



Application Type  
Facility Type  
Major / Minor

Renewal  
Storm Water  
Minor

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

Application No. **PAS142202**  
APS ID **1136438**  
Authorization ID **1525707**

**Applicant and Facility Information**

Applicant Name	<b>Packaging Corporation of America</b>	Facility Name	<b>Packaging Corporation of America</b>
Applicant Address	7451 Cetronia Road	Facility Address	7451 Cetronia Road
Applicant Contact	Jordan Meersand	Facility Contact	Jordan Meersand
Applicant Phone	(610) 366-6500	Facility Phone	(610) 366-6500
Client ID	135696	Site ID	529394
SIC Code	2653	Municipality	Upper Macungie Township
SIC Description	Manufacturing - Corrugated and Solid Fiber Boxes	County	Lehigh
Date Application Received	May 2, 2025	EPA Waived?	Yes
Date Application Accepted		If No, Reason	-
Purpose of Application	<b>INDIVIDUAL NPDES STORMWATER PERMIT RENEWAL</b>		

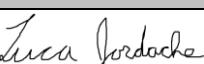
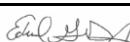
**Summary of Review**

This is a redraft of the individual NPDES industrial stormwater permit PAS142202 for Packaging Corporation of America in Allentown, PA. Comments received from the DEP Operations section and the permittee are addressed at the bottom of this summary.

The applicant is requesting renewal of the individual NPDES permit PAS142202 to discharge stormwater associated with industrial activity to Iron Run, a High-Quality, Cold-Water Fishes (HQ-CWF) designated stream in state water plan basin 02-C. As per the Department's current existing use list, Iron Run does not currently have an existing use more protective than its designated use. Iron Run drains into Spring Creek, which drains into the Little Lehigh Creek, a tributary to the Lehigh River. The discharge is not expected to have an effect on any public water supply. Iron Run is currently considered impaired for aquatic life by the Pennsylvania Integrated Water Quality Monitoring and Assessment Report; the cause is siltation from urban runoff / storm sewers.

The facility is classified under SIC code 2653 (Corrugated Boxes) and contains a stormwater retention basin. The basin has a top weir that allows flow to a private sewer system and then outfall 001 to Iron Run. The nearest public water supply is the Lehigh County Authority, approximately 17 miles downstream just before the Little Lehigh Creek joins the Lehigh River. The discharge is not expected to affect the public water supply. The applicant is consistently within limits on eDMR forms and currently has no active violations that would prohibit a permit renewal or issuance.

Reporting requirements have been added for Total Nitrogen and Total Phosphorous to match the monitoring requirements listed in Appendix E of the PAG-03 general permit. There are not limits or benchmark values for these pollutants. The semi-annual average and daily maximum must be reported every 6 months for both of these pollutants. This allows for the permittee to sample more frequently if desired to demonstrate a consistent average, as opposed to any outliers that may appear.

Approve	Deny	Signatures	Date
X		 Luca Jordache / Environmental Engineer Trainee	August 11, 2025
X		 Edward Dudick / Environmental Engineer Manager	August 12, 2025

### Summary of Review

The previous permit included hard limits for TSS, COD, and pH, which was standard procedure for stormwater permits at the time of issuance. The Department's guidance has changed since then to apply benchmark values instead of hard limits on stormwater permits. As per the Department guidance, hard limits on this permit have been adjusted to become reporting requirements with benchmark values following Appendix E of the PAG-03 general permit.

Benchmark values are not effluent limitations, and exceedances do not constitute permit violations. However, if the permittee's sampling demonstrates exceedances of benchmark values for two or more consecutive monitoring periods, the permittee shall take action in accordance with Part C III.G of the included permit being issued.

The existing permit will expire on October 31, 2025. The permit renewal application was received on time on May 2<sup>nd</sup>, 2025.

The EPA Waiver is in effect.

The following documents were used to aid in the creation of this Fact Sheet:



Watershed  
Information.pdf



Appendix E.pdf



Individual  
Industrial Waste Effl

#### COMMENTS RECEIVED:

Comment received from PA DEP Operations Section: "Is there a reason hard limits for TSS and COD are listed in Part A.I.A? Operations was under the impression that the Department was getting away from hard limits and instead using benchmark values upon renewal? Thank you."

**Following the Department's guidance regarding hard limits vs. benchmark values, the permit has been adjusted. The previous permit contained hard limits for pH, COD, and TSS, which will no longer be carried over to the new permit. Former hard limits will be adjusted into reporting requirements with a benchmark value designated from Appendix E in the PAG-03 general permit.**

Comment received from Permittee: "The DRAFT NPDES permit lists Total Nitrogen and Total Phosphorous as requiring an 8-hour composite sample and for the value to be reported as Total Load in pounds. I believe this is an error as the stormwater NPDES permits require grab samples and for the values to be reported in mg/L."

**The Total Nitrogen and Total Phosphorous reporting requirements requiring 8-hr composite samples have been adjusted to match Appendix E of the PAG-03 general permit benchmarks. Total Nitrogen now has a calculation sample type and Total Phosphorous now has a grab sample type. Both pollutants will be measured in mg/L.**

#### 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.

<b>Discharge Information</b>			
Outfall No:	001	Design Flow (MGD):	0
Latitude:	40° 33' 2.14"	Longitude:	-75° 36' 27.70"
Quad Name:	-	Quad Code:	-
Wastewater Description:	Stormwater		
<b>Receiving Waters Information</b>			
Receiving Waters:	Iron Run (HQ-CWF)	Stream Code:	3594
NHD Com ID:	26295587	RMI:	1.62
Drainage Area:	10.5	Yield (cfs/mi <sup>2</sup> ):	0.35
Q <sub>7-10</sub> Flow (cfs):	3.72	Q <sub>7-10</sub> Basis:	StreamStats Calculation
Elevation (ft):	386	Slope (ft/ft):	0.114
Watershed No:	02-C	Chapter 93 Class:	HQ-CWF
Existing Use:	-	Existing Use Qualifier:	-
Exceptions to Use:	-	Exceptions to Criteria:	-
Assessment Status:	Impaired		
Cause(s) of Impairment:	FLOW REGIME MODIFICATION, SILTATION		
Source(s) of Impairment:	URBAN RUNOFF/STORM SEWERS, URBAN RUNOFF/STORM SEWERS		
TMDL Status:	-	Name:	-
<b>Water Supply Information</b>			
Nearest Downstream Public Water Supply Intake:	Lower Saucon TWP Authority		
PWS Waters:	Little Lehigh Creek	Flow at Intake (cfs):	36.2 (Q <sub>7/10</sub> )
PWS RMI:	17.02	Distance from Outfall (mi):	7.69

## Proposed Effluent Limitations and Monitoring Requirements

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (386-0400-001), SOPs and/or BPJ.

**Outfall 001, Effective Period: Permit Effective Date through Permit Expiration Date.**

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Semi-Annual Average	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report (Benchmark: 9.0)	XXX	1 / 6 Months	Grab
Chemical Oxygen Demand (COD) (mg/L)	XXX	XXX	XXX	XXX	Report (Benchmark: 120)	XXX	1 / 6 Months	Grab
Total Suspended Solids (TSS) (mg/L)	XXX	XXX	XXX	XXX	Report (Benchmark: 100)	XXX	1 / 6 Months	Grab
Total Phosphorus (mg/L)	XXX	XXX	XXX	Report	Report	XXX	1 / 6 Months	Grab
Total Nitrogen (mg/L)	XXX	XXX	XXX	Report	Report	XXX	1 / 6 Months	Calculation

Compliance Sampling Location: Outfall 001

Tools and References Used to Develop Permit	
<input type="checkbox"/>	Water Quality Toxics Management Strategy, 361-0100-003, 4/06.
<input type="checkbox"/>	Technical Guidance for the Development and Specification of Effluent Limitations, 386-0400-001, 10/97.
<input type="checkbox"/>	Policy for Permitting Surface Water Diversions, 386-2000-019, 3/98.
<input type="checkbox"/>	Policy for Conducting Technical Reviews of Minor NPDES Renewal Applications, 386-2000-018, 11/96.
<input type="checkbox"/>	Technology-Based Control Requirements for Water Treatment Plant Wastes, 386-2183-001, 10/97.
<input type="checkbox"/>	Technical Guidance for Development of NPDES Permit Requirements Steam Electric Industry, 386-2183-002, 12/97.
<input type="checkbox"/>	Pennsylvania CSO Policy, 386-2000-002, 9/08.
<input type="checkbox"/>	Water Quality Antidegradation Implementation Guidance, 391-0300-002, 11/03.
<input type="checkbox"/>	Implementation Guidance Evaluation & Process Thermal Discharge (316(a)) Federal Water Pollution Act, 386-2000-008, 4/97.
<input type="checkbox"/>	Determining Water Quality-Based Effluent Limits, 386-2000-004, 12/97.
<input type="checkbox"/>	Implementation Guidance Design Conditions, 386-2000-007, 9/97.
<input type="checkbox"/>	Technical Reference Guide (TRG) WQM 7.0 for Windows, Wasteload Allocation Program for Dissolved Oxygen and Ammonia Nitrogen, Version 1.0, 386-2000-016, 6/2004.
<input type="checkbox"/>	Interim Method for the Sampling and Analysis of Osmotic Pressure on Streams, Brines, and Industrial Discharges, 386-2000-012, 10/1997.
<input type="checkbox"/>	Implementation Guidance for Section 95.6 Management of Point Source Phosphorus Discharges to Lakes, Ponds, and Impoundments, 386-2000-009, 3/99.
<input type="checkbox"/>	Technical Reference Guide (TRG) PENTOXSD for Windows, PA Single Discharge Wasteload Allocation Program for Toxics, Version 2.0, 386-2000-015, 5/2004.
<input type="checkbox"/>	Implementation Guidance for Section 93.7 Ammonia Criteria, 386-2000-022, 11/97.
<input type="checkbox"/>	Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers, 386-2000-013, 4/2008.
<input type="checkbox"/>	Implementation Guidance Total Residual Chlorine (TRC) Regulation, 386-2000-011, 11/1994.
<input type="checkbox"/>	Implementation Guidance for Temperature Criteria, 386-2000-001, 4/09.
<input type="checkbox"/>	Implementation Guidance for Section 95.9 Phosphorus Discharges to Free Flowing Streams, 386-2000-021, 10/97.
<input type="checkbox"/>	Implementation Guidance for Application of Section 93.5(e) for Potable Water Supply Protection Total Dissolved Solids, Nitrite-Nitrate, Non-Priority Pollutant Phenolics and Fluorides, 386-2000-020, 10/97.
<input type="checkbox"/>	Field Data Collection and Evaluation Protocol for Determining Stream and Point Source Discharge Design Hardness, 386-2000-005, 3/99.
<input type="checkbox"/>	Implementation Guidance for the Determination and Use of Background/Ambient Water Quality in the Determination of Wasteload Allocations and NPDES Effluent Limitations for Toxic Substances, 386-2000-010, 3/1999.
<input type="checkbox"/>	Design Stream Flows, 386-2000-003, 9/98.
<input type="checkbox"/>	Field Data Collection and Evaluation Protocol for Deriving Daily and Hourly Discharge Coefficients of Variation (CV) and Other Discharge Characteristics, 386-2000-006, 10/98.
<input type="checkbox"/>	Evaluations of Phosphorus Discharges to Lakes, Ponds and Impoundments, 386-3200-001, 6/97.
<input type="checkbox"/>	Pennsylvania's Chesapeake Bay Tributary Strategy Implementation Plan for NPDES Permitting, 4/07.
<input type="checkbox"/>	  Individual NPDES General NPDES SOP SOP - Industrial Was- PAG-03 (Version 1.0)