

Application Type Renewal  
Facility Type Storm Water  
Major / Minor Minor

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

Application No. PAS223501  
APS ID 278840  
Authorization ID 1243183

**Applicant and Facility Information**

Applicant Name	<u>Mt Valley Farms &amp; Lumber Products Inc.</u>	Facility Name	<u>Mountain Valley Farms &amp; Lumber Products</u>
Applicant Address	<u>1240 Nawakwa Road Biglerville, PA 17307</u>	Facility Address	<u>1240 Nawakwa Road Biglerville, PA 17307-9727</u>
Applicant Contact	<u>Henry Taylor</u>	Facility Contact	<u></u>
Applicant Phone	<u>(717) 677-6166</u>	Facility Phone	<u></u>
Client ID	<u>139679</u>	Site ID	<u>258548</u>
SIC Code	<u>2448</u>	Municipality	<u>Menallen Township</u>
SIC Description	<u>Manufacturing - Wood Pallets And Skids</u>	County	<u>Adams</u>
Date Application Received	<u>August 14, 2018</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>September 17, 2019</u>	If No, Reason	<u></u>
Purpose of Application	<u>NPDES discharge of stormwater associated with industrial activity.</u>		

**Summary of Review**

A draft permit was issued for this facility on July 29, 2020. Since then, the facility regraded their site, which resulted in changes to their stormwater outfalls. The facility was also working towards compliance by addressing a Corrective Action Plan Request and open violations from DEP. The facility should continue working with DEP to ensure compliance with their permit. Any open violations should be addressed prior to issuance of the final permit.

Due to the changes at the facility and the time since the last draft permit was issued, DEP is redrafting the permit. DEP requested information from the permittee that reflects current conditions at the facility through email and on-site inspections. Based off the requested information received as well as the information provided as part of the original renewal application, DEP is proposing this redrafted permit.

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

The facility's primary SIC code is 2448 (wood pallets and skids) 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 D based on their SIC Code.

Facility description, from revised Application: Recycling of wood pallets and skids.

The facility previously operated a sawmill in addition to the pallet mill, but the sawmill has since burned down and is not in operation.

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

The facility previously had three outfalls: Outfalls 001, 002, and 003.

- The outfall that was formerly 003 is now identified as 001. This is representative outfall for the facility.
- The outfall that was formerly 002 is removed. Industrial activity no longer occurs within this drainage area.
- The outfall that was formerly 001 will be replaced with a non-representative outfall at the location where the stormwater leaves the site into a neighboring farm. This outfall will now be identified as 002.

Outfall 001 discharges to a UNT of Conewago Creek (HQ-CWF, MF). Outfall 002 discharges to Opossum Creek (TSF, MF). See Figure 2 for current site conditions. Sampling will only be required at representative Outfall 001.

Per the revised Application, the PPC Plan was last updated in September 2023.

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>39° 58' 6.00"</u>	Longitude	<u>-77° 19' 9.00"</u>
Wastewater Description: <u>Stormwater associated with industrial activity.</u>			
Receiving Waters	<u>Unnamed Tributary of Conewago Creek (HQ-CWF, MF)</u>	Stream Code	<u>9177</u>
NHD Com ID	<u>57471257</u>	RMI	<u>1.00</u>
Drainage Area	<u>0.13 sq. mi.</u>	Yield (cfs/mi <sup>2</sup> )	<u></u>
Q <sub>7-10</sub> Flow (cfs)	<u>0.0123</u>	Q <sub>7-10</sub> Basis	<u>StreamStats</u>
Watershed No.	<u>7-F</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>Attaining Use(s)</u>		
Cause(s) of Impairment	<u></u>		
Source(s) of Impairment	<u></u>		
TMDL Status	<u></u>	Name	<u></u>
Nearest Downstream Public Water Supply Intake	<u>Wrightsville Borough Municipal Authority</u>		
PWS Waters	<u>Susquehanna River</u>	Municipality	<u>Wrightsville Borough, York County</u>
PWS RMI	<u>28.50</u>	Distance from Outfall (mi)	<u>87.9</u>

Drainage Area: 250,000 SF

% Impervious: 34%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:  
 From revised Application, wood pallets and skids, forklifts, nails.

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:  
 From revised application, riparian buffers, cleaning around work stations at the end of the day, using the magnetic nail pickup.

Outfall 001 is the representative outfall for the facility. This outfall was previously identified as Outfall 003. Sampling is required at this outfall.

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	<u>002</u>	Design Flow (MGD)	<u>N/A</u>
Latitude	<u>39° 58' 15.00"</u>	Longitude	<u>-77° 19' 3.00"</u>
Wastewater Description: <u>Stormwater associated with industrial activity.</u>			
Receiving Waters	<u>Opossum Creek (TSF, MF)</u>	Stream Code	<u>9057</u>
NHD Com ID	<u>57471257</u>	RMI	<u>11.50</u>
Drainage Area	<u>0.5 sq. mi.</u>	Yield (cfs/mi <sup>2</sup> )	<u></u>
Q <sub>7-10</sub> Flow (cfs)	<u>0.063</u>	Q <sub>7-10</sub> Basis	<u>StreamStats</u>
Watershed No.	<u>7-F</u>	Chapter 93 Class.	<u>TSF, MF</u>
Existing Use	<u></u>	Existing Use Qualifier	<u></u>
Exceptions to Use	<u></u>	Exceptions to Criteria	<u></u>
Assessment Status	<u>Attaining Use(s)</u>		
Cause(s) of Impairment	<u></u>		
Source(s) of Impairment	<u></u>		
TMDL Status	<u>Tentative</u>	Name	<u>Opossum Creek</u>
Nearest Downstream Public Water Supply Intake	<u>Possum Valley Municipal Authority</u>		
PWS Waters	<u>Opossum Creek</u>	Municipality	<u>Menallen Township, Adams County</u>
PWS RMI	<u>5.70</u>	Distance from Outfall (mi)	<u>5.6</u>

Drainage Area, from original renewal Application: 94,500 SF

% Impervious: Not provided for drainage area to outfall. Total site is 34% impervious.

Description of Materials/Activities in Drainage Area Exposed to Precipitation:  
 From original renewal Application, wooden pallets.

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:  
 From original renewal Application, diversion pathways.

Outfall 002 is represented by Outfall 001. This outfall was previously identified as Outfall 001. Sampling is not required at this outfall.

Compliance History	
<b>Summary of DMRs:</b>	A summary of available eDMR data from the 2 <sup>nd</sup> half of 2021 through 2023 can be found in Table 2 below.
<b>Summary of Inspections:</b>	<p>A summary of inspection conducted since 2019 can be found in Table 1 below.</p> <p>The client currently has one open violation, issued 12/16/2021, for failure to submit monitoring report(s) or properly complete monitoring reports. The open violation will need to be addressed prior to issuance of the final permit.</p>

**Table 1. Inspections Since 2019.**

PERMIT	INSP ID	INSPECTED DATE	INSP TYPE	INSPECTI ON RESULT DESC	INSPECT OR ID	CREATION DATE	UPDATE DATE	# OF VIOLATIONS
PAS223501	3069600	08/05/2020	Administrative/File Review	Violation(s ) Noted	00635243	08/19/2020	01/31/2022	<u>1</u>
PAS223501	<a href="#">3447326</a>	10/12/2022	Compliance Evaluation	No Violations Noted	00730731	10/26/2022	10/26/2022	<u>0</u>
PAS223501	<a href="#">3080207</a>	09/15/2020	Administrative/File Review	No Violations Noted	00730063	09/15/2020		<u>0</u>
PAS223501	2914011	08/01/2019	Administrative/File Review	Violation(s ) Noted	00635243	08/01/2019	07/16/2020	<u>1</u>
PAS223501	<a href="#">3648584</a>	08/16/2023	Routine/Partial Inspection	No Violations Noted	00730731	11/22/2023	11/22/2023	<u>0</u>
PAS223501	<a href="#">3295782</a>	12/16/2021	Administrative/File Review	Violation(s ) Noted	00677098	12/16/2021	12/16/2021	<u>1</u>
PAS223501	3420642	09/07/2022	Administrative/File Review	Violation(s ) Noted	00745832	09/12/2022	11/22/2022	<u>1</u>
PAS223501	<a href="#">2938036</a>	09/26/2019	Compliance Evaluation	No Violations Noted	00710621	09/27/2019	09/27/2019	<u>0</u>
PAS223501	2905183	07/11/2019	Administrative/File Review	Violation(s ) Noted	00677098	07/11/2019	03/26/2020	<u>1</u>
PAS223501	3269137	08/03/2021	Administrative/File Review	Violation(s ) Noted	00635243	10/20/2021	09/06/2022	<u>1</u>

Table 2. Outfall 001 (formerly 003) eDMR Sampling results for the 2<sup>nd</sup> Half of 2021 through 2023.

Sampling Results								PADEP References		
Pollutant	2nd Half 2021	1st Half 2022	2nd Half 2022	1st Half 2023	2nd Half 2023	Max	Avg	MCLs (mg/L)	PAG03 No Exposure Conditions (mg/L)	PAG03 Benchmark (mg/L)
BOD5	E	E	3.7	4.8	Nothing Reported	4.8	4.25	None	<= 10	30
COD	E	E	< 30	44	Nothing Reported	37	44	None	<= 30	120
Total Iron	E	E	1.4	0.33	Nothing Reported	1.4	0.865	0.3	<= 7.0	None
Nitrate as N	E	E	0.81	2.9	Nothing Reported	2.9	1.855	10	None	None
Nitrite as N	E	E	< 0.40	< 0.40	Nothing Reported	0.4	0.4	1	None	None
Oil and Grease	E	E	< 5	< 5	Nothing Reported	5	5	None	<= 5.0	30
pH	E	E	7.5	7.2	Nothing Reported	7.5	7.35	6.5 to 8.5 S.U	6.0 to 9.0 S.U	6.0 to 9.0 S.U
Dissolved Phosphorus	E	E	0.12	0.33	Nothing Reported	0.33	0.225	None	None	None
TKN	E	E	1.4	2.2	Nothing Reported	2.2	1.8	None	None	None
TSS	E	E	25	72	Nothing Reported	72	48.5	None	<= 30	100

**Summary of DMRs:** eDMR data was only available for Outfall 001 (formerly 003). Former Outfalls 001 and 002 either had No Discharge or No Samples Reported. The available data showed that concentrations did not exceed future benchmarks.

Based on the facility's **SIC Code of 2448**, the **applicable PAG-03** NPDES Permit for Discharges of Stormwater Associated with Industrial Activity (effective 3/24/2023) appendix is **Appendix D**, which would include the following monitoring requirements:

**Table 3.** PAG-03, Appendix D 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
pH (S.U.)	1 / 6 months	Grab	9.0
Chemical Oxygen Demand (mg/L)	1 / 6 months	Grab	120
Total Suspended Solids (TSS) (mg/L)	1 / 6 months	Grab	100
Pentachlorophenol (mg/L) <sup>(4)</sup>	1 / 6 months	Grab	XXX
Total Arsenic (mg/L) <sup>(5)</sup>	1 / 6 months	Grab	XXX
Total Chromium (mg/L) <sup>(5)</sup>	1 / 6 months	Grab	XXX
Total Copper (mg/L) <sup>(5)</sup>	1 / 6 months	Grab	XXX

**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.
- (4) Facilities that use chlorophenolic formulations must monitor for Pentachlorophenol. For all other facilities, monitoring for Pentachlorophenol is optional. If monitoring is not conducted, the permittee shall use a No Data Indicator (NODI) code on the DMR in lieu of sample data.
- (5) Facilities that use chromium/copper/arsenic formulations must monitor for Total Arsenic, Total Chromium and Total Copper. For all other facilities, monitoring for Total Arsenic, Total Chromium and Total Copper is optional. If monitoring is not conducted, the permittee shall use a No Data Indicator (NODI) code on the DMR in lieu of sample data.

**Proposed Effluent Limitations and Monitoring Requirements**

The facility was previously required to sample for BOD5, COD, Total Iron, Nitrate as N, Nitrite as N, Oil and Grease, pH, Dissolved Phosphorus, TKN, and TSS.

- BOD5, Total Iron, Oil and Grease sample results were below PAG03 No Exposure Conditions. These pollutants have been removed from the Draft Permit.
- Nitrate as N, Nitrite as N sample results were below MCLs. These pollutants have been removed from the Draft Permit.
- Dissolved Phosphorus and TKN do not have MCLs or PAG03 No Exposure Conditions associated with them. It is assumed that the parameters from Appendix D, including Total Phosphorus and Total Nitrogen, would be effective in demonstrating the quality of stormwater being discharged from a site with an SIC code of 2448. Therefore, Dissolved Phosphorus and TKN have been removed from the Draft Permit.
- COD, pH, TSS are included in Appendix D and will remain in the Draft Permit.
- The remaining parameters from Appendix D will be included in the Draft Permit.

**Table 4.** Proposed Monitoring Requirements

Parameter	Effluent Limitations				Monitoring Requirements <sup>(1),(2)</sup>	
	Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Total Nitrogen (mg/L) <sup>(3)</sup>	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
Chemical Oxygen Demand (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Suspended Solids (TSS) (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Pentachlorophenol (mg/L) <sup>(4)</sup>	XXX	XXX	Report	XXX	1/6 months	Grab
Total Arsenic (mg/L) <sup>(5)</sup>	XXX	XXX	Report	XXX	1/6 months	Grab
Total Chromium (mg/L) <sup>(5)</sup>	XXX	XXX	Report	XXX	1/6 months	Grab
Total Copper (mg/L) <sup>(5)</sup>	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 (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.
- (4) Facilities that use chlorophenolic formulations must monitor for Pentachlorophenol. For all other facilities, monitoring for Pentachlorophenol is optional. If monitoring is not conducted, the permittee shall use a No Data Indicator (NODI) code on the DMR in lieu of sample data.
- (5) Facilities that use chromium/copper/arsenic formulations must monitor for Total Arsenic, Total Chromium and Total Copper. For all other facilities, monitoring for Total Arsenic, Total Chromium and Total Copper is optional. If monitoring is not conducted, the permittee shall use a No Data Indicator (NODI) code on the DMR in lieu of sample data.

All required parameters from PAG-03 Appendix D are included in this permit.

Benchmarks for pH of 9.0 S.U., COD of 120 mg/L, and TSS of 100 mg/L are included, which is typical of the monitoring requirements for PAG-03 Appendices (effective 3/24/2023).

The BMPs from Appendix D 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:

Opossum Creek (TSF, MF)

UNT to Conewago Creek (HQ-CWF, MF)

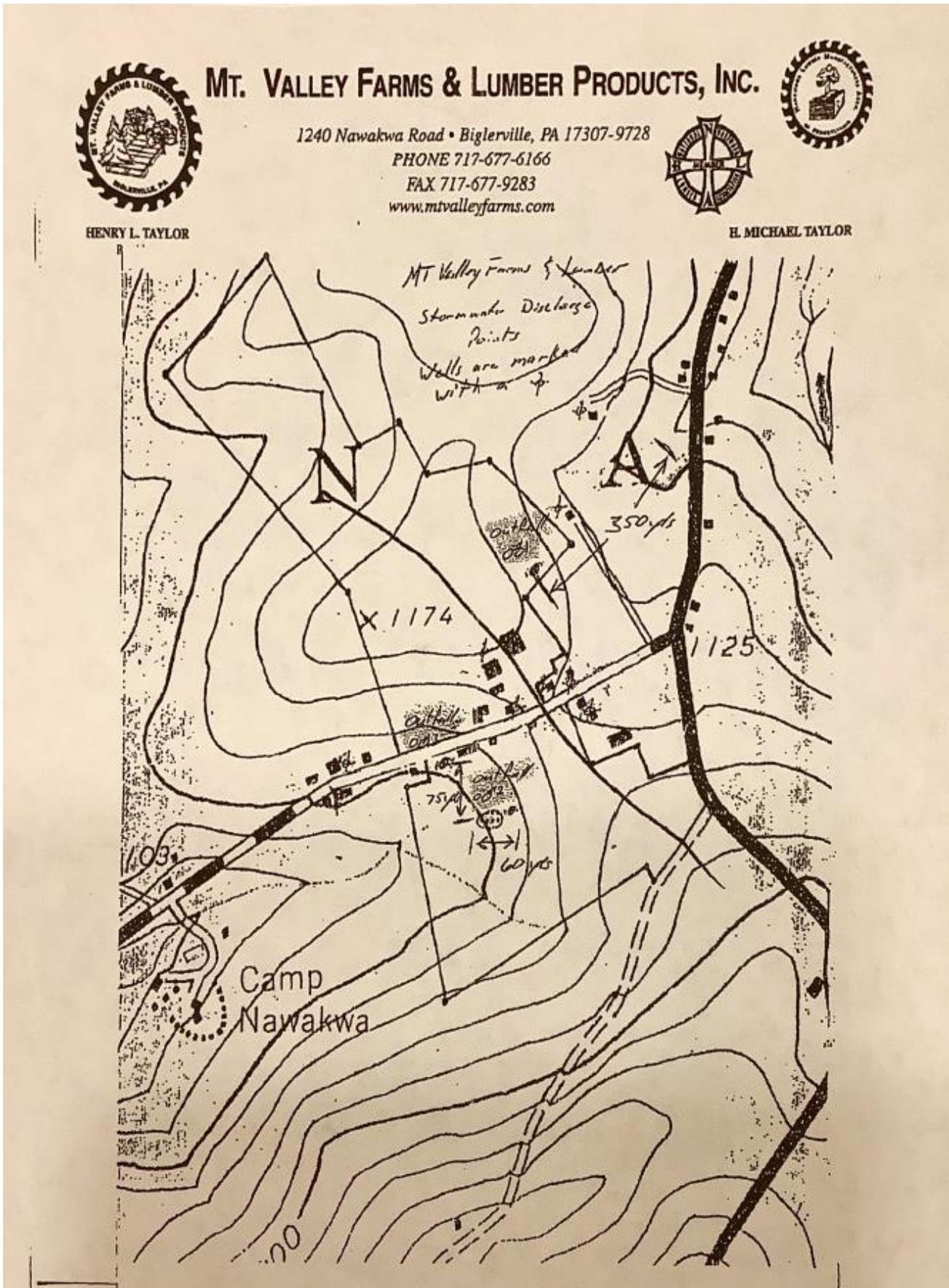


Figure 1. Site Location Map

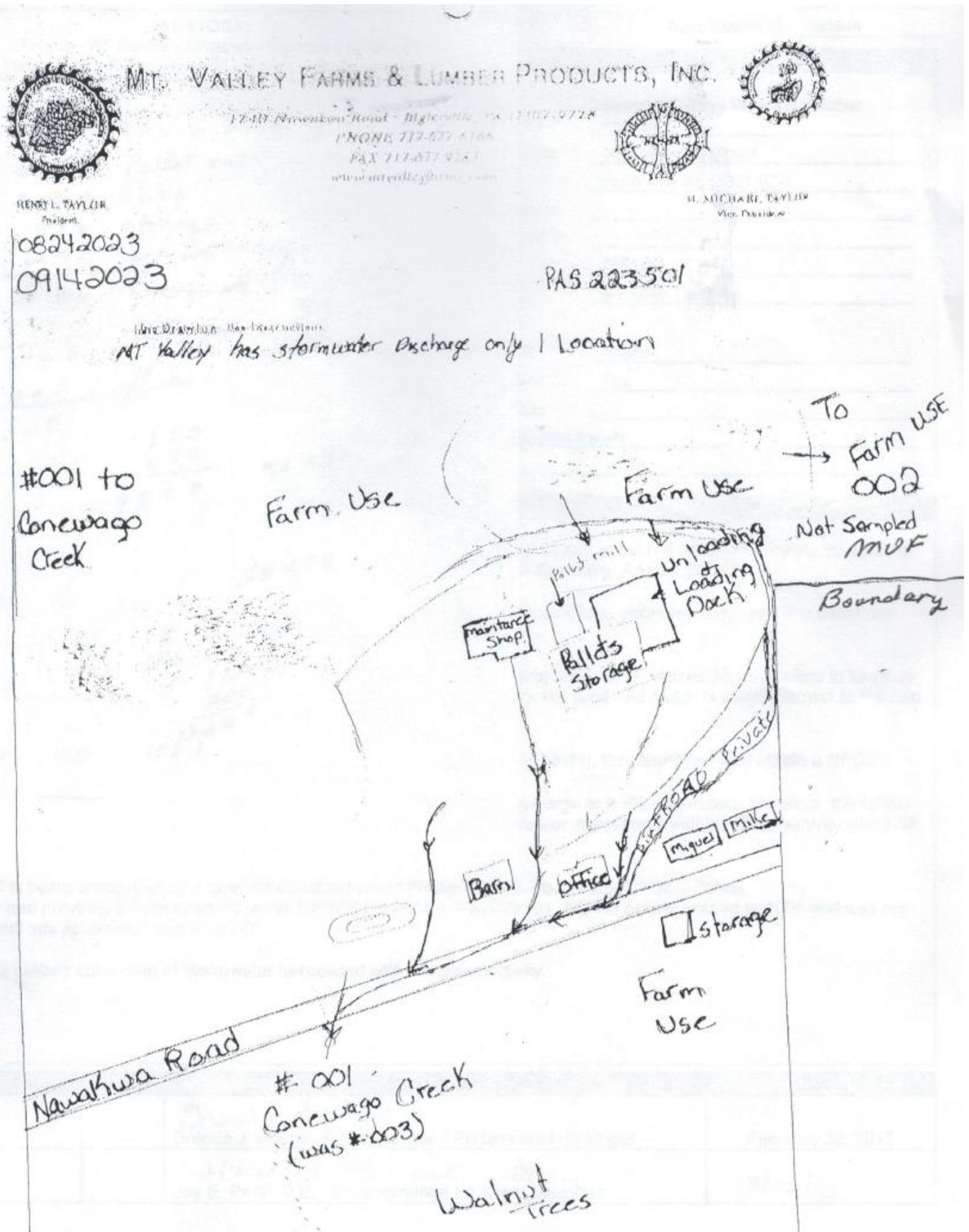


Figure 2. Site Plan