



Application Type  
Facility Type  
Major / Minor

New  
Storm Water  
Minor

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

Application No. **PA0294551**  
APS ID **1122489**  
Authorization ID **1500971**

**Applicant and Facility Information**

Applicant Name	<u>XPO Inc.</u>	Facility Name	<u>XPO Inc. BCA</u>
Applicant Address	<u>2211 Old Earhart Road</u>	Facility Address	<u>100 Roadway Drive</u>
Applicant Contact	<u>Ann Arbor, MI 48105-2963</u>	Facility Contact	<u>Carlisle, PA 17015-8812</u>
Applicant Phone	<u>(734) 210-5854</u>	Facility Phone	<u>(717) 494-9438</u>
Client ID	<u>144965</u>	Site ID	<u>264575</u>
SIC Code	<u>4213</u>	Municipality	<u>Middlesex Township</u>
SIC Description	<u>Trans. &amp; Utilities - Trucking, Except Local</u>	County	<u>Cumberland</u>
Date Application Received	<u>September 24, 2024</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>October 16, 2024</u>	If No, Reason	
Purpose of Application	<u>NPDES discharge of stormwater associated with industrial activity.</u>		

**Summary of Review**

This is a new application for a NPDES individual permit for discharges of stormwater associated with industrial activity located in Middlesex Township, Cumberland County. The facility was previously permitted by YRC Inc. under PAS803508. YRC Inc. ceased operations and terminated their permit in September 2023. XPO Inc. has since bought the property and applied for a new permit as a result. See Figure 1 and Figure 2 for a Site Location Map and Site Plan.

The facility's primary SIC code is 4213 (trucking, except local) which requires an NPDES permit. Since the facility discharges to an HQ surface water, the facility must be covered 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.

Facility Description: Trucking facility with loading docks, a main office, maintenance shop and fueling bays for trucks, and storage areas.

An application was received on 9/24/2024. The application was deemed complete on 10/16/2024.

The facility has one outfall: Outfall 001. Outfall 001 receives potential runoff from loading and unloading trucks, truck parking, dumpster staging, truck maintenance, truck fueling, AST filling, and storage. Outfall 001 is at the outlet of a retention basin located in the southeastern corner of the property and discharges to a UNT to Letort Spring Run (HQ-CWF, MF).

The facility also has 4 oil/water separators, an EQ tank, and a pretreatment facility on-site that collects wastewater from the trench pit in the tractor shop and from drains in the fuel bays prior to entering the sanitary sewer system. An additional oil/water separator is located at the forklift shop and discharges to the stormwater conveyance system which eventually drains to Outfall 001.

Approve	Deny	Signatures	Date
X		<i>Jacob S. Rakowsky</i> Jacob S. Rakowsky, E.I.T. / Project Manager	10/30/2024
X		<i>Scott M. Arwood</i> Scott M. Arwood, P.E. / Environmental Engineer Manager	10/30/2024

### Summary of Review

Per the application, the PPC Plan was last updated in September 2024.

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 (stormwater)
Latitude	40° 13' 45.21"	Longitude	-77° 7' 52.05"
Wastewater Description: Stormwater associated with industrial activity.			
Receiving Waters	Unnamed Tributary to Letort Spring Run (CWF, MF)	Stream Code	10262
NHD Com ID	56405535	RMI	0.23
Drainage Area	2.15 sq. mi.	Yield (cfs/mi <sup>2</sup> )	
Q <sub>7-10</sub> Flow (cfs)	6.56	Q <sub>7-10</sub> Basis	StreamStats
Watershed No.	7-B	Chapter 93 Class.	HQ-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	PA American Water Co West		
PWS Waters	Conodoguinet Creek	Municipality	Silver Spring Twp, Cumberland County
PWS RMI	17.42	Distance from Outfall (mi)	~15.1

Drainage Area (sf): 5,239,396.8

% Impervious: 36%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:  
Truck loading/unloading, dumpster staging, truck fueling, maintenance, and salt storage.

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:  
Retention basin.

Compliance History	
<b>Summary of DMRs:</b>	Since this is an application for a new permit, DMR data is not available. A summary of application sampling results can be found in Table 1 below.  The facility was not required to submit impairment sampling since the receiving water had no impairments. The discharge is not expected to cause impairments.
<b>Summary of Inspections:</b>	Since this is an application for a new permit, inspections have not been conducted at the site.

**Other Comments:** The client currently has open violations that should be resolved prior to issuance of the final permit. A summary of the client's open violations can be found in Table 2 below.

**Table 1.** Application Sampling Results for Outfall 001

Pollutant	Concentration
Oil and Grease (mg/L)	<5.21
BOD5 (mg/L)	11.3
COD (mg/L)	<20.0
TSS (mg/L)	20.0
TN (mg/L)	0.823
TP (mg/L)	<0.100
pH (S.U.)	7.55

**Table 2.** Open Violations for XPO Inc., Client ID 144965

PF ID	FACILITY	PF KIND	INSP PROGRAM	PROGRAM SPECIFIC ID	INSP ID	VIOLATION ID	VIOLATION DATE	VIOLATION	INSP REGION
661751	XPO LOGISTICS FREIGHT XHG	Transportation	Storage Tanks	28-39004	3852170	8204824	07/23/2024	Failure to conduct periodic tests of overfill prevention equipment	SCRO
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661751	XPO LOGISTICS FREIGHT XHG	Transportation	Storage Tanks	28-39004	3852903	8204966	07/23/2024	Failure to comply with UST system periodic equipment testing requirements	SCRO
555714	XPO LOGISTICS FREIGHT INC - XWB (WILKES-BARRE)	Stormwater-Industrial	WPC NPDES	PAR802234	3515665	987333	03/22/2023	NPDES - Failure to submit monitoring report(s) or properly complete monitoring reports	NERO

**Proposed Effluent Limitations and Monitoring Requirements**

Based on the facility's **SIC Code of 4213**, 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 <sup>(1),(2)</sup>		Benchmark Values
	Minimum Measurement Frequency	Sample Type	
Total Nitrogen (mg/L) <sup>(3)</sup>	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 (NO<sub>2</sub>+NO<sub>3</sub>-N), where TKN and NO<sub>2</sub>+NO<sub>3</sub>-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):**

Since the facility was previously permitted under PAS803508 and is not proposing a new or increased discharge to a High-Quality (HQ) or Exceptional Value (EV) water, the applicant was not required to submit Module 1 (Anti Degradation Module).

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 Letort Spring Run (HQ-CWF, MF)

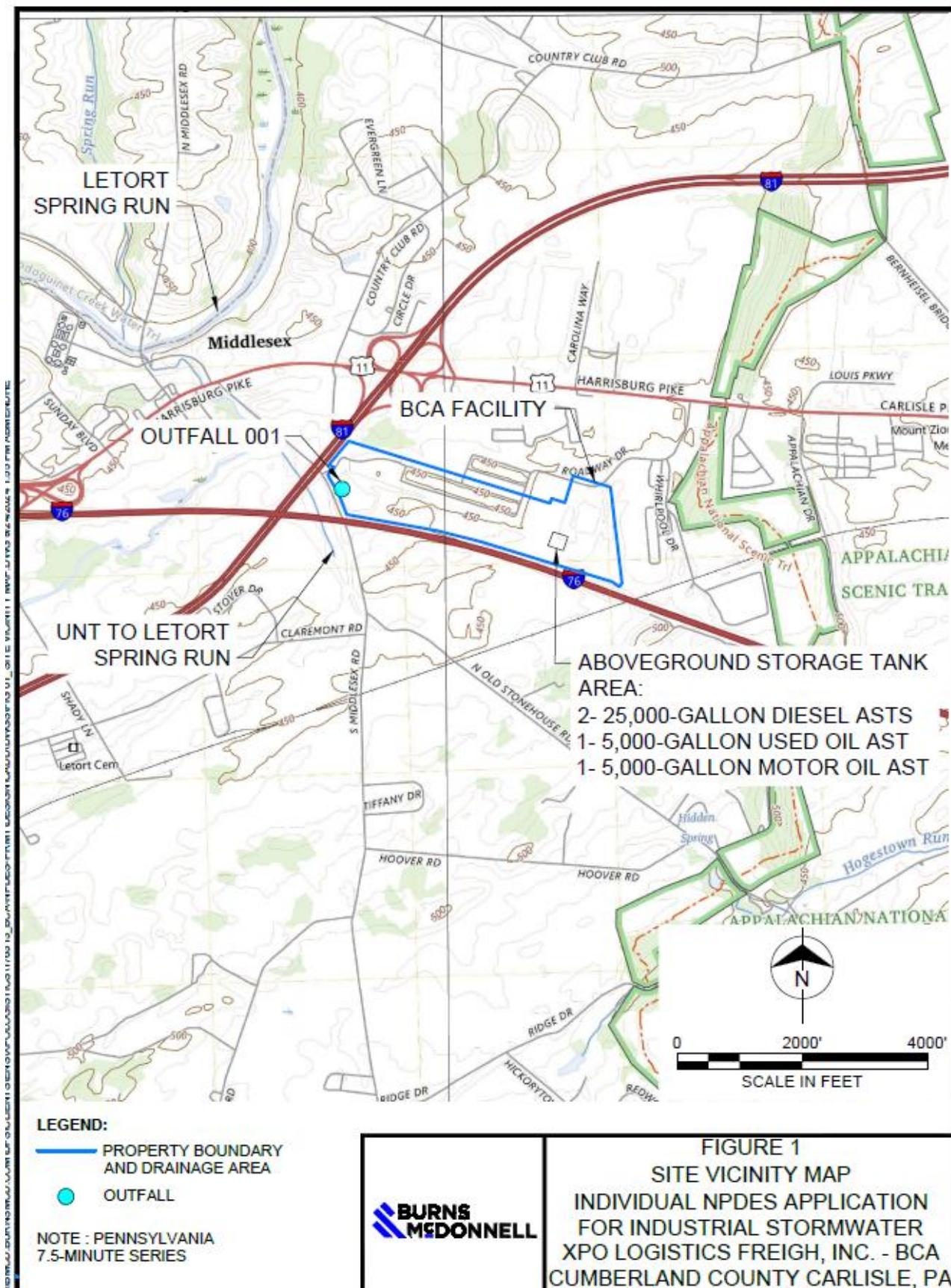


Figure 1. Site Location Map

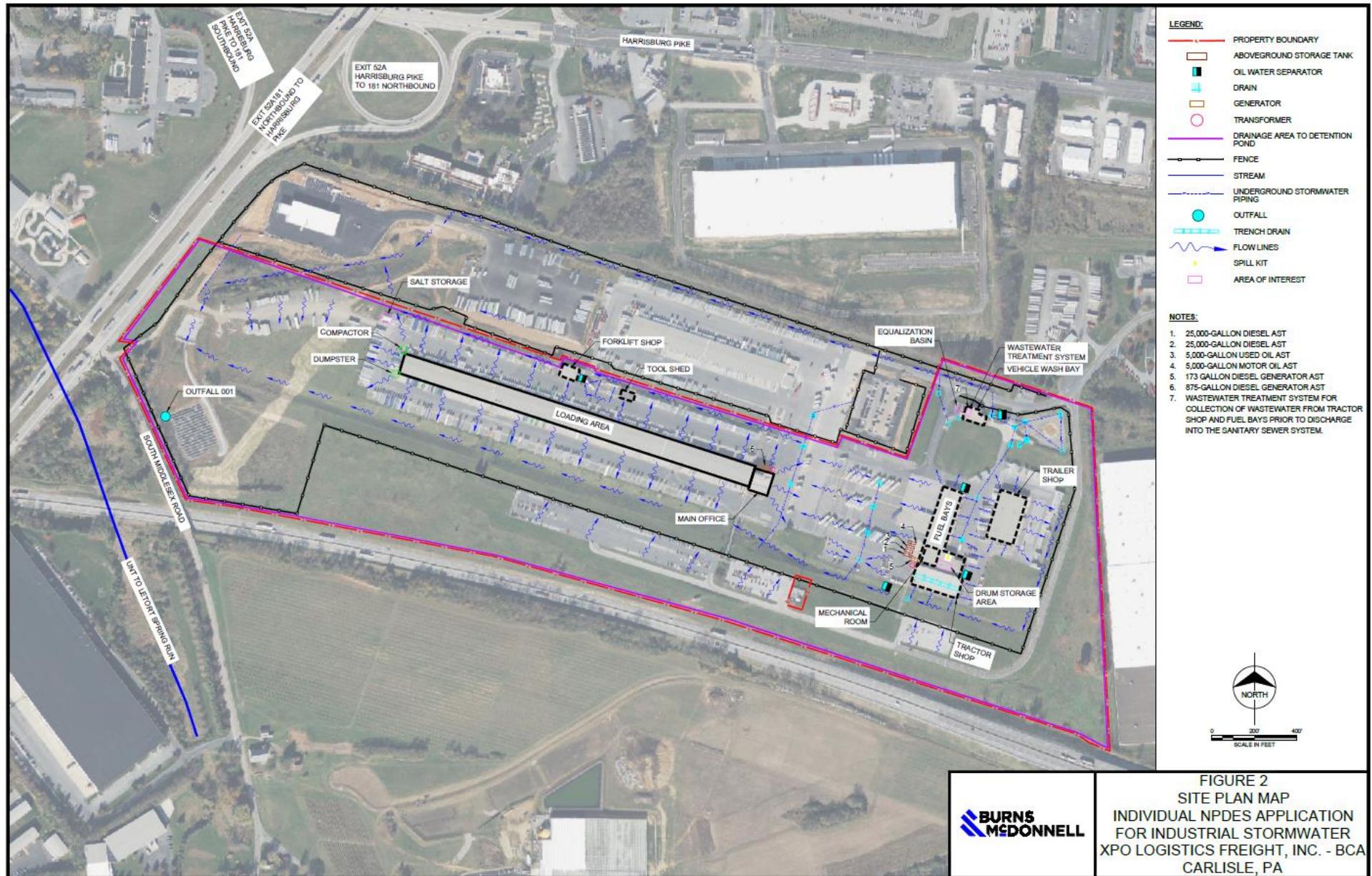


Figure 2. Site Plan