application No.	**PA0294225**
Facility Type	**Storm Water**	APS ID	**1097397**
Major / Minor	**Minor**	Authorization ID	**1455904**

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

Applicant and Facility Information

Applicant Name	**East Penn Avenue Robesonia LLC and Freeman Street Robesonia LLC**	Facility Name	**AWI Distribution & Transportation Centers**
Applicant Address	336 E Penn Avenue and 300 S Freeman Street Robesonia, PA 19551-8902	Facility Address	336 E Penn Avenue and 300 S Freeman Street Robesonia, PA 19551-8902
Applicant Contact	Walter Barron	Facility Contact	Walter Barron
Applicant Phone	(603) 903-4764	Facility Phone	(603) 903-4764
Client ID	317642	Site ID	810511
SIC Code	4222,4225,4231	Municipality	Heidelberg Township
SIC Description	Trans. & Utilities - General Warehousing And Storage,Trans. & Utilities - Refrigerated Warehousing And Storage,Trans. & Utilities - Trucking Terminal Facilites	County	Berks
Date Application Received	September 20, 2023	EPA Waived?	Yes
Date Application Accepted	October 5, 2023	If No, Reason	

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

Summary of Review

This is a new application for a NPDES individual permit for discharges of stormwater associated with industrial activity located in Heidelberg Township, Berks County. See Figures 1, 2, and 3 for Site Location and Layout Maps.

The facility's primary SIC code is 4222 (Refrigerated Warehousing & Storage) which requires an NPDES permit. The facility was previously covered under a PAG-03 General Permit under permit number PAG033526. Since the facility discharges to an HQ-CWF surface water, the facility was required to apply for coverage under a NPDES Individual Permit for Discharges of Stormwater Associated with Industrial Activities. If the facility qualified for a PAG-03, they would fall under Appendix L based on their SIC Code. PAG033526 will be replaced with PA0294225 upon issuance of the final permit.

The facility is made up of two contiguous properties - 336 East Penn Ave is a warehouse distribution center and 300 S Freeman St is a fleet maintenance garage and transportation center. The facility serves as a distribution warehouse for perishable and non-perishable products. The distribution warehouse operates using trucks for distribution, maintenance activities, and also stores batteries on site.

The facility has six outfalls: Outfalls 001, 002, 003, 004, 005, and 006.
Outfalls 001, 002, and 003 are located at 336 East Penn Ave and discharge to UNT to Spring Creek (HQ-CWF, MF). Outfall 001 is representative of Outfalls 002 and 003.
Outfalls 004, 005, and 006 are located at 300 South Freeman St and discharge to Furnace Creek (CWF, MF). Outfall 005 is representative of Outfalls 004 and 006.

Approve	Deny	Signatures	Date
X		*Jacob S. Rakowsky* Jacob S. Rakowsky, E.I.T. / Project Manager	3/28/2024
X		*Scott M. Arwood* Scott M. Arwood, P.E. / Environmental Engineer Manager	3/28/2024

Summary of Review

An application was received via OnBase 122620 on 9/20/2023. The application was deemed complete on 10/5/2023. Technical deficiency notices were issued on 11/16/2023 and 1/18/2024 via email. The deficiencies were addressed via email on 3/4/2024.

Per the application, the PPC Plan was last updated in August 2023.

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. There are no open violations for the client that would warrant withholding the issuance of this permit.

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	40º 20' 54.36"	Longitude	-76º 7' 31.44"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	UNT Spring Creek (HQ-CWF, MF)	Stream Code	1892
NHD Com ID	25995706	RMI	0.42
Drainage Area	1.16 sq. mi.	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	0.255	Q_{7-10} Basis	StreamStats
Watershed No.	3-C	Chapter 93 Class.	CWF, MF
Existing Use	HQ-CWF, MF	Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	NUTRIENTS, SILTATION		
Source(s) of Impairment	AGRICULTURE, AGRICULTURE		
TMDL Status		Name	
Nearest Downstream Public Water Supply Intake	Western Berks Water Authority		
PWS Waters	Tulpehocken Creek at Blue Marsh Dam	Municipality	Lower Heidelberg Twp, Berks County
PWS RMI	7.0	Distance from Outfall (mi)	~11

Drainage Area: 900,729 SF

% Impervious: 21%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:
From Application, Loading/Unloading Areas, Loading Docks, Compactor, Roll offs and Waste Containers, and General Facility Grounds

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:
From Application, Structural controls to reduce or remove pollutants in stormwater from reaching the receiving waters of the facility consist of catch basin, subsurface drainage, on-site detention basins, oil/water separators and vegetative cover. Good housekeeping, preventative maintenance, employee training and regular inspections are part of the non-structural measures used to reduce pollutants.

Outfall 001 is representative of Outfalls 002 and 003.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	005	Design Flow (MGD)	N/A (stormwater)
Latitude	40º 20' 41.76"	Longitude	-76º 7' 42.61"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Furnace Creek (CWF, MF)	Stream Code	1893
NHD Com ID	26003896	RMI	0.87
Drainage Area	0.11 sq. mi.	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	Outside StreamStats suggested range	Q_{7-10} Basis	StreamStats
Watershed No.	3-C	Chapter 93 Class.	CWF, 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	Western Berks Water Authority		
PWS Waters	Tulpehocken Creek at Blue Marsh Dam	Municipality	Lower Heidelberg Twp, Berks County
PWS RMI	7.0	Distance from Outfall (mi)	~11

Drainage Area: 765,132 SF

% Impervious: 44%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:
From Application, Loading/Unloading Areas, Loading Docks, Compactor, Roll offs and Waste Containers, Fueling Areas, and General Facility Grounds

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:
From Application, Structural controls to reduce or remove pollutants in stormwater from reaching the receiving waters of the facility consist of catch basin, subsurface drainage, on- site detention basins, oil/water separators and vegetative cover. Good housekeeping, preventative maintenance, employee training and regular inspections are part of the non-structural measures used to reduce pollutants.

Outfall 005 is representative of Outfalls 004 and 006.

Compliance History	
Summary of DMRs:	A summary of application sampling results can be found in Table 1 below. The facility was also required to submit E. Coli and Fecal Coliform sampling results at Outfall 001 due to the pathogen impairment of the receiving water. The discharge is not expected to cause or contribute to the impairment.
Summary of Inspections:	The facility was last inspected on 7/8/2022. No violations were noted.

Table 1. Application Sampling Results

Pollutant	Outfall 001*		Outfall 002		Outfall 003		Outfall 004		Outfall 005*		Outfall 006	
	Avg	Max	Avg	Max	Avg	Max	Avg	Max	Avg	Max	Avg	Max
Oil and Grease (mg/L)	<5.69	<6.25	<5.80	<6.25	10.05	24.0	<5.68	<6.25	<5.61	<6.25	<5.49	<6.25
BOD5 (mg/L)	<3.33	<3.33	<3.33	<3.33	3.81	3.81	<3.33	<3.33	<3.33	<3.33	<3.33	<3.33
COD (mg/L)	<20.0	<20.0	<20.0	<20.0	<20.0	<20.0	<20.0	<20.0	<20.0	<20.0	<20.0	<20.0
TSS (mg/L)	6.23	8.43	6.25	13.2	5.87	12.2	4.4	5.2	3.80	5.0	4.9	8.3
TN (mg/L)	0.804	0.804	0.778	0.778	0.609	0.609	0.564	0.564	0.709	0.709	0.876	0.876
TP (mg/L)	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	<0.10	0.176	0.176	0.209	0.209
pH (S.U.)	7.9	7.9	-	-	-	-	-	-	7.8	7.8	-	-

*Outfall 001 is representative of Outfalls 002 and 003. Outfall 005 is representative of Outfalls 006 and 007. Sampling will only be required at Outfalls 001 and 005.

Proposed Effluent Limitations and Monitoring Requirements

Based on the facility's primary **SIC Code of 4222**, the **applicable PAG-03** NPDES Permit for Discharges of Stormwater Associated with Industrial Activity (effective 3/24/2023) appendix is **Appendix L**, which would include the following monitoring requirements:

Table 2. PAG-03, Appendix L Requirements

Parameter	Monitoring Requirements [1],[2]		Benchmark Values
	Minimum Measurement Frequency	Sample Type	
Total Nitrogen (mg/L) [3]	1 / 6 months	Calculation	XXX
Total Phosphorus (mg/L)	1 / 6 months	Grab	XXX
Total Suspended Solids (TSS) (mg/L)	1 / 6 months	Grab	100
Oil and Grease (mg/L)	1 / 6 months	Grab	30

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 (NO2+NO3-N), where TKN and NO2+NO3-N are measured in the same sample.

Table 3. Proposed Monitoring Requirements

Parameter	Effluent Limitations				Monitoring Requirements	
	Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Total Nitrogen (mg/L)	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Suspended Solids (TSS) (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab

All required parameters from PAG-03 Appendix L are included in this permit.
Benchmarks for TSS of 100 mg/L and Oil and Grease 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 L 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 discharge to a High Quality (HQ) or Exceptional Value (EV) water, so Module 1 (Anti Degradation Module) was not required to be submitted with the application. The applicant voluntarily submitted Module 1. The existing discharges commenced in 1963 and were previously covered under PAG033526.

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:
UNT to Spring Creek (CWF, MF)
Furnace Creek (CWF, MF)

The existing use of the receiving waters are as follows:
UNT to Spring Creek (HQ-CWF, MF)

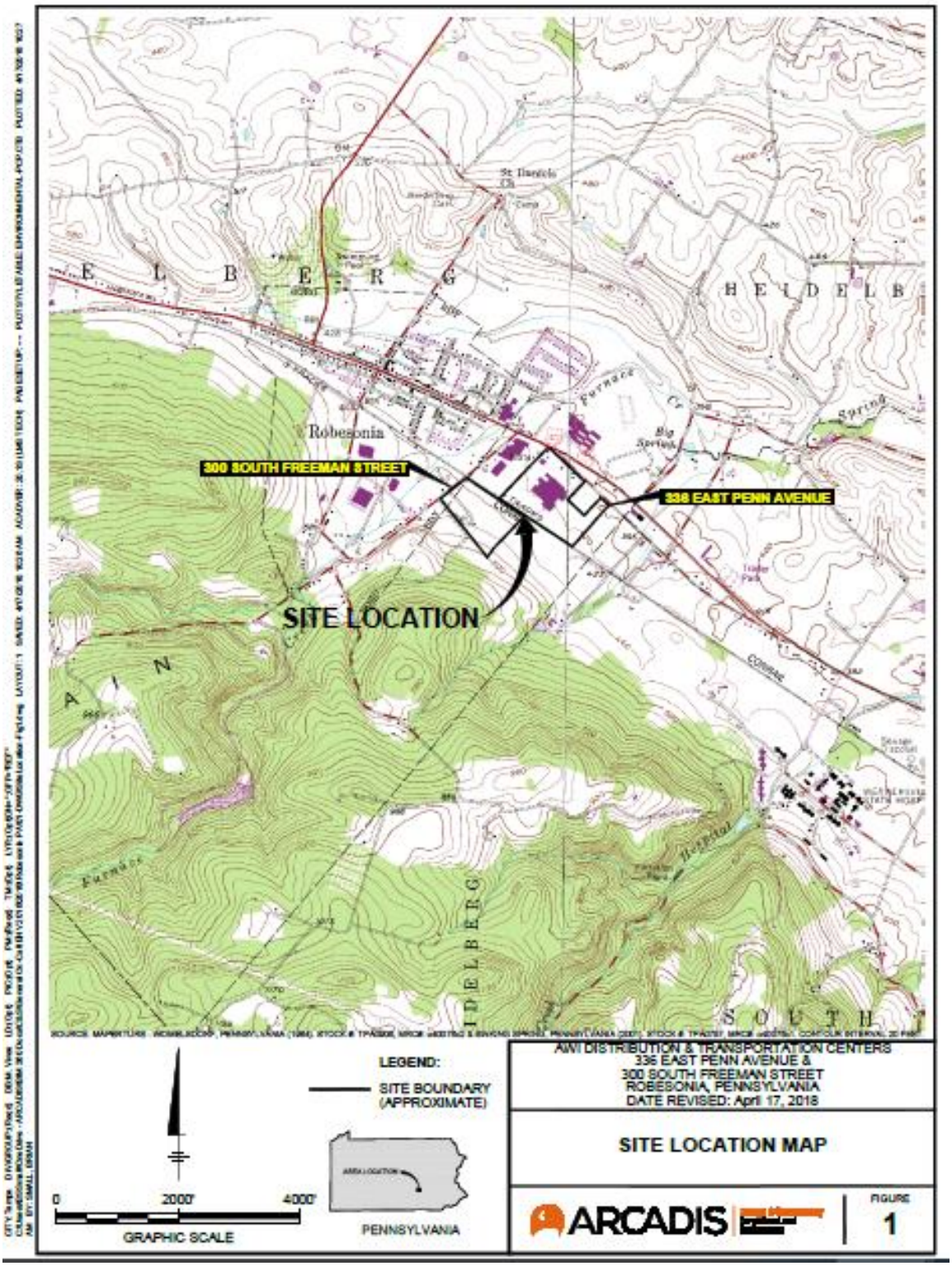

Figure 1. Site Location Map

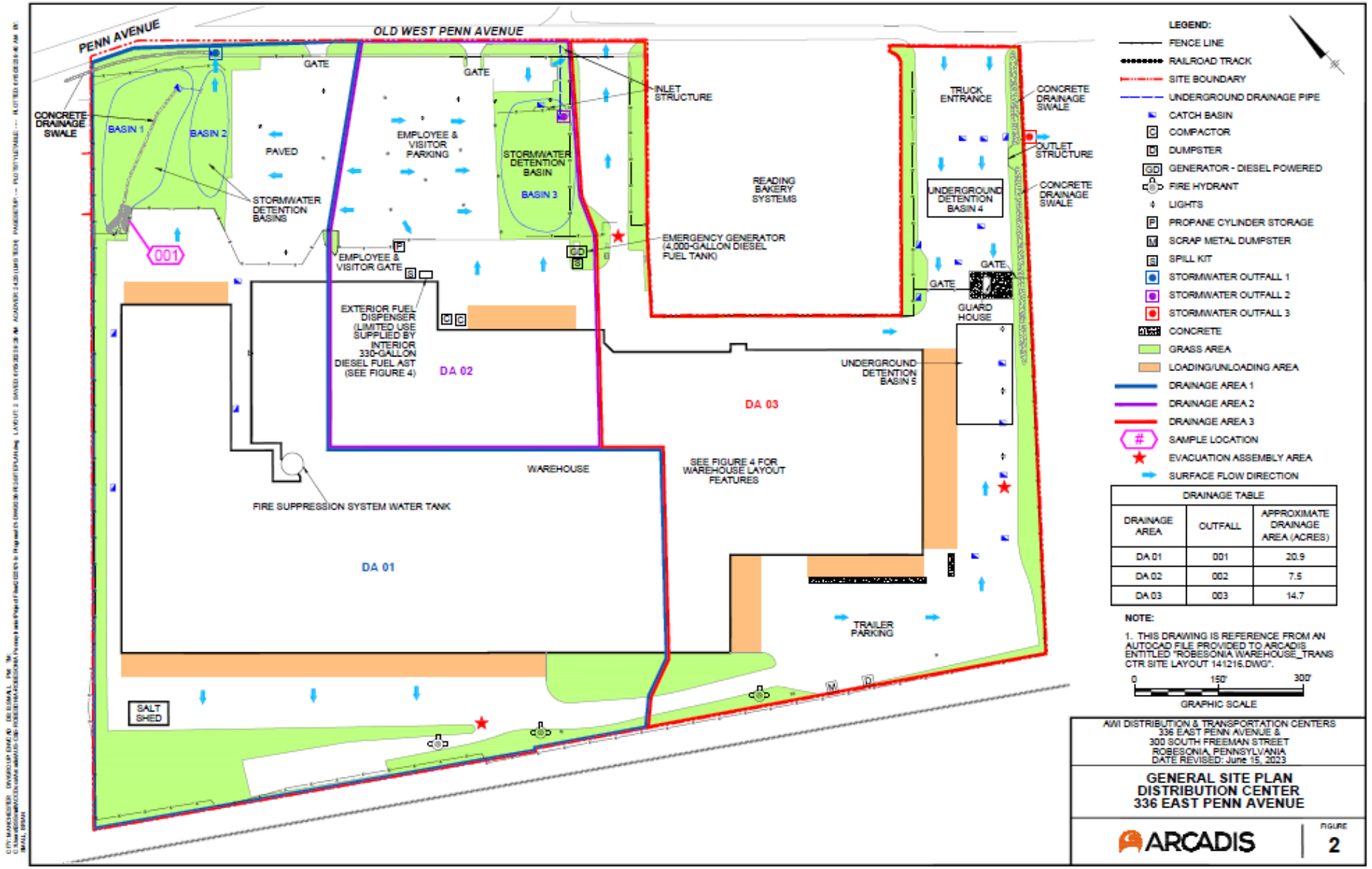

Figure 2. 336 East Penn Ave Site Layout

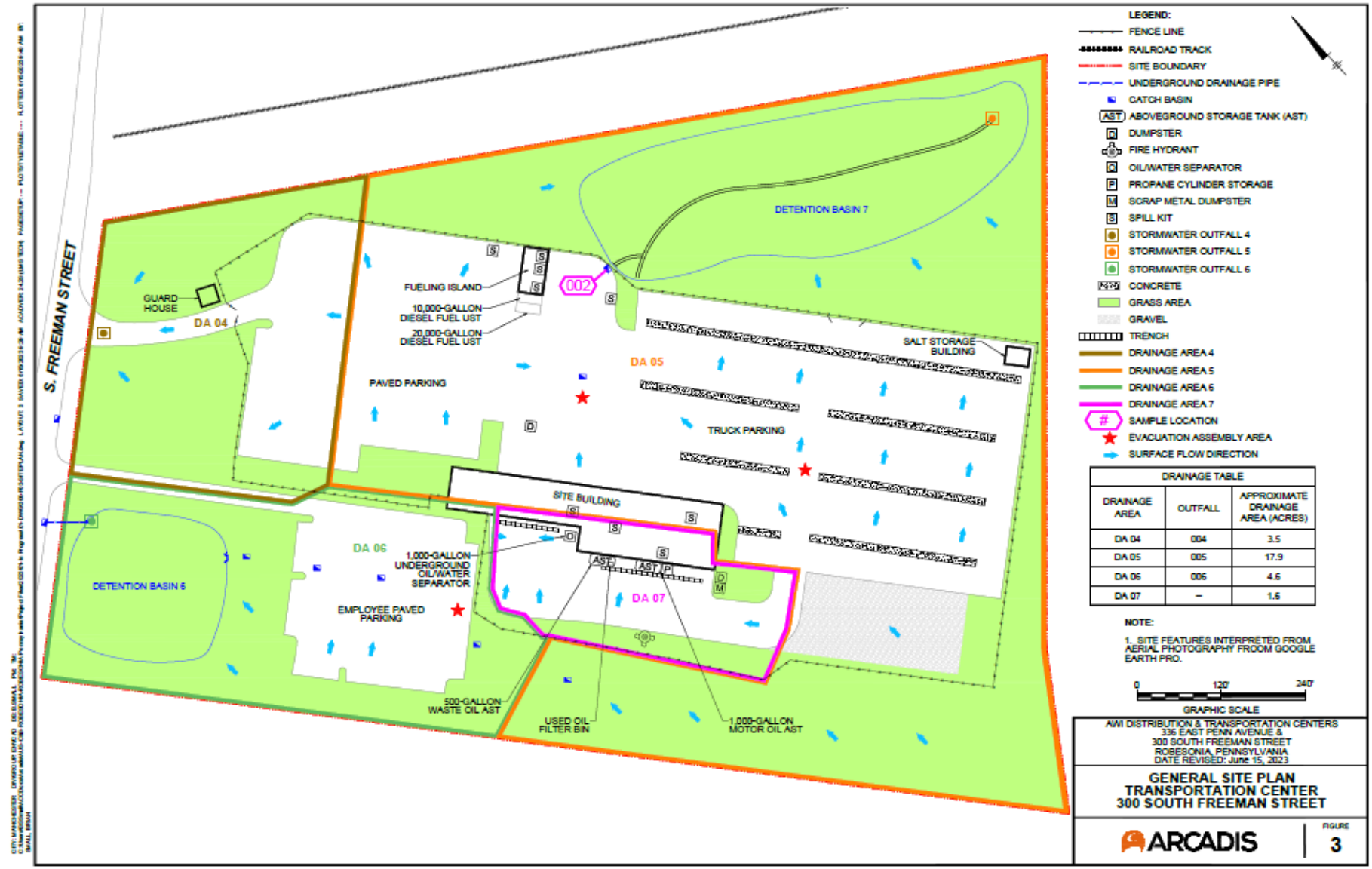

Figure 3. 330 South Freeman St Site Layout