

Application Type Renewal  
 Facility Type Storm Water  
 Major / Minor Minor

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

Application No. PAS802204  
 APS ID 849202  
 Authorization ID 1506477

**Applicant and Facility Information**

Applicant Name	<u>Lehigh &amp; Northampton Transportation Authority</u>	Facility Name	<u>Lehigh &amp; Northampton Transportation Authority – Allentown Facility</u>
Applicant Address	<u>1060 Lehigh Street</u> <u>Allentown, PA 18103-3130</u>	Facility Address	<u>1060 Lehigh Street</u> <u>Allentown, PA 18103-3130</u>
Applicant Contact	<u>Brendan Cotter, Sr. Director of Service Support &amp; Planning</u>	Facility Contact	<u>Brendan Cotter, Sr. Director of Service Support &amp; Planning</u>
Applicant Phone	<u>(484) 633-3621</u>	Facility Phone	<u>(484) 633-3621</u>
Client ID	<u>92793</u>	Site ID	<u>535445</u>
SIC Code	<u>4111,4131,4173</u> <u>Trans. &amp; Utilities - Bus Terminal and Service Facilities.</u> <u>Trans. &amp; Utilities - Intercity and Rural Bus Transportation.</u> <u>Trans. &amp; Utilities - Local and Suburban Transit.</u>	Municipality	<u>Allentown City</u>
SIC Description		County	<u>Lehigh</u>
Date Application Received	<u>October 31, 2024</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>November 19, 2024</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>Renewal of NPDES permit to discharge industrial stormwater.</u>		

**Summary of Review**

The applicant is requesting renewal of an existing NPDES permit to discharge stormwater associated with industrial activity to Little Lehigh Creek, a HQ-CWF, MF (High Quality-Cold Water Fishes, Migratory Fishes) designated receiving stream in state water plan basin 2-C (Lower Lehigh River). 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. This stream segment is designated as a naturally reproducing trout stream as per PA Fish & Boat Commission. This discharge is not expected to affect public water supplies.

The Little Lehigh Creek is listed as Impaired for both Recreation (Source: Unknown, Cause: Pathogens) and Aquatic Life (Source: Urban Runoff/Storm Sewers, Cause: Siltation).

The Allentown Facility operations include ticket sales, bus inspections, maintenance, repairs, and bus storage. There are 65 buses that operate out of the substation. All activities (including maintenance/repair work, bus storage, and the fueling) occur within the building. All floor drainage is conveyed to an oil/water separator, then through a sand bed, and to the public sanitary sewer. The site also has four underground storage tanks.

The PPC Plan indicates there are no stormwater management treatment facilities or best management practices (BMPs) installed at the Allentown Facility besides a water quality snout installed in an inlet just outside of the southwest entrance to the maintenance garage.

Approve	Deny	Signatures	Date
X		<i>Allison Seyfried Zukosky</i> Allison Seyfried Zukosky / Project Manager	March 12, 2026
X		<i>Edward Dudick</i> Edward Dudick, P.E. / Environmental Engineer Manager	March 18, 2026

### Summary of Review

There are 11 stormwater inlets, 4 manholes, and two outfalls at the facility. Both outfalls discharge to a storm sewer owned/operated by the City of Allentown. Sampling is conducted in two separate inlets that receive stormwater before it leaves the site.

The previous permit indicated the facility is categorized by three SIC codes 4111, 4131, and 4173 (Trans. & Utilities - Bus Terminal and Service Facilities, Intercity and Rural Bus Transportation, and Local and Suburban Transit). The renewal application indicates the facility is categorized under SIC codes 4179, 4131, and 4111; however, 4179 is not a standard SIC code. The facility falls under Appendix L monitoring requirements of the PAG-03 General Permit. The Department renewed the NPDES General Permit for Stormwater Discharges Associated with Industrial Activity (PAG-03) and it became effective on March 24, 2023. Therefore, the new monitoring requirements for Appendix L will be utilized in this permit renewal. Semi-annual monitoring and reporting for Total Suspended Solids (TSS), Oil & Grease, Total Nitrogen, and Total Phosphorous are required under this permit.

Benchmark values exist for TSS and Oil & Grease. 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. 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. The current PPC Plan was requested to be provided for review on January 14, 2026. The Permittee's consultant responded on January 23, 2026 informing the Department that the PPC Plan was being tracked down because their former wastewater engineer was likely the people whole authored the plan. The PPC Plan was not provided to the Department until March 11, 2026. The permittee and consultant were reminded via email that the PPC Plan should be readily available at the facility and should be updated on an annual basis, at a minimum. It appears the date on the cover of the provided PPC plan is 2014. The delay in providing the PPC Plan is noted.

The existing permit expired on April 30, 2025 and the application for renewal was received on time.

A Water Management System Inspection query indicated that on February 27, 2024 a Routine/Partial Inspection was performed.

There are currently no open violations for this client that warrant withholding issuance of the permit.

#### 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.

