pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southcentral Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PAS203502**
Facility Type	**Storm Water**	APS ID	**330905**
Major / Minor	**Minor**	Authorization ID	**1439069**

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

Applicant and Facility Information

Applicant Name	**Bonney Forge Corp**	Facility Name	**Bonney Forge Corp**
Applicant Address	14496 Croghan Pike Mount Union, PA 17066-8869	Facility Address	14496 Croghan Pike Mount Union, PA 17066-8869
Applicant Contact	Matt Grace	Facility Contact	Matt Grace
Applicant Phone	(814) 542-1186	Facility Phone	(814) 514-1186
Client ID	111653	Site ID	485067
SIC Code	3325,3462,3494	Municipality	Shirley Township
SIC Description	Manufacturing - Iron And Steel Forgings,Manufacturing - Steel Foundries, Nec,Manufacturing - Valves And Pipe Fittings, Nec	County	Huntingdon
Date Application Received	May 4, 2023	EPA Waived?	Yes
Date Application Accepted	May 10, 2023	If No, Reason	

Purpose of Application: NPDES discharge of stormwater associated with industrial activity.

Summary of Review

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

The facility's primary SIC code is 3325 (steel forge) 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 B based on their SIC Code.

Facility Description, from application: The business is a steel forge operation housed in two buildings located on a 25-acre industrial site. The site includes outside steel storage. No process water is discharged from the facility as stormwater.

An application was received via OnBase, reference number 107010, on 5/4/2023. The application was deemed complete on 5/10/2023. A technical deficiency notice was sent via email on 10/18/2023. The deficiencies were addressed on 12/21/2023.

The facility has three outfalls: Outfall 001, Outfall 002, and Outfall 003. Outfall 001 discharges to a UNT to Juniata River (HQ-CWF, MF). Outfall 002 and 003 discharge to the Juniata River (WWF, MF). Outfall 001 and 003 are indicated as No Exposure on the application.

Per the application, the PPC Plan was last updated in April 2022.

Approve	Deny	Signatures	Date
X		*Jacob S. Rakowsky* Jacob S Rakowsky, E.I.T. / Project Manager	3/21/2024
X		*Scott M. Arwood* Scott M. Arwood, P.E. / Environmental Engineer Manager	3/21/2024

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.	001	Design Flow (MGD)	N/A (stormwater)
Latitude	40º 21' 58"	Longitude	-77º 51' 58"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Unnamed Tributary to Juniata River (HQ-CWF, MF)	Stream Code	13241
NHD Com ID	66210477	RMI	0.37
Drainage Area	2.05 sq. mi.	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	Outside StreamStats suggested range	Q_{7-10} Basis	StreamStats
Watershed No.	12-C	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	Mifflintown Municipal Authority		
PWS Waters	Juniata River	Municipality	Milford Township, Juniata County
PWS RMI	37.3	Distance from Outfall (mi)	~42

Drainage Area: 426,928 SF

% Impervious: 73%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:
From application, Parking Area and Building.

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:
From application, Detention Pond.

Outfall 001 was marked as No Exposure on the application.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	002	Design Flow (MGD)	N/A (stormwater)
Latitude	40º 21' 46"	Longitude	-77º 51' 50"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Juniata River (WWF, MF)	Stream Code	11414
NHD Com ID	66210127	RMI	79.1
Drainage Area	2060 sq. mi.	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	206	Q_{7-10} Basis	StreamStats
Watershed No.	12-C	Chapter 93 Class.	WWF, 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	Mifflintown Municipal Authority		
PWS Waters	Juniata River	Municipality	Milford Township, Juniata River
PWS RMI	37.3	Distance from Outfall (mi)	~42

Drainage Area: 371,344 SF

% Impervious: 58%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:
From application, Parking Area, Buildings and Outdoor Steel Storage

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:
From application, Channel Socks.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	003	Design Flow (MGD)	N/A (stormwater)
Latitude	40º 21' 42"	Longitude	-77º 51' 47"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Juniata River (WWF, MF)	Stream Code	11414
NHD Com ID	66210127	RMI	79.1
Drainage Area	2060 sq. mi.	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	206	Q_{7-10} Basis	StreamStats
Watershed No.	12-C	Chapter 93 Class.	WWF, 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	Mifflintown Municipal Authority		
PWS Waters	Juniata River	Municipality	Milford Township, Juniata County
PWS RMI	37.3	Distance from Outfall (mi)	~42

Drainage Area: 326,477 SF

% Impervious: 21%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:
From application, Building and Open/Wooded Area.

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:
From application, None.

Outfall 003 was marked as No Exposure on the application.

Compliance History	
Summary of DMRs:	A summary of eDMR data can be found in Table 1 below.
Summary of Inspections:	The facility was last inspected on 4/13/2023 and 3/5/2024. No violations were noted.

Table 1. 2022 through 2023 eDMR Sampling Results

eDMR Sampling Results								PADEP References		
Outfall	Pollutant	1st Half 2022	2nd Half 2022	1st Half 2023	2nd Half 2023	Max	Avg	MCL (mg/L)	No Exposure Conditions (mg/L)	PAG03 Benchmark (mg/L)
001	pH	7.11	7.83	6.57	7.24	7.83	7.1875	6.5 to 8.5 S.U	6.0 to 9.0 S.U	6.0 to 9.0 S.U
	TSS	35	30.4	<4.0	11	**35**	20.1	None	**</= 30**	100.0
	TKN	Not Required	Not Required	Not Required	Not Required	N/A	N/A	None	None	None
	Nitrate-Nitrite as N	<0.2	0.4542	<0.2	<0.2	0.4542	0.26355	None	None	3.0
	Total Chromium	Not Required	Not Required	Not Required	Not Required	N/A	N/A	0.1	None	None
	Total Copper	<0.01	<0.01	<0.01	<0.01	0.01	0.01	1.0	None	None
	Total Lead	Not Required	Not Required	Not Required	Not Required	N/A	N/A	0.005	None	None
	Total Iron	0.738	0.89	<0.2	4.4	**4.4**	**1.557**	**0.3**	</= 7.0	None
	Total Zinc	<0.02	<0.02	0.0432	0.0313	0.0432	0.028625	5.0	None	None
	Total Aluminum	0.226	0.208	0.144	0.106	**0.226**	0.171	**0.2**	None	None
002	pH	7.02	7.9	7.01	7.15	7.9	7.27	6.5 to 8.5 S.U	6.0 to 9.0 S.U	6.0 to 9.0 S.U
	TSS	8	264	59	12.8	**264**	**85.95**	None	**</= 30**	**100.0**
	TKN	0.73	<2.5	0.685	<0.5	2.5	1.10375	None	None	None
	Nitrate-Nitrite as N	<0.2	0.482	<0.2	<0.2	0.482	0.2705	None	None	3.0
	Total Chromium	<0.005	0.0156	<0.005	<0.005	0.0156	0.00765	0.1	None	None
	Total Copper	<0.01	0.0904	0.0111	0.0214	0.0904	0.033225	1.0	None	None
	Total Iron	1.34	7.38	0.991	2.49	**7.38**	3.05025	0.3	**</= 7.0**	None
	Total Lead	Not Required	Not Required	Not Required	Not Required	N/A	N/A	0.005	None	None

	Total Zinc	0.134	0.277	0.0775	0.145	0.277	0.158375	5.0	None	None
	Total Aluminum	0.281	1.09	0.126	<0.1	**1.09**	**0.39925**	**0.2**	None	None
003	pH	7.66	7.39	6.99	7.44	7.66	7.37	6.5 to 8.5 S.U	6.0 to 9.0 S.U	6.0 to 9.0 S.U
	TSS	33	8	<1.6	6600	**6600**	**1660.65**	None	**</= 30**	**100.0**
	TKN	0.675	<1.0	1.305	29.25	29.25	8.0575	None	None	None
	Nitrate-Nitrite as N	<0.2	0.5782	<0.2	<0.2	0.5782	0.29455	None	None	3.0
	Total Chromium	<0.005	<0.005	<0.005	<0.05	0.05	0.01625	0.1	None	None
	Total Copper	<0.01	<0.01	<0.01	<0.1	0.1	0.0325	1.0	None	None
	Total Iron	2.08	0.443	<0.2	366	**366**	**92.18075**	**0.3**	**</= 7.0**	None
	Total Lead	<0.008	<0.008	<0.008	<0.08	**0.08**	**0.026**	**0.005**	None	None
	Total Zinc	0.0229	<0.02	<0.02	0.699	0.699	0.190475	5.0	None	None
	Total Aluminum	0.441	0.12	<0.1	3.37	**3.37**	**1.00775**	**0.2**	None	None

Bold and underlined values exceeded MCL, NOEX conditions, and/or benchmark.

eDMR Summary:

Outfall 001 eDMRs showed a TSS sample result above No Exposure Conditions but below PAG03 benchmarks. Additional sampling results provided in the renewal application showed sample results for BOD5 of 37 mg/L, which is above a typical PAG03 benchmark of 30 mg/L. Outfall 001 sampling will continue to be required for this permit even though it was indicated as No Exposure on the application.

Outfall 002 eDMRs showed TSS sample results above PAG03 benchmarks and Total Iron sample results above No Exposure Conditions. Additional sampling results provided in the renewal application showed sample results for BOD5 of 79 mg/L, which is above a typical PAG03 benchmark of 30 mg/L. Outfall 002 sampling will continue to be required for this permit.

Outfall 003 eDMRs showed high sample results for TSS, Total Iron, and Total Aluminum. Additional sampling results provided in the renewal application showed sample results for BOD5 of 110 mg/L and COD of 778 mg/L. BOD5 and COD PAG-03 benchmarks are 30 mg/L and 120 mg/L, respectively. A partial inspection was conducted as a result of the high sample results on 3/5/2024. The facility noted that they had issues with Outfall 003's collection point, where they may have captured solids particles and algae and decaying organic matter. DEP advised the facility to change their collection point and method to avoid collection issues in the future. Outfall 001 sampling will continue to be required for this permit even though it was indicated as No Exposure on the application.

In addition to Appendix B parameters, BOD5 and COD sampling will be required at all outfalls for this permit due to high sampling results in the renewal application. Total Chromium sampling will also be required due to possible presence from steel forging.

Proposed Effluent Limitations and Monitoring Requirements

Table 2. Proposed Monitoring Requirements for Outfall 001, Outfall 002, and Outfall 003.

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
TSS (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Aluminum (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Zinc (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Copper (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron(mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Lead (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
COD (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
BOD5 (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Chromium	XXX	XXX	Report	XXX	1/6 months	Grab

All parameters from PAG-03 Appendix B were included. Additionally, COD, BOD5, and Total Chromium were included. Benchmarks for TSS of 100 mg/L, Oil and Grease of 30 mg/L, COD of 120 mg/L, and BOD5 of 30 mg/L were included, which are typical of the monitoring requirements for PAG-03 Appendices.
The BMPs from Appendix B 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:
UNT to Juniata River (HQ-CWF, MF)
Juniata River (WWF, MF)

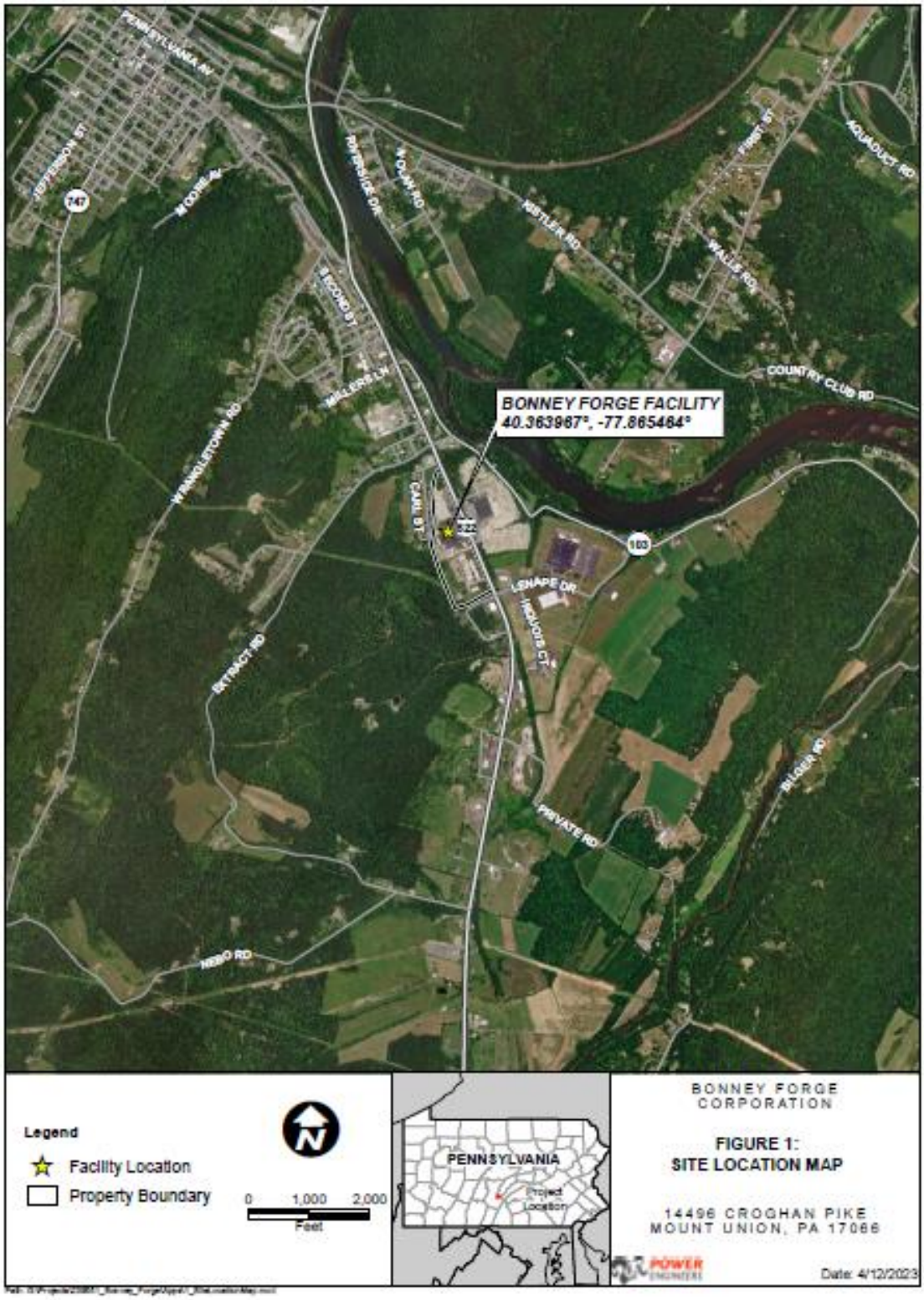

Figure 1. Site Location Map

Figure 2. Site Layout Map