pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southcentral Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PAS223502**
Facility Type	**Storm Water**	APS ID	**935458**
Major / Minor	**Minor**	Authorization ID	**1466404**

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

Applicant and Facility Information

Applicant Name	**Frey Group LLC**	Facility Name	**Frey Group LLC**
Applicant Address	372 Puseyville Road	Facility Address	372 Puseyville Road
	Quarryville, PA 17566-9501		Quarryville, PA 17566-9501
Applicant Contact	Nicole Marusco	Facility Contact	Nicole Marusco
Applicant Phone	(717) 786-2146	Facility Phone	(717) 786-2146
Client ID	334054	Site ID	461159
SIC Code	2875,5099	Municipality	East Drumore Township
SIC Description	Manufacturing - Fertilizers, Mixing Only,Wholesale Trade - Durable Goods, Nec	County	Lancaster
Date Application Received	December 22, 2023	EPA Waived?	Yes
Date Application Accepted	January 2, 2024	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 East Drumore Township, Lancaster County. See Figures 1 and 2 for a Site Plan and Drainage Area Diagram.

The facility's SIC code listed on their renewal application is 2875 (fertilizers, mixing only) which requires an NPDES permit. The facility's NAICS Code listed on their renewal application is 321000 (wood product manufacturing). 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, Appendices D and F would be most applicable based on the facility's description, activities, and SIC and NAICS Codes.

Facility Description, from application: produces soil amendments, potting media, and mulches and stores wholesale material.

A renewal application was received via Public Uploads Ref ID 102434 on 12/22/2023. The application was deemed complete on 1/2/2024. A technical deficiency notice was sent via email on 1/2/2024. The technical deficiency was addressed via email on 1/5/2024.

The facility has three outfalls that discharge to UNT West Branch Octoraro Creek (HQ-CWF, MF): Outfall 001, Outfall 002, and Outfall 003. Outfall 001 and Outfall 002 discharge from retention pond 1 and 2, respectively, located in the central portion of the property. These outfalls discharge stormwater associated with the northern soil blending and mulch areas. Outfall 003 discharges from retention pond 3 located at the southern end of the property that discharges stormwater associated with the southern compost storage and soil mixing area.

Approve	Deny	Signatures	Date
X		*Jacob S. Rakowsky* Jacob S. Rakowsky, E.I.T. / Project Manager	3/8/2024
X		*Scott M. Arwood* Scott M. Arwood, P.E. / Environmental Engineer Manager	3/8/2024

Summary of Review

The facility is also covered under a Water Quality Management (WQM) Permit, WQM Permit 3604201 T-1. Part C Special conditions include language regarding WQM Permit 3604201 T-1.

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

Part C permit conditions require semiannual 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 high-quality receiving stream.

There are currently 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	39º 50' 45"	Longitude	-76º 7' 9"
Wastewater Description:	Stormwater associated with industrial activities.		
Receiving Waters	Unnamed Tributary to West Branch Octoraro Creek (HQ-CWF, MF)	Stream Code	7049
NHD Com ID	57468843	RMI	0.5
Drainage Area	0.57 sq. mi.	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	0.0807	Q_{7-10} Basis	StreamStats
Watershed No.	7-K	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	Tentative	Name	Octoraro Creek Watershed TMDL
Nearest Downstream Public Water Supply Intake	Chester Water Authority		
PWS Waters	Octoraro Reservoir	Municipality	Lower Oxford Twp, Chester County
PWS RMI	12.5	Distance from Outfall (mi)	7.1

Drainage Area: 731,185.9 SF

% Impervious: 61.14%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:
From application, receives runoff from fertilizer building, mix building, truck shop, office and dry storage, and mulch processing operations.

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:
From application, if there were a release in drainage area 1, it would flow to pond 1 where it would be contained until it could be cleaned up.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	002	Design Flow (MGD)	0
Latitude	39º 50' 39"	Longitude	-76º 7' 11"
Wastewater Description:	Stormwater associated with industrial activities.		
Receiving Waters	Unnamed Tributary to West Branch Octoraro Creek (HQ-CWF, MF)	Stream Code	7049
NHD Com ID	57468843	RMI	0.5
Drainage Area	0.57 sq. mi.	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	0.0807	Q_{7-10} Basis	StreamStats
Watershed No.	7-K	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	Tentative	Name	Octoraro Creek Watershed TMDL
Nearest Downstream Public Water Supply Intake	Chester Water Authority		
PWS Waters	Octoraro Reservoir	Municipality	Lower Oxford Twp, Chester County
PWS RMI	12.5	Distance from Outfall (mi)	7.1

Drainage Area: 700,548.4 SF

% Impervious: 44.40%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:
From application, receives runoff from soil blending area, dyed mulch area soil blending area, finished product storage, 10,000 diesel AST.

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:
From application, Drainage area 2 has swales with straw bale check dams to filter suspended solids from the stormwater prior to discharge into Pond 2. If there were a release in drainage area 2, it would flow to pond 2 where it would be contained until it could be cleaned up.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	003	Design Flow (MGD)	N/A (stormwater)
Latitude	39º 50' 24"	Longitude	-76º 7' 6"
Wastewater Description:	Stormwater associated with industrial activity.		
Receiving Waters	Unnamed Tributary to West Branch Octoraro Creek (HQ-CWF, MF)	Stream Code	7047
NHD Com ID	57469285	RMI	0.34
Drainage Area	3.07 sq. mi.	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	0.367	Q_{7-10} Basis	StreamStats
Watershed No.	7-K	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	Tentative	Name	Octoraro Creek Watershed TMDL
Nearest Downstream Public Water Supply Intake	Chester Water Authority		
PWS Waters	Octoraro Reservoir	Municipality	Lower Oxford Twp, Chester County
PWS RMI	12.5	Distance from Outfall (mi)	6.7

Drainage Area: 511,535.5 SF

% Impervious: 100%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:
From application, receives runoff from covered storage building, compost storage and soil blending and compost curing pad.

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:
From application, retention pond 3 does not normally discharge. If there were a release in drainage area 3, it would flow to pond 3 where it would be contained until it could be cleaned up. There is curbing around the paved area to prevent agricultural run-on into drainage area 3.

Compliance History	
Summary of DMRs:	A summary of sampling results reported in the renewal application, which include eDMR data, can be found in Table 1 below.
Summary of Inspections:	The facility was last inspected on 8/12/2019. No violations were noted. The client currently has no open violations.

Table 1. Renewal Application and eDMR Sampling Results for Outfall 001 and 002*

		Outfall 001		Outfall 002			PADEP References		
	Pollutants	Avg	Max	Avg	Max		PAG03 BMs	NEC BMs	SDW MCLs
Appendix F Parameters	TN	3.6	3.6	8.1	8.1		XXX	2.0	XXX
	TP	0.42	0.42	0.9	0.9		XXX	1.0	XXX
	pH	6.4 (min)	7.1	7.0 (min)	8.25		9.0	6.0 to 9.0 S.U.	6.5 to 8.5 S.U.
	COD	454.6	843	316.6	620		120	30.0	XXX
	TSS	80.2	89	37.8	94		100	30.0	XXX
	Nitrate+Nitrite-Nitrogen	XXX	XXX	XXX	XXX		3.0	XXX	XXX
	Total Lead	XXX	XXX	XXX	XXX		XXX	XXX	0.005**
	Total Zinc	XXX	XXX	XXX	XXX		XXX	XXX	5.0
	Total Iron	XXX	XXX	XXX	XXX		XXX	7.0	0.3
	Total Aluminum	XXX	XXX	XXX	XXX		XXX	XXX	0.2
Additional Appendix D Parameters	Arsenic	<4.77	9.4	<0.998	5.9		XXX	XXX	0.01
	Chomium	<1.565	2.8	<0.924	5.5		XXX	XXX	0.1
	Copper	<4.61	8.4	<1.684	10		XXX	XXX	1.0**
	Pentachlorophenol	<3.5916	<15.0	<2.4036	<6		XXX	XXX	0.001
Additional Parameters from Previous Permit	DO	1.5	2.44	105.8	1017		XXX	XXX	XXX
	Color	390	500	505	750		XXX	XXX	15 color units
	TDS	385.2	780	819.2	1190		XXX	XXX	500.0
	Nitrate as N	<0.37	1.1	2.75	7.1		XXX	XXX	10.0
	Phenol	<0.2206	0.51	<0.990	6.9		XXX	XXX	XXX
Additional Parameters from Renewal Application	Oil and Grease	2.6	2.6	2.4	2.4		30	5.0	XXX
	BOD5	20	20	12	12		30	10.0	XXX

*Outfall 003 has not had a discharge in the past 3 years. No sampling results were provided.
**The lead and copper primary MCLs are applicable only to bottled, vended, retail, and bulk water hauling systems.

Summary of eDMR and Application Sampling: Based on the description of the facility's activities and SIC and NAICS Codes, the applicable PAG-03 NPDES Permit for Discharges of Stormwater Associated with Industrial Activity Appendices are D and F. Appendix D and F parameters will be included in the permit. Sample results show that the PAG03 COD benchmark of 100 mg/L has been exceeded. DO, Color, and TDS will be retained in this permit to continue monitoring their concentrations in the facility's stormwater discharge.

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
pH (S.U.)	XXX	XXX	Report	XXX	1/6 months	Grab
COD (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
TSS (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Nitrate + Nitrite-Nitrogen (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Lead (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Zinc (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Aluminum (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Arsenic (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Chromium (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Copper (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Pentachlorophenol (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Dissolved Oxygen (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Color (Pt-Co Units)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Dissolved Solids (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab

Benchmarks for TSS of 100 mg/L, pH of 9.0 S.U., COD of 120 mg/L, and Nitrate+Nitrite-Nitrogen of 3.0 mg/L, which is typical of the monitoring requirements for PAG-03 Appendices.
The BMPs from Appendix D and Appendix F 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 West Branch Octoraro Creek (HQ-CWF, MF)

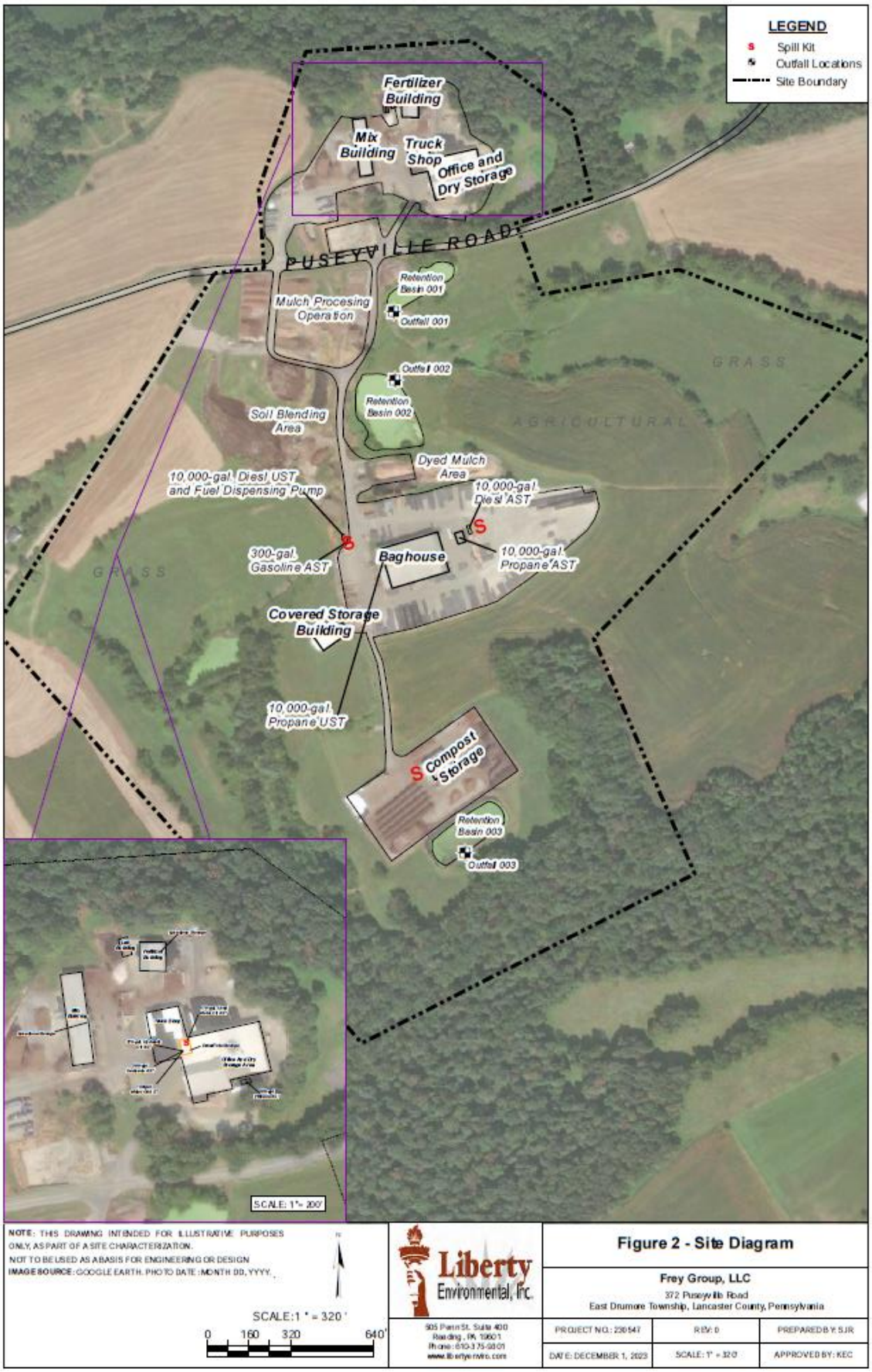

Figure 1. Site Plan

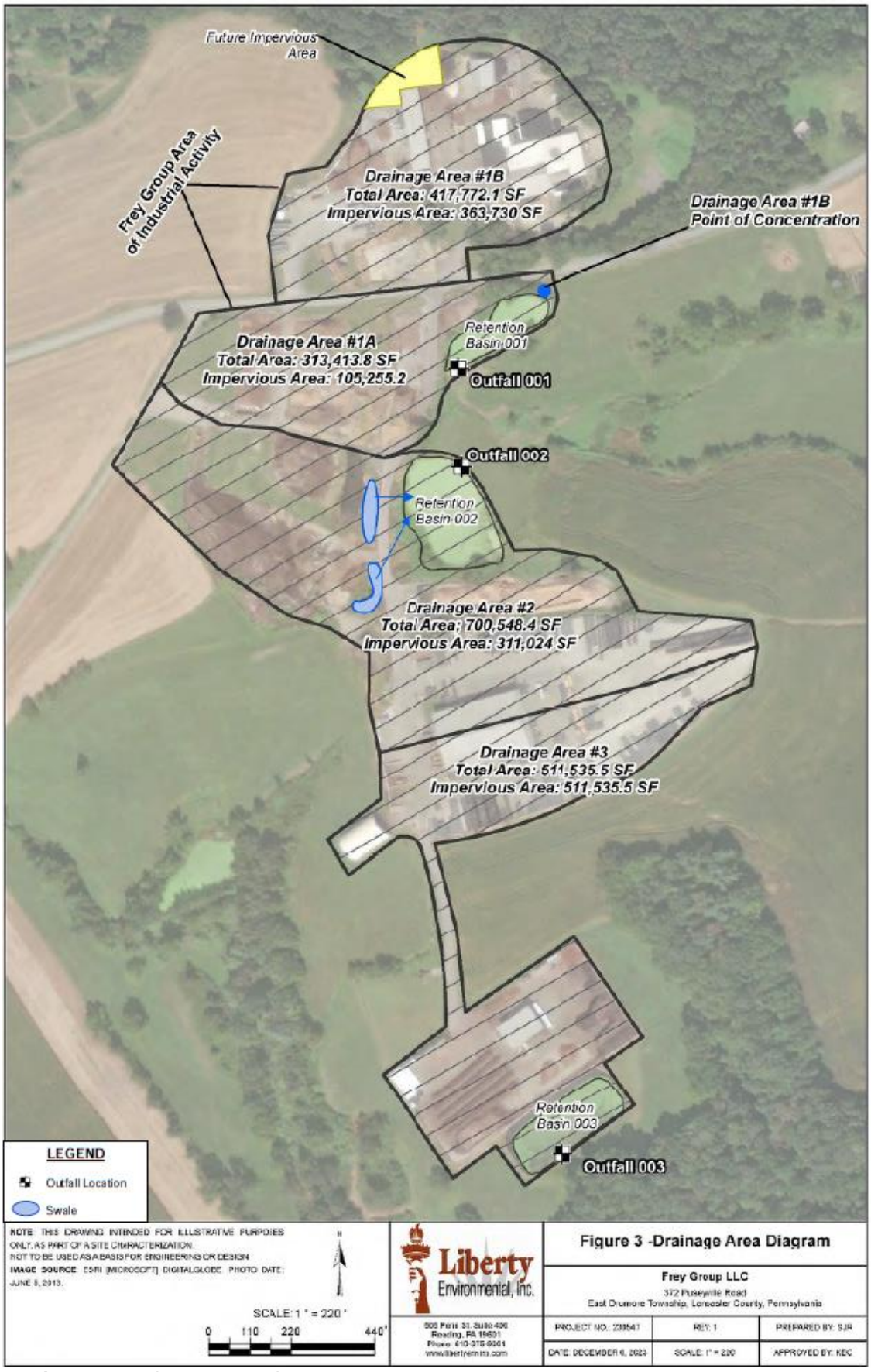

Figure 2. Drainage Area Diagram