

Application Type Renewal
Facility Type Storm Water
Major / Minor Minor

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

Application No. PAS123501
APS ID 919154
Authorization ID 1465908

Applicant and Facility Information

| | | | |
|---------------------------|---|------------------|--|
| Applicant Name | <u>Treehouse Private Brands Inc.</u> | Facility Name | <u>Linette Quality Chocolates Inc. / Treehouse Private Brands Inc.</u> |
| Applicant Address | <u>336 Hill Road</u> <u>Womelsdorf, PA 19567-9200</u> | Facility Address | <u>336 Hill Road</u> <u>Womelsdorf, PA 19567-9200</u> |
| Applicant Contact | <u>Alexis Kline</u> | Facility Contact | <u>Alexis Kline</u> |
| Applicant Phone | <u>(610) 589-4526</u> | Facility Phone | <u>(610) 589-4526</u> |
| Client ID | <u>325844</u> | Site ID | <u>248094</u> |
| SIC Code | <u>2066</u> | Municipality | <u>Heidelberg Township</u> |
| SIC Description | <u>Manufacturing - Chocolate And Cocoa Products</u> | County | <u>Berks</u> |
| Date Application Received | <u>December 21, 2023</u> | EPA Waived? | <u>Yes</u> |
| Date Application Accepted | <u>January 2, 2024</u> | If No, Reason | <u></u> |
| Purpose of Application | <u>NPDES discharge of stormwater associated with industrial activity.</u> | | |

Summary of Review

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

The facility's primary SIC code is 2066 (chocolate and cocoa products) which requires an NPDES permit. Since the facility discharges to an HQ-CWF 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 I based on their SIC Code.

Facility Description, from Application: Manufacturer of chocolate confections.

An application was received via Public Uploads Ref ID 101664 on 12/21/2023. A revised application was received via Public Uploads Ref ID 102689 on 12/27/2023. A deficiency notice was sent via email on 1/2/2024. The deficiencies were addressed on 1/2/2024. The application was deemed complete on 1/2/2024.

The facility has one outfall that discharges to a UNT to Tulpehocken Creek (HQ-CWF, MF): Outfall 001. Stormwater at the facility is conveyed to two detention basins, Basin 1 and Basin 2, via a network of underground pipes and stormwater inlets. Roof leaders convey stormwater from the roof to Basin 2. All flow from Basin 2 is conveyed into the Basin 1 before leaving the site.

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

| Approve | Deny | Signatures | Date |
|---------|------|--|----------|
| X | | <i>Jacob S. Rakowsky</i> Jacob S. Rakowsky, E.I.T. / Project Manager | 1/3/2024 |
| X | | <i>Scott M. Arwood</i> Scott M. Arwood, P.E. / Environmental Engineer Manager | 1/4/2024 |

Summary of Review

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. | <u>001</u> | Design Flow (MGD) | <u>N/A</u> |
| Latitude | <u>40° 21' 25.11"</u> | Longitude | <u>-76° 10' 6.57"</u> |
| Wastewater Description: <u>Stormwater associated with industrial activity.</u> | | | |
| Receiving Waters | <u>Unnamed Tributary to Tulpehocken Creek (HQ-CWF, MF)</u> | Stream Code | <u>1950</u> |
| NHD Com ID | <u>26003874</u> | RMI | <u>1.38</u> |
| Drainage Area | <u>0.62</u> | Yield (cfs/mi ²) | <u></u> |
| Q ₇₋₁₀ Flow (cfs) | <u>0.245</u> | Q ₇₋₁₀ Basis | <u>StreamStats</u> |
| Watershed No. | <u>3-C</u> | Chapter 93 Class. | <u>HQ-CWF, MF</u> |
| Existing Use | <u></u> | Existing Use Qualifier | <u></u> |
| Exceptions to Use | <u></u> | Exceptions to Criteria | <u></u> |
| Assessment Status | <u>Impaired</u> | | |
| Cause(s) of Impairment | <u>CAUSE UNKNOWN</u> | | |
| Source(s) of Impairment | <u>SOURCE UNKNOWN</u> | | |
| TMDL Status | <u></u> | Name | <u></u> |
| Nearest Downstream Public Water Supply Intake | <u>Western Berks Water Authority</u> | | |
| PWS Waters | <u>Tulpehocken Creek</u> | Municipality | <u>Lower Heidelberg Township, Berks County</u> |
| PWS RMI | <u>6.70</u> | Distance from Outfall (mi) | <u>20</u> |

Drainage Area: 42,096 SF

% Impervious: 44%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:

From Application, paved guest and employee parking lots, access road, loading/unloading docks, grassy areas, and rooftop drainage.

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

From application, treatment via Detention Basins 1 and 2.

| Compliance History | |
|--------------------------------|--|
| Summary of DMRs: | <p>A summary of available eDMR data from 2021 through 2023 can be found in Table 1 below.</p> <p>The facility was also required to submit E. Coli and Fecal Coliform sampling results due to the pathogen impairment of the receiving water. The discharge is not expected to cause or contribute to the impairment.</p> |
| Summary of Inspections: | <p>An administrative/file review was conducted on 9/9/2020. No violations were noted.</p> <p>The client currently has no open violations.</p> |

Table 1. Outfall 001 eDMR Sampling results from 2021 through 2023.

| Sampling Results | | | | | | | | PADEP References | | |
|----------------------|---------------|---------------|---------------|---------------|---------------|------|-------|------------------|-------------------------------|------------------------|
| | 1st Half 2021 | 2nd Half 2021 | 1st Half 2022 | 2nd Half 2022 | 1st Half 2023 | Max | Avg | MCL (mg/L) | No Exposure Conditions (mg/L) | PAG03 Benchmark (mg/L) |
| BOD5 | 8.9 | 5.3 | 8 | 4.5 | 14.6 | 14.6 | 8.26 | None | </= 10 | 30 |
| COD | 48.6 | 43.6 | 68.8 | 24.4 | 44.9 | 68.8 | 46.06 | None | </= 30 | 120 |
| pH | 8.54 | 7.09 | 7.55 | 8.45 | 8.17 | 8.54 | 7.96 | 6.5 to 8.5 S.U. | 6.0 to 9.0 S.U. | 6.0 to 9.0 S.U. |
| TSS | 10 | 14.5 | 27 | 4 | 5 | 27 | 12.1 | None | </= 30 | 100 |
| Oil and Grease | < 4.9 | < 6.4 | < 4.9 | < 5.0 | < 5.3 | 6.4 | 5.3 | | </= 5.0 | 30 |
| Nitrate-Nitrite as N | 0.6 | 0.74 | 0.98 | 0.25 | 0.47 | 0.98 | 0.608 | None | None | 3 |
| TN | - | - | - | 0.7 | 1.96 | 1.96 | 1.33 | None | </= 2.0 | None |
| TKN | - | - | - | 0.7 | 1.49 | 1.49 | 1.095 | None | None | None |
| TP | - | - | - | 0.15 | 0.2 | 0.2 | 0.175 | None | </= 1.0 | None |

Summary of eDMRs: Available eDMR data from 2021 through 2023 showed that concentrations did not exceed PAG03 benchmarks.

Based on the facility's **SIC Code of 2066**, the **applicable PAG-03** NPDES Permit for Discharges of Stormwater Associated with Industrial Activity (effective 3/24/2023) appendix is **Appendix I**, which would include the following monitoring requirements:

Table 3. PAG-03, Appendix I 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 |
| 5-Day Biochemical Oxygen Demand (BOD5) (mg/L) | 1 / 6 months | Grab | 30 |
| Total Suspended Solids (TSS) (mg/L) | 1 / 6 months | Grab | 100 |
| Chemical Oxygen Demand (mg/L) | 1 / 6 months | Grab | 120 |
| Nitrate + Nitrite-Nitrogen (mg/L) | 1 / 6 months | Grab | XXX |
| Oil and Grease (mg/L) | 1 / 6 months | Grab | 120 |

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

The facility was previously required to sample for pH, BOD5, TSS, COD, Nitrate + Nitrite-Nitrogen, and Oil and Grease. These parameters will be retained for the renewal, consistent with PAG03 Appendix I (effective 3/24/2023). TN and TP sampling will be added as a requirement for this permit, which is consistent with PAG03 Appendix I.

Table 4. Proposed Monitoring Requirements

| Parameter | Effluent Limitations | | | | Monitoring Requirements ^{(1),(2)} | |
|---|-----------------------|-----------------|---------------|------------------|--|----------------------|
| | Concentrations (mg/L) | | | | Minimum Measurement Frequency | Required Sample Type |
| | Minimum | Average Monthly | Daily Maximum | Instant. Maximum | | |
| Total Nitrogen (mg/L) ⁽³⁾ | 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 |
| 5-Day Biochemical Oxygen Demand (BOD5) (mg/L) | XXX | XXX | Report | XXX | 1/6 months | Grab |
| Total Suspended Solids (TSS) (mg/L) | XXX | XXX | Report | XXX | 1/6 months | Grab |
| Chemical Oxygen Demand (mg/L) | XXX | XXX | Report | XXX | 1/6 months | Grab |
| Nitrate + Nitrite-Nitrogen (mg/L) | XXX | XXX | Report | XXX | 1/6 months | Grab |
| Oil and Grease (mg/L) | XXX | XXX | Report | XXX | 1/6 months | Grab |
| pH (S.U.) | XXX | XXX | Report | XXX | 1/6 months | Grab |

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.

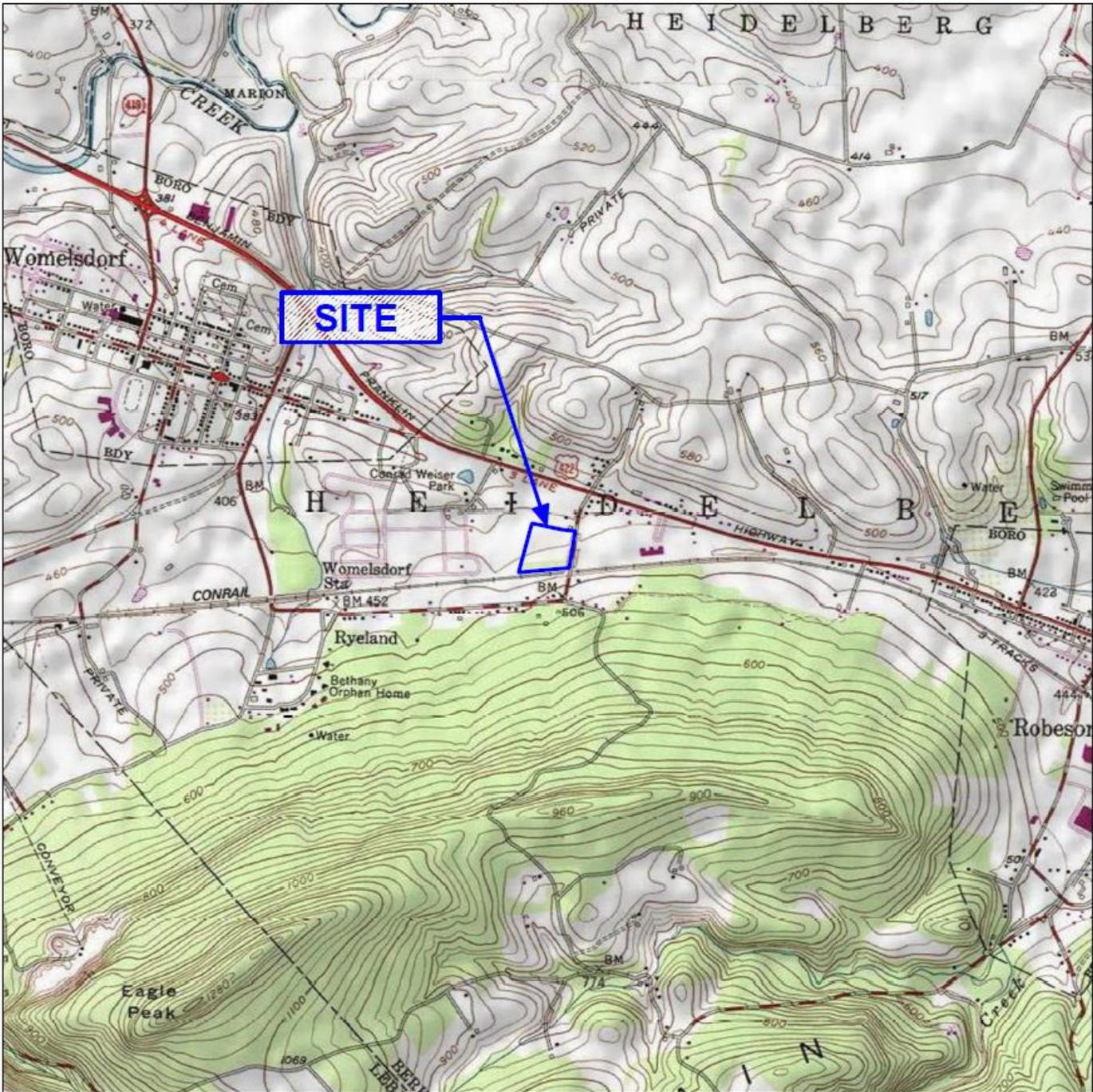
All required parameters from PAG-03 Appendix I are included in this permit.
 Benchmarks for pH of 9.0 S.U., BOD5 of 30 mg/L, TSS of 100 mg/L, COD of 120 mg/L, and Oil and Grease of 30 mg/L are included, which is typical of the monitoring requirements for PAG-03 Appendices (effective 3/24/2023).
 The BMPs from Appendix I 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.

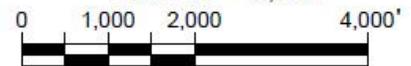
The effluent limits for this discharge have been developed to ensure that existing instream water uses and the level of water quality necessary to protect the existing uses are maintained and protected. Best Management Practices will ensure that the existing instream uses are protected. No Exceptional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

The designated use of the receiving waters are as follows:
 Unnamed Tributary to Tulpehocken Creek (HQ-CWF, MF)



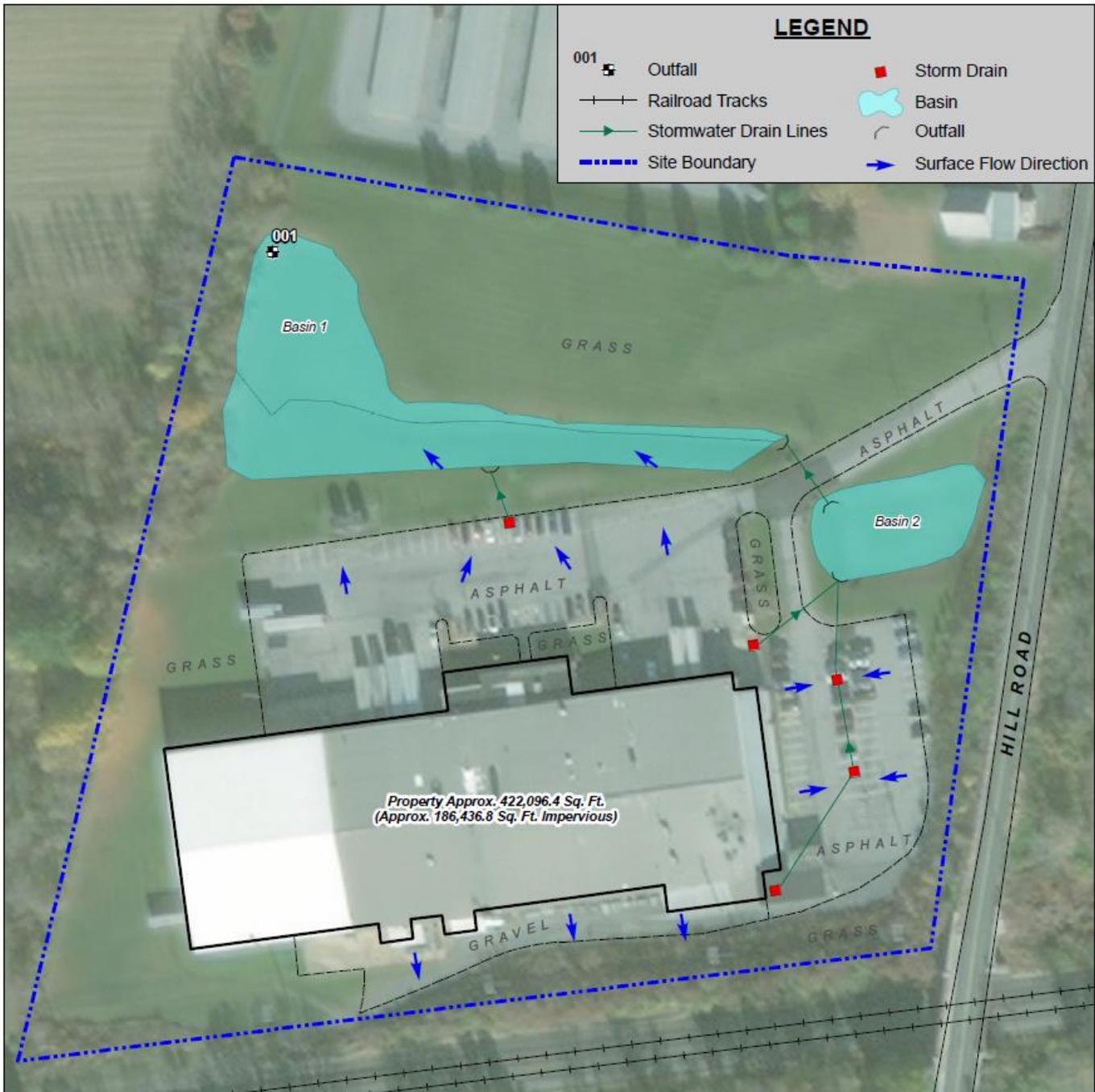
SOURCE: USA TOPO MAPS - COPYRIGHT © 2013 NATIONAL GEOGRAPHIC SOCIETY, I-CUBED.
 WOMELSDORF (1984), PENNSYLVANIA 7.5-MINUTE QUADRANGLE.

SCALE: 1" = 2,000'

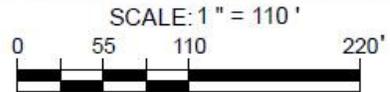


| | | | | |
|---|-------------------------|--|------------------|--|
| | | Figure 1 - Site Location Map | | |
| | | Linette Quality Chocolates 336 Hill Road, Womelsdorf, PA 19601 Heidelberg Township, Berks County, Pennsylvania Lat/Long: 40° 21' 25.11" N / 76° 10' 06.57" W | | |
| 505 Penn St. Suite 400 Reading, PA 19601 Phone: 610-375-9301 www.libertyenviro.com | PROJECT NO.: 210107 | REV: 0 | PREPARED BY: KDW | |
| | DATE: FEBRUARY 21, 2022 | SCALE: 1" = 2,000' | APPROVED BY: KEC | |

Figure 1. Site Location



NOTE: THIS DRAWING INTENDED FOR ILLUSTRATIVE PURPOSES ONLY, AS PART OF A SITE CHARACTERIZATION.
 NOT TO BE USED AS A BASIS FOR ENGINEERING OR DESIGN.
 AERIAL IMAGE: ESRI, MICROSOFT, LANCASTER PA. PHOTO DATE: NOVEMBER 18, 2016.



| | | | | |
|---|---------------------|--|------------------|--|
| | | Figure 2 - Drainage Area Diagram | | |
| | | Linette Quality Chocolates 336 Hill Road, Womelsdorf, PA 19601 Heidelberg Township, Berks County, Pennsylvania Lat/Long: 40° 21' 25.11" N / 76° 10' 06.57" W | | |
| 505 Penn St. Suite 400 Reading, PA 19601 Phone: 610-375-9301 www.libertyenviro.com | PROJECT NO.: 210107 | REV: 1 | PREPARED BY: KDW | |
| DATE: FEBRUARY 21, 2022 | SCALE: 1" = 110' | APPROVED BY: KEC | | |

Figure 2. Site Plan