pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

**Southwest Regional Office**
**CLEAN WATER PROGRAM**

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|---|---|---|---|
| Application Type | **Renewal** | Application No. | **PAS146102** |
| Facility Type | **Storm Water** | APS ID | **706204** |
| Major / Minor | **Minor** | Authorization ID | **812173** |

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

## Applicant and Facility Information

| | | | |
|---|---|---|---|
| Applicant Name | **International Paper Company** | Facility Name | **Eighty Four Container Plant** |
| Applicant Address | 10 Wilson Road | Facility Address | 10 Wilson Road |
| | Eighty Four, PA 15330-2846 | | Eighty Four, PA 15330-2846 |
| Applicant Contact | Joe Valania | Facility Contact | Myron Braggs |
| Applicant email | Joe.Valania@ipaper.com | Facility email | Myron.Braggs@ipaper.com |
| Client ID | 81651 | Site ID | 466180 |
| SIC Code | 2653 | Municipality | North Strabane Township |
| SIC Description | Corrugated and Solid Fiber Boxes | County | Washington |
| Date Application Received | October 14, 2009 | EPA Waived? | Yes |
| Date Application Accepted | October 29, 2009 | If No, Reason | |
| Purpose of Application | Renewal NPDES Permit Coverage | | |

## Summary of Review

The Department received a renewal NPDES permit application from International Paper Company to continue coverage of their Eighty Four Container Plant on October 14, 2009. The site manufactures corrugated sheets and corrugated cartons. The site has an SIC code of 2653, Manufacturing-Corrugated and Solids Fiber Boxes.

The site has two stormwater outfalls. Outfall 001 discharges to an unnamed tributary to Chartiers Creek and Outfall 002 discharges to an unnamed tributary of Chartiers Creek, both designated in 25 pa code 93 as a high-quality warm water fishery. Outfall 001 discharges stormwater from the northern portion of the site. Stormwater runs as sheet flow to a storm water retention pond where it discharges via Outfall 001 to an unnamed tributary to Chartiers Creek. Outfall 002 discharges stormwater from the southern portion of the site. Stormwater from the site parking lot and grassy areas discharges as sheet flow to a storm water detention pond and the site roof drains are piped to the detention pond where it discharges via Outfall 002 to a stormwater culvert along state road 519 that ultimately discharges to an unnamed tributary of Chartiers Creek.

The site is located in a high-quality watershed. In 1988 the facility instituted a non-discharge alternative for the process wastewater that was generated from the site operations. Therefore, the only discharge that remained at the site was stormwater. A formal anti-degradation module was not submitted with the previous applications; however, it was determined that non-discharge alternatives were considered and are currently being employed at the site. The only wastewater that will actively discharge from the site is stormwater runoff. The Department has determined that there are not technically feasible, cost effective or environmentally sound alternatives to the stormwater discharge. Non-degrading limitations were not developed or imposed because the discharge consists of stormwater only. To ensure that the discharge does not degrade the receiving streams, no exposure benchmark values will be used in place of the standard stormwater benchmark values in the permit. The goal for the permittee is to consistently achieve these benchmark values; doing this shows that the discharges are uncontaminated stormwater and will maintain and protect the existing quality of the receiving waters. A Part C condition is included in the Draft Permit requiring a Corrective Action Plan when there is an exceedance of the benchmark

| Approve | Deny | Signatures | Date |
|---|---|---|---|
| X | | Adam Olesnanik / Project Manager | 2/24/2022 |
| X | | Michael E. Fifth, P.E. / Environmental Engineer Manager | 2/24/2022 |

**Summary of Review**

values, which are also included in the Part C condition. As described above, if there is an exceedance of the benchmark values, a Corrective Action Plan must be conducted to evaluate site stormwater controls and BMPs. Benchmark monitoring is a feedback tool, along with routine inspections and visual assessments, for assessing the effectiveness of stormwater controls and BMPs

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) | 0 |
| Latitude | 40º 13' 01.01" | Longitude | -80º 08' 09.33" |
| Quad Name | Washington East | Quad Code | 1704 |
| Wastewater Description: | Stormwater | | |
| Receiving Waters | Unnamed Tributary to Chartiers Creek (HQ-WWF) | Stream Code | 36945 |
| NHD Com ID | 99693982 | RMI | 7.29 |
| Watershed No. | 20-F | Chapter 93 Class. | HQ-WWF |
| Existing Use | | Existing Use Qualifier | |
| Exceptions to Use | | Exceptions to Criteria | |
| Assessment Status | Impaired | | |
| Cause(s) of Impairment | Nutrients, Pathogens, Siltation | | |
| Source(s) of Impairment | Habitat Modification - Other Than Hydromodification, Source Unknown, Urban Runoff/Storm Sewers | | |
| TMDL Status | Final | Name | Chartiers Creek Watershed |

**Discharge, Receiving Waters and Water Supply Information**

| | | | |
|---|---|---|---|
| Outfall No. | 002 | Design Flow (MGD) | 0 |
| Latitude | 40º 12' 53.7" | Longitude | -80º 08' 05.2" |
| Quad Name | Washington East | Quad Code | 1704 |
| Wastewater Description: | Stormwater | | |
| Receiving Waters | Unnamed Tributary of Chartiers Creek (HQ-WWF) | Stream Code | 36977 |
| NHD Com ID | 99694064 | RMI | 0.28 |
| Watershed No. | 20-F | Chapter 93 Class. | HQ-WWF |
| 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 | Final | Name | Chartiers Creek Watershed |

## Development of Effluent Limitations

**Outfall No.** 001 **Design Flow (MGD)** 0
**Latitude** 40º 13' 01.01" **Longitude** -80º 08' 09.33"
**Wastewater Description:** Stormwater

**Outfall No.** 002 **Design Flow (MGD)** 0
**Latitude** 40º 12' 53.7" **Longitude** -80º 08' 05.2"
**Wastewater Description:** Stormwater

### Technology-Based Limitations

Stormwater Technology Limits

Outfalls 001 and 002 will be subject to PAG-03 General Stormwater Permit conditions as a minimum requirement because the outfalls receive stormwater. The SIC code for the site is 2653 and the corresponding appendix of the PAG-03 that would apply to the facility is Appendix E. The reporting requirements applicable to stormwater discharges are shown in Table 1 below. Along with the monitoring requirements, sector specific BMPs included in Appendix E of the PAG-03 will also be included in Part C of the Draft Permit.

**Table 1: PAG-03 Appendix (E) Monitoring Requirements**

| Parameter | Max Daily Concentration | Measurement Frequency | Sample Type |
|---|---|---|---|
| pH | Monitor and Report | 1/6 Months | Grab |
| Chemical Oxygen Demand (COD) | Monitor and Report | 1/6 Months | Grab |
| Total Suspended Solids (TSS) | Monitor and Report | 1/6 Months | Grab |

### Water Quality-Based Limitations

Stormwater WQBELs

Water quality analyses are typically performed under low-flow (Q7-10) conditions. Stormwater discharges occur at variable rates and frequencies but not however during Q7-10 conditions. Since the discharges from Outfalls 001 and 002 are composed entirely of stormwater, a formal water quality analysis cannot be accurately conducted. Accordingly, water quality-based effluent limitations based on water quality analyses are not proposed.

Anti-Degradation

Antidegradation regulations under Chapter 93.4c(a)(l)(i) required discharges to protect the existing use of receiving waters. Chapter 93.4c(b) requires dischargers to consider non-discharge alternatives, public participation and social/economic justification when proposing new, additional or increased discharges to high quality or exceptional value streams. Existing use protection required under Chapter 93.4c(a)(l)(i) is ensured for discharges to high quality streams imposing the most stringent of technology-based, water quality based and non-degrading effluent limitations. In this case, non-degradation effluent limitations are not applicable because the discharge is stormwater only. To ensure that the discharge does not degrade the stream, the no exposure benchmark values will be used as the benchmark value for TSS and COD in the permit. The goal for the permittee is to discharge wastewater consistently below these benchmark values; doing this shows that the discharges are uncontaminated stormwater and will maintain and protect the existing quality of the receiving waters.

**Anti-Backsliding**

Previous limits can be used pursuant to EPA's anti-backsliding regulation, 40 CFR 122.44(l). Previous Limits imposed at Outfalls 001 and 002 are displayed below in Table 2

**Table 2. Existing Effluent Limitations**

| Parameter | Average Monthly | Daily Maximum | Measurement Frequency | Sample Type |
|---|---|---|---|---|
| Flow (MGD) | Report | Report | 1/Quarter | Estimate |
| Total Suspended Solids (TSS) | XXX | Report | 1/Quarter | Grab |
| Chemical Oxygen Demand (COD) | XXX | Report | 1/Quarter | Grab |
| pH (S.U.) | XXX | Between 6.0 and 9.0 | 1/Quarter | Grab |

**Proposed Effluent Limitations and Monitoring Requirements**

The proposed effluent monitoring requirements for Outfalls 001 and 002 are displayed in Table 3 below, they are the most stringent values from the above effluent limitation development. The sample frequency has been reduced to semi-annually to be consistent with the PAG-03 general permit sampling frequency. The Flow monitoring requirement has been removed because typically, flow monitoring is not imposed on stormwater discharges. A Part C condition is included in the Draft Permit requiring submission of a Corrective Action Plan whenever there is an exceedance of the benchmark values, which are also included in the Part C condition. The benchmark values are also displayed below in Table 3. These values are not effluent limitations, an exceedance of the benchmark value is not a violation. As describe above, if there is an exceedance of the benchmark values, a Corrective Action Plan must be developed and submitted to the Department to evaluate site stormwater controls and BMPs. Benchmark monitoring is a feedback tool, along with routine inspections and visual assessments, for assessing the effectiveness of stormwater controls and BMPs. An exceedance of the benchmark provides permittees with an indication that the facility's controls may not be sufficiently controlling pollutants in stormwater. To ensure that the discharge is not degrading the high-quality waters, the no exposure benchmark values will be used as the benchmark values in the permit.

**Table 3: Proposed Effluent Monitoring Requirements**

| Parameter | Max Daily Concentration | Benchmark Values (mg/L) | Measurement Frequency | Sample Type |
|---|---|---|---|---|
| pH | Between 6.0 and 9.0 | - | 1/6 Months | Grab |
| Chemical Oxygen Demand (COD) | Monitor and Report | 30 | 1/6 Months | Grab |
| Total Suspended Solids (TSS) | Monitor and Report | 30 | 1/6 Months | Grab |

| Tools and References Used to Develop Permit | |
|---|---|
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| ☐ | WQM for Windows Model (see Attachment ) |
| ☐ | Toxics Management Spreadsheet (see Attachment ) |
| ☐ | TRC Model Spreadsheet (see Attachment ) |
| ☐ | Temperature Model Spreadsheet (see Attachment ) |
| ☐ | Water Quality Toxics Management Strategy, 361-0100-003, 4/06. |
| ☐ | Technical Guidance for the Development and Specification of Effluent Limitations, 362-0400-001, 10/97. |
| ☐ | Policy for Permitting Surface Water Diversions, 362-2000-003, 3/98. |
| ☐ | Policy for Conducting Technical Reviews of Minor NPDES Renewal Applications, 362-2000-008, 11/96. |
| ☐ | Technology-Based Control Requirements for Water Treatment Plant Wastes, 362-2183-003, 10/97. |
| ☐ | Technical Guidance for Development of NPDES Permit Requirements Steam Electric Industry, 362-2183-004, 12/97. |
| ☐ | Pennsylvania CSO Policy, 385-2000-011, 9/08. |
| ☐ | Water Quality Antidegradation Implementation Guidance, 391-0300-002, 11/03. |
| ☐ | Implementation Guidance Evaluation & Process Thermal Discharge (316(a)) Federal Water Pollution Act, 391-2000-002, 4/97. |
| ☐ | Determining Water Quality-Based Effluent Limits, 391-2000-003, 12/97. |
| ☐ | Implementation Guidance Design Conditions, 391-2000-006, 9/97. |
| ☐ | Technical Reference Guide (TRG) WQM 7.0 for Windows, Wasteload Allocation Program for Dissolved Oxygen and Ammonia Nitrogen, Version 1.0, 391-2000-007, 6/2004. |
| ☐ | Interim Method for the Sampling and Analysis of Osmotic Pressure on Streams, Brines, and Industrial Discharges, 391-2000-008, 10/1997. |
| ☐ | Implementation Guidance for Section 95.6 Management of Point Source Phosphorus Discharges to Lakes, Ponds, and Impoundments, 391-2000-010, 3/99. |
| ☐ | Technical Reference Guide (TRG) PENTOXSD for Windows, PA Single Discharge Wasteload Allocation Program for Toxics, Version 2.0, 391-2000-011, 5/2004. |
| ☐ | Implementation Guidance for Section 93.7 Ammonia Criteria, 391-2000-013, 11/97. |
| ☐ | Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers, 391-2000-014, 4/2008. |
| ☐ | Implementation Guidance Total Residual Chlorine (TRC) Regulation, 391-2000-015, 11/1994. |
| ☐ | Implementation Guidance for Temperature Criteria, 391-2000-017, 4/09. |
| ☐ | Implementation Guidance for Section 95.9 Phosphorus Discharges to Free Flowing Streams, 391-2000-018, 10/97. |
| ☐ | 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, 391-2000-019, 10/97. |
| ☐ | Field Data Collection and Evaluation Protocol for Determining Stream and Point Source Discharge Design Hardness, 391-2000-021, 3/99. |
| ☐ | 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, 391-2000-022, 3/1999. |
| ☐ | Design Stream Flows, 391-2000-023, 9/98. |
| ☐ | Field Data Collection and Evaluation Protocol for Deriving Daily and Hourly Discharge Coefficients of Variation (CV) and Other Discharge Characteristics, 391-2000-024, 10/98. |
| ☐ | Evaluations of Phosphorus Discharges to Lakes, Ponds and Impoundments, 391-3200-013, 6/97. |
| ☐ | Pennsylvania's Chesapeake Bay Tributary Strategy Implementation Plan for NPDES Permitting, 4/07. |
| ☐ | SOP: |
| ☐ | Other: |