pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southcentral Regional Office
CLEAN WATER PROGRAM

Application Type	**New**	Application No.	**PA0294233**
Facility Type	**Storm Water**	APS ID	**1097403**
Major / Minor	**Minor**	Authorization ID	**1455911**

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

Applicant and Facility Information

Applicant Name	**Brenntag Northeast LLC**	Facility Name	**Brenntag Northeast Snyder Rd Facility**
Applicant Address	5083 Pottsville Pike	Facility Address	619 Snyder Road
	Reading, PA 19605-9724		Reading, PA 19605-9288
Applicant Contact	Rich Stanley	Facility Contact	Rich Stanley
Applicant Phone	(610) 916-9369	Facility Phone	(610) 916-9369
Client ID	69472	Site ID	254298
SIC Code	5169	Municipality	Ontelaunee Township
SIC Description	Wholesale Trade - Chemicals And Allied Products, Nec	County	Berks
Date Application Received	September 13, 2023	EPA Waived?	Yes
Date Application Accepted	January 12, 2024	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 Ontelaunee Township, Berks County. See Figure 1 and Figure 2 for a Site Location Map and Site Plan.

The facility was previously covered under a PAG-03, PAR233525. The permittee submitted a renewal NOI for their PAG-03 on 8/22/2023. The pending PAG-03 renewal was identified as PAG034041. It was discovered during the review of PAG034031 that the facility discharges to an HQ-CWF surface water. Since the facility discharges to an HQ-CWF surface water, the facility is ineligible for a PAG-03. As a result, DEP required the permittee to apply for an NPDES Individual Permit for Discharges of Stormwater Associated with Industrial Activities.

An application was received via OnBase 121728 on 9/13/2023. DEP issued a deficiency notice on 10/30/2023. The deficiencies were addressed on 1/10/2024 via email and the application was deemed complete on 1/12/2024.

Facility Description, from Application: *Chemical distribution, logistics, and custom chemical services.* The facility's SIC code is 5169 (chemicals and allied products), which is not directly referenced in 40 CFR § 122.26(b)(14).

SIC Code 2899 (Chemicals and Chemical Preparations, Not Elsewhere Classified) is directly referenced in 40 CFR 122.26 (b)(14). Facilities that fall under SIC Code 2899 and are eligible for the PAG-03 would be responsible for following the monitoring requirements and best management practices found in Appendix F of the PAG-03. While this facility packages and distributes chemicals and allied products, the assumption can be made that the potential pollutants would be comparable to a facility that manufactures chemicals and allied products. Therefore, Appendix F of the PAG-03 is most applicable to this facility.

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

The facility discharges to Willow Creek (HQ-CWF, MF) through two outfalls: Outfall 001 and Outfall 002. Outfall 001 is located at the southeastern side of the facility as the discharge to the lower basin. Outfall 002 is located at the western side of the facility at the discharge of a catch basin. Outfall 001 is representative of Outfall 002.

Per the application, the PPC Plan was last updated in February 2020.

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
Latitude	40º 25' 36"	Longitude	-75º 56' 3"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Willow Creek (HQ-CWF, MF)	Stream Code	1986
NHD Com ID	26000220	RMI	0.38
Drainage Area	21.6	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	3.5	Q_{7-10} Basis	StreamStats
Watershed No.	3-B	Chapter 93 Class.	HQ-CWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	FLOW REGIME MODIFICATION, NUTRIENTS, PATHOGENS		
Source(s) of Impairment	INDUSTRIAL POINT SOURCE DISCHARGE, INDUSTRIAL POINT SOURCE DISCHARGE, SOURCE UNKNOWN		
TMDL Status		Name	
Nearest Downstream Public Water Supply Intake	Pottstown Borough Water Authority		
PWS Waters	Schuylkill River	Flow at Intake (cfs)	West Pottsgrove Twp, Montgomery County
PWS RMI	57.04	Distance from Outfall (mi)	31

Drainage Area: 123,310 SF

% Impervious: 100%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:
From Application: *Tank farm and tank farm loading/unloading areas via tanker truck, blending building, upper warehouse building roof drains, stormwater from the northern building roof drains of the lower warehouse, empty tote/drum staging, municipal trash dumpster*

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:
From Application: *Treatment via the upper containment basin and the lower infiltration basin.*

Outfall 001 is representative of Outfall 002. Sampling will only be required at Outfall 001.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	002	Design Flow (MGD)	N/A
Latitude	40º 25' 37"	Longitude	-75º 56' 7"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Willow Creek (HQ-CWF, MF)	Stream Code	1986
NHD Com ID	26000220	RMI	0.38
Drainage Area	21.6	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	3.5	Q_{7-10} Basis	StreamStats
Watershed No.	3-B	Chapter 93 Class.	HQ-CWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	FLOW REGIME MODIFICATION, NUTRIENTS, PATHOGENS		
Source(s) of Impairment	INDUSTRIAL POINT SOURCE DISCHARGE, INDUSTRIAL POINT SOURCE DISCHARGE, SOURCE UNKNOWN		
TMDL Status		Name	
Nearest Downstream Public Water Supply Intake	Pottstown Borough Water Authority		
PWS Waters	Schuylkill River	Flow at Intake (cfs)	West Pottsgrove Twp, Montgomery County
PWS RMI	57.04	Distance from Outfall (mi)	31

Drainage Area: 14,582 SF

% Impervious: 100%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:
From Application: *Loading dock area and stormwater from the southern building roof drains of the lower warehouse.*

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:
From Application: *Treatment via the catch basin located to the south of the loading dock area*

Compliance History	
Summary of DMRs:	A summary of available eDMR data from 2022 through 2023 can be found in Table 1 below. A summary of Application sampling results can be found in Table 2 below. The facility was required to submit E. Coli and Fecal Coliform sampling results due to the pathogen impairment of the receiving waters and TN and TP sampling results due to the nutrient impairment of the receiving waters. The discharge is not expected to cause or contribute to the impairments.
Summary of Inspections:	An incident response inspection was conducted on 8/16/2018. Two violations were noted. The violations were resolved on 9/24/2018. A compliance evaluation inspection was conducted on 2/11/2020. No violations were noted. An administrative/file review was conducted on 5/11/2023. One violation was noted. The violation was resolved on 8/22/2023. There are currently no open violations for the client that should affect issuance of the final permit.

Table 1. 2022-2023 eDMR Data

Outfall 001*	1st Half 2022	2nd Half 2022	1st Half 2023	2nd Half 2023		PADEP References		
						MCL (mg/L)	No Exposure Conditions (mg/L)	PAG03 Benchmark (mg/L)
COD	<25	<25	No Discharge	Not Reported		None	</= 30	120
pH	8.31	7.71	No Discharge	Not Reported		6.5 to 8.5 S.U.	6.0 to 9.0 S.U.	6.0 to 9.0 S.U.
Nitrate-Nitrite as N	<2.31	<2.03	No Discharge	Not Reported		None	None	3.0
Total Phosphorus	0.13	0.25	No Discharge	Not Reported		None	</= 1.0	None
Total Iron	0.07	0.48	No Discharge	Not Reported		0.3	</= 7.0	None
Total Lead	<0.01	<0.01	No Discharge	Not Reported		0.005**	None	None
Total Zinc	<0.005	0.014	No Discharge	Not Reported		5.0	None	None
Total Aluminum	<0.02	0.3	No Discharge	Not Reported		0.2	None	None

*Outfall 001 is representative of Outfall 002.
** MCL is applicable only to bottled, vended, retail, and bulk water hauling systems.

Table 2. 2023 Revised Application Sampling Results

	Outfall 001*		Outfall 002			PADEP References		
Pollutant (mg/L)	**Average**	**Max**	**Average**	**Max**	**MCL (mg/L)**	**No Exposure Conditions (mg/L)**	**PAG03 Benchmark (mg/L)**
Oil and Grease	<5	<5	<5	<5	None	</= 5.0	30
BOD5	**40.8**	**40.8**	**41.5**	**41.5**	None	</= 10	**30**
COD	33.17	58	36.6	61	None	</= 30	120
TSS	20.4	59	10.8	24	None	</= 30	100
TN	<1.68	<1.68	<1.67	<1.67	None	</= 2.0	None
TP	0.24	0.61	0.278	0.6	None	</= 1.0	None
pH (S.U.)	8.15	8.87	8.11	8.74	6.5 to 8.5 S.U.	6.0 to 9.0 S.U.	6.0 to 9.0 S.U.
Nitrate as N	1.87	3.22	1.56	3.22	10	None	None
Nitrite as N	0.114	0.17	0.112	0.16	1.0	None	None
Nitrate-Nitrite as N	<1.84	<3.32	<1.99	<3.32	None	None	3.0
Total Aluminum	0.132	0.2	0.254	0.66	0.2	None	None
Total Iron	0.23	0.48	0.376	0.9	0.3	</= 7.0	None
Total Lead	<0.01	<0.01	<0.01	<0.01	0.005**	None	None
Total Zinc	0.027	0.05	0.032	0.068	5.0	None	None
E. Coli (mpn/100ml)	11	11	3	3	Negative check sample	None	None
Fecal Coliform (coliforms/100ml)	310	310	82	82	Negative check sample	None	None

*Outfall 001 is representative of Outfall 002.
** MCL is applicable only to bottled, vended, retail, and bulk water hauling systems.

Summary of eDMRs and Application Sampling: Available eDMR data from 2022 through 2023 showed that concentrations did not exceed PAG03 benchmarks. Application sampling results showed that BOD5 concentrations exceeded the typical PAG03 benchmark of 30 mg/L.

Based on the description of the facility's activities, the **applicable PAG-03** NPDES Permit for Discharges of Stormwater Associated with Industrial Activity appendix is **Appendix F**, which would include the following monitoring requirements:

Table 3. PAG-03, Appendix F 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
pH (S.U.)	1 / 6 months	Grab	9.0
Chemical Oxygen Demand (COD) (mg/L)	1 / 6 months	Grab	120
Total Suspended Solids (TSS) (mg/L)	1 / 6 months	Grab	100
Nitrate + Nitrite-Nitrogen (mg/L)	1 / 6 months	Grab	3.0
Total Lead (mg/L)	1 / 6 months	Grab	XXX
Total Zinc (mg/L)	1 / 6 months	Grab	XXX
Total Iron (mg/L)	1 / 6 months	Grab	XXX
Total Aluminum (mg/L)	1 / 6 months	Grab	XXX

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.

Proposed Effluent Limitations and Monitoring Requirements

In addition to the Appendix F parameters and benchmarks, BOD5 monitoring and reporting will be required for this permit since BOD5 concentrations exceeded the typical PAG-03 benchmark of 30 mg/L in the Application sampling results. A benchmark of 30 mg/L will be included for BOD5. Sampling will only be required at representative Outfall 001.

Table 4. 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
pH (S.U.)	XXX	XXX	Report	XXX	1/6 months	Grab
COD (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
TSS (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Nitrate + Nitrite-Nitrogen (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Lead (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Zinc (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Aluminum (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
5-Day Biochemical Oxygen Demand (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab

All required parameters from PAG-03 Appendix F are included in this permit. Additionally, BOD5 is included.
Benchmarks for TSS of 100 mg/L, pH of 9.0 S.U., COD of 120 mg/L, Nitrate + Nitrite-Nitrogen of 3.0 mg/L, and BOD5 of 30 mg/L are included, which is typical of the monitoring requirements for PAG-03 Appendices.
The BMPs from Appendix F 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 included with 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:
Willow Creek (HQ-CWF, MF)

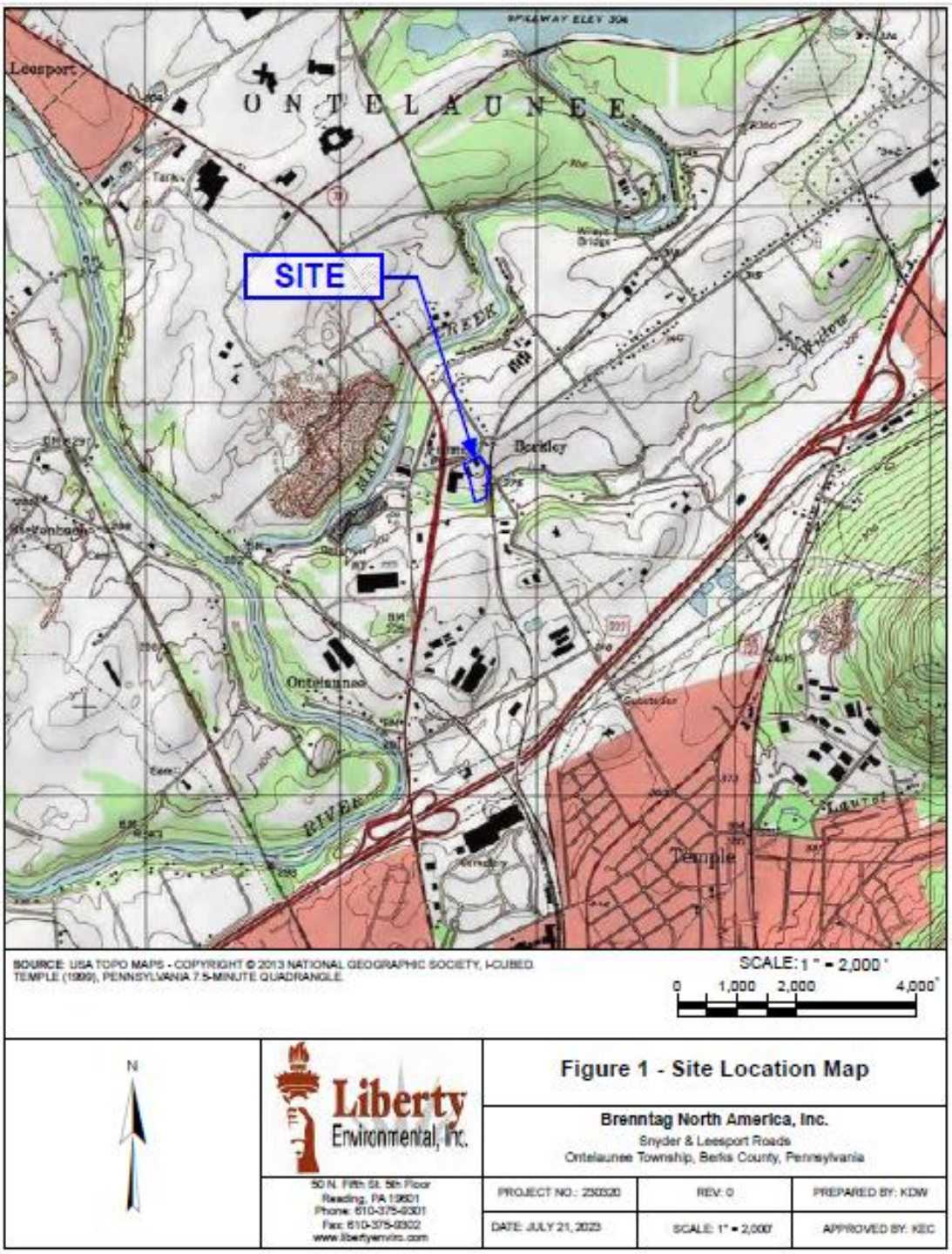

Figure 1. Site Location Map

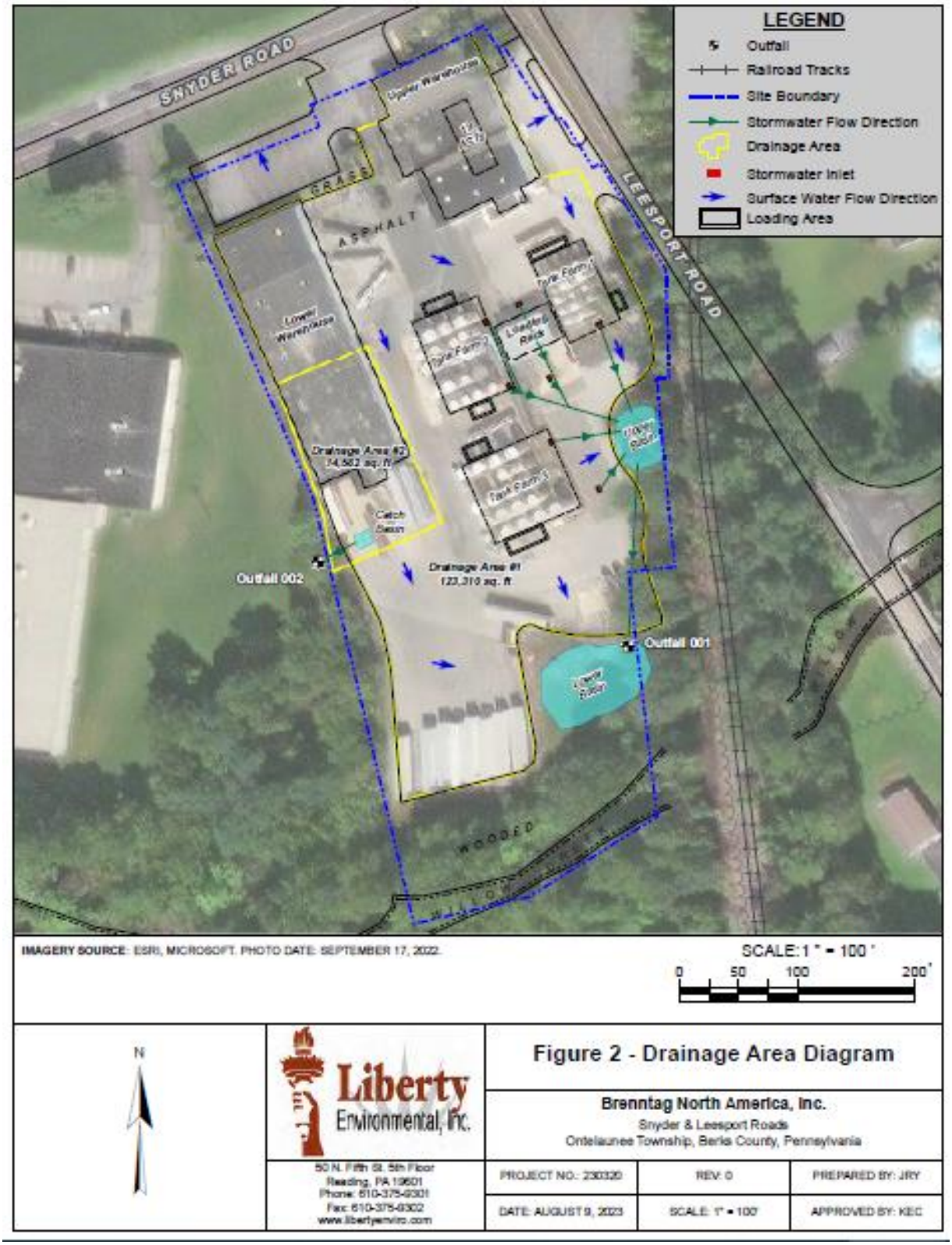

Figure 2. Site Plan