

Application Type Renewal
Facility Type Storm Water
Major / Minor Minor

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

Application No. PAS232213
APS ID 793879
Authorization ID 1438838

Applicant and Facility Information

Applicant Name	<u>Royal Chemical C. Ltd</u>	Facility Name	<u>Royal Chemical C. Ltd Plant</u>
Applicant Address	<u>1336 Crowe Road</u> <u>East Stroudsburg, PA 18301-1105</u>	Facility Address	<u>1336 Crowe Road</u> <u>East Stroudsburg, PA 18301-1105</u>
Applicant Contact	<u>Saurabh Patel, Director of Engineering and EHS</u>	Facility Contact	<u>Mark Rogers, Director of Operations</u>
Applicant Phone	<u>(330) 467-6068</u>	Facility Phone	<u>(570) 421-7850</u>
Client ID	<u>253547</u>	Site ID	<u>237056</u>
SIC Code	<u>2841</u>	Municipality	<u>Stroud Township</u>
SIC Description	<u>Manufacturing - Soap and Other Detergents</u>	County	<u>Monroe</u>
Date Application Received	<u>May 5, 2023</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>May 24, 2023</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>Renewal of NPDES permit for discharge of industrial stormwater.</u>		

Summary of Review

The applicant is requesting a renewal of their NPDES permit to discharge stormwater associated with industrial activity to Brodhead Creek, a HQ-CWF, MF (High Quality-Cold Water Fishes, Migratory Fishes) designated receiving stream in state water plan basin 1-E (Brodhead Creek). As per the Department's current existing use list, the receiving stream segment does not have an existing use classification that is more protective than its designated use.

Royal Chemical C. Ltd (Royal Chemical) blends raw materials into various industrial and institutional cleaning products including laundry detergent, car washing detergents, janitorial and household cleaners, and disinfectants, sanitizers, and biocides. Operations at the manufacturing building include liquid blending and packaging ranging in size from four ounces to railcars.

The Royal Chemical facility consists of 43.6-acres, which contains 15.6 acres of developed land. This includes a 140,387 square foot manufacturing building, a 4,000 square foot loading/unloading building, a 650 square foot maintenance garage, small guard house, and small building which was a former fire pump house. There is concrete and asphalt parking/driveways areas and several grassy areas around the buildings. Outside the manufacturing building there is a trash compactor, full and empty drums stored in trailers, full and empty totes stored in trailers or temporarily on the ground surface, wood pallets and empty totes stored under a pavilion, dumpsters, three empty silos, truck unloading area, and a diesel aboveground storage tank.

Outside the loading/unloading building are three storage tanks and open basins used for pretreatment of process and rinse water. Once treated, the wastewater is pumped to a tanker truck and transported for treatment at the Lehigh County Authority Wastewater Treatment Plant (permitted under a special waste generator permit).

Approve	Deny	Signatures	Date
X		/s/ Allison S. Zukosky / Project Manager	May 28, 2024
X		/s/ Amy M. Bellanca, P.E. / Program Manager	5-31-24

Summary of Review

Storm drains are located in the driveway and grass areas north, northwest, south, and southwest of the manufacturing building. Stormwater that falls on grass and paved areas on the north side of the facility flows to the north and northwest storm drains that ultimately discharge to Outfall 001, located near the northwest corner of the employee parking lot. The stormwater from Outfall 001 flows south through the swale located along the west side of the facility to the swale located on the southwest portion of the facility.

Stormwater that falls on grass and paved areas on the south side of the facility flows to the south and southwest storm drains and flows to Outfall 002, located in the swale at the southwest portion of the facility. Stormwater in the swale, which includes the flow from Outfall 001, flows west to Brodhead Creek.

The facility is categorized by SIC code 2841 (Manufacturing - Soap and Other Detergents) and falls under Appendix F monitoring requirements of the renewed PAG-03 permit. Semi-annual monitoring/reporting is required for Total Nitrogen, Total Phosphorus, pH, Chemical Oxygen Demand (COD), Total Suspended Solids (TSS), Nitrate + Nitrite-Nitrogen, Total Lead, Total Zinc, Total Iron, and Total Aluminum.

Benchmark values exist for pH, COD, TSS, and Nitrate + Nitrite-Nitrogen. A benchmark value is the concentration of a pollutant in stormwater discharges that serves as a threshold for the determination of whether existing site BMPs are effective in controlling stormwater pollution. Benchmark values are not effluent limitations, and exceedances do not constitute permit violations. The benchmark values can be found in Part C. III. F. of the permit. A corrective action plan must be submitted to DEP if the discharge concentration for the parameters exceed the benchmark values for two or more consecutive monitoring periods.

PPC Plan implementation and completion of an annual inspection and compliance evaluation are required under the permit.

A Water Management System Inspection query indicated on October 18, 2023 a Routine/Partial Inspection was performed.

The previously issued permit expired on March 31, 2023. The renewal application was not received until May 5, 2023.

There are currently two open violations for this client that may need to be resolved before issuance of the final permit:

1. 02/15/2023 - Violation ID 985607 – Violation Code 92A.41(A)12B – Failure submit monitoring report(s) or properly complete monitoring reports. (WPC NPDES - Program Specific ID: PAS232213).
2. 02/15/2023 - Violation ID 985608 – Violation Code 92A.75(A) – Failure to submit NPDES renewal application at least 180 days prior to expiration or later approved date. (WPC NPDES - Program Specific ID: PAS232213).

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.

DRAFT