pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST REGIONAL OFFICE
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PAS802227**
Facility Type	**Storm Water**	APS ID	**761262**
Major / Minor	**Minor**	Authorization ID	**1389281**

NPDES PERMIT FACT SHEET ADDENDUM

Applicant and Facility Information

Applicant Name	**Dayton Superior Corp**	Facility Name	**Dayton Superior Corp Allentown Distribution Center**
Applicant Address	1125 Byers Road Miamisburg, OH 45342-5765	Facility Address	7130 Ambassador Drive Allentown, PA 18106-9254
Applicant Contact	Amy Morissette	Facility Contact	Troy Heiland
Applicant Phone	(937) 866-0711	Facility Phone	(610) 366-3890
Client ID	290470	Site ID	753358
SIC Code	4225	Municipality	Upper Macungie Township
SIC Description	Trans. & Utilities - General Warehousing And Storage	County	Lehigh
Date Published in PA Bulletin	TBD for Redraft Permit	EPA Waived?	Yes
Comment Period End Date	TBD for Redraft	If No, Reason	-

Purpose of Application: Application for a renewal of an NPDES permit for discharge of treated Storm Water

Internal Review and Recommendations

This Redraft Individual IW Stormwater NPDES Permit has been issued for public comment. The facility discharges IW Stormwater to Iron Run (HQ-CWF; Stream Code No. 3594) via a storm sewer system:

- Per original 2011 IRR: The unnamed tributary consists of a series of storm water pipes and channels that convey flow approximately 3.0 miles from the facility's stormwater outfalls to Iron Run. The facility includes three stormwater outfalls: Outfalls 001 (employee parking area), 002 (truck shipping/loading area) and 003 (delivery and brace storage area). Measures are described in the application and PPC Plan to minimize exposure to stormwater. A grass swale associated with Outfall 003 acts as a biofilter for particulates and oil and grease. The application notes the potential to discharge deicing salt (sodium chloride) from winter deicing activities and drippage from vehicles. Since this activity/discharge is seasonal/intermittent and BMPs are in place to minimize the discharge of pollutants, the facility would not fall under the TDS requirements of §95.10.
- From 2017 IRR: Stormwater discharges from all three site outfalls enter the Mill Road drainage ditch before traveling through above/underground stormwater channels and eventually entering Iron Run a few hundred feet to the south of State Route 222.

Other non-IW stormwater at facility: None identified in application.

Approved non-stormwater discharges expected to occur (must meet all requirements in Part C.I.B): No sector-specific non-stormwater discharges are authorized except for below (listed as potentially present in the site PPC Plan, and therefore may be expected onsite).

- Discharges from emergency/unplanned fire-fighting activities
- Potable water

Approve	Return	Deny	Signatures	Date
X			James D. Berger (signed) James D. Berger, P.E. / Environmental Engineer	April 25, 2023
X			Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Program Manager	5-3-23

Internal Review and Recommendations

- Uncontaminated condensate from air conditioners, coolers/chillers, and other compressors
- Irrigation drainage
- Landscape water that does not contain pesticides, herbicides or fertilizer
- Pavement wash waters, other than wash waters used on newly sealed pavement
- Routine external building washdown / power wash water that does not contain detergents or hazardous cleaning products
- Uncontaminated ground water or spring water
- Foundation or footing drains where flows are not contaminated with process materials
- Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of a facility

The receiving stream is impaired and/or has an approved TMDL: Yes. Iron Run (HQ-CWF) is impaired by: Urban Runoff/Storm Sewers - flow regime modification; Urban Runoff/storm sewers – siltation. The nature of the impairments were addressed by the application sampling and permit requirements for TSS, not requiring additional sampling. No existing watershed TMDL.

The discharge is not expected to cause or contribute to the impairment: The facility's implemented stormwater BMPs, PPC Plan and monitoring will prevent any negative impacts on the receiving stream.

Antidegradation: The existing facility (in an industrial area per E-maps) is not expected to result in any new, additional, increased negative impact on the receiving HQ-CWF stream. The facility's stormwater BMPs, PPC Plan and monitoring (with permit limits/benchmarks) should prevent any negative impacts on the receiving stream. No Antidegradation Module was included in application, but no activity that would result in new, additional, or increased loadings was identified in the application. In addition:

- EDMR data (see table below) shows no exceedances of the applicable benchmarks, indicating overall compliance with IW Stormwater requirements.
- Application data did not show any exceedance of the PAG-03 benchmarks for BOD5 (14.3 mg/l max), COD (33.0 mg/l max), pH (8.14 SU max) benchmarks.
- Application data did not show significant TN (1.4 mg/l max) or TP (0.14 mg/l max) levels.
- Application and PPC Plan indicates no significant leaks or spills in the last five (5) years outside of the building (i.e. secondary containment).
- Part A.III.C.2 (Planned Changes to Physical Facilities) identifies types of facility changes requiring prior notification to the Department. The Department would determine if permitting is required upon receipt of written notification, taking Antidegradation considerations into account.

Other Comments:

- Changes to Updated NPDES Permit:
  - Change in Applicable PAG-03 Appendix Coverage: The Department has determined the facility needs to meet the minimum statewide IW Stormwater General Permit PAG-03 Appendix L requirements, not Appendix N (per previous Draft NPDES Permit).
    - Per the Application: The facility is a "masonry material merchant wholesaler" (NAICS Code No. 423320) warehouse with limited outside storage for metal braces and shoring equipment outdoors to the west of the building, plus a waste dumpster in the same area. It is identified as a leased distribution center for construction industry companies per the General Information Form.
    - The site PPC Plan indicated this facility is a SIC 4225 facility, which fall under the PAG-03 Appendix L stormwater BMP requirements, not under Appendix N.
      - PAG-03 Appendix L (LAND TRANSPORTATION AND PETROLEUM STATIONS AND TERMINALS) applies to SIC Code 4225.
      - PAG-03 Appendix N (GLASS, CLAY, CEMENT, CONCRETE AND GYPSUM PRODUCTS) applies to different SIC Codes for facilities which produce these types of products (with different "indicator" parameters monitoring requirements and stormwater BMPs).
    - NPDES Template Changes: The IW Stormwater NPDES Permit Standard conditions have updated to most recent template (February 2023).
  - pH limits: Chapter 95.2 limits have been added due to discharge to a HQ watershed, in the absence of Part C Appendix L benchmark.

Internal Review and Recommendations

  - TN and TP Monitoring: Additional minimum statewide PAG-03 Appendix L Parameters (Total Nitrogen = Total Kjehldahl Nitrogen + Nitrate-Nitrite-N measured in same sample; Total Phosphorus) monitoring been added per current IW Stormwater monitoring requirements.
- Facility: Overall site described as 274,864 SF area (64.3% impervious). Three existing stormwater outfalls/drainage areas:
  - Outfall No. 001: 87,210 SF (25% impervious) including employee parking lot
  - Outfall No. 002: 39,204 SF (100% impervious) including loading dock/truck driving area
  - Outfall No. 003: 87,120 SF (19% impervious) including outdoor brace and shoring storage, waste dumpster
- Receiving Storm Sewer System: The application was unclear about the receiving storm sewer system. UPPER MACUNGIE TWP LEHIGH CNTY MS4 NPDES No. PAI132205 may apply to the area. The permittee is cautioned that it must contact the Township to determine if the stormwater discharges to the MS4 System, If so, then additional Annual IW Stormwater Report submittal obligations (to the MS4 permittee) would apply.
- Compliance History:
  - 2/24/2022 DEP NOV indicated late application. Application was received 3/15/2022. NOV also cited failure to collect samples for July – December 2021 and failure to submit 2018 Annual IW Stormwater Inspection Report.
  - Six (6) open violations per 4/25/2023 WMS Query (Open Violation by Client Number):

PROGRAM SPECIFIC ID	INSP ID	VIOLATION ID	VIOLATION DATE	VIOLATION CODE	VIOLATION
PAR202232	3477527	979572	12/22/2022	92A.41(A)12B	NPDES - Failure to submit monitoring report(s) c properly complete monitoring reports
PAR202232	3477527	979573	12/22/2022	92A.41(A)8	NPDES - Failure to provide information or recor required by the permit or otherwise needed to determine compliance
PAR202232	3477527	979574	12/22/2022	92A.61(C)	NPDES - Failure to monitor pollutants as require by the NPDES permit
PAS802227	3333178	947804	02/24/2022	92A.75(A)	NPDES - Failure to submit NPDES renewal application at least 180 days prior to expiration c later approved date
PAS802227	3333178	947806	02/24/2022	92A.44	NPDES - Violation of effluent limits in Part A of permit
PAS802227	3333178	947807	02/24/2022	92A.41(A)12B	NPDES - Failure to submit monitoring report(s) c properly complete monitoring reports

EDMR Data Summary:

MONITORING START DATE	OUTFALL	DISCHARGE	PARAMETER	CONC UNITS	CONC 3 VALUE
01/01/2017	001	Yes	Oil and Grease	mg/L	< 4.2
01/01/2017	002	Yes	Oil and Grease	mg/L	< 4.2
01/01/2017	003	Yes	Oil and Grease	mg/L	< 4.2
07/01/2017	001	Yes	Oil and Grease	mg/L	2.2
07/01/2017	002	Yes	Oil and Grease	mg/L	2.0
07/01/2017	003	Yes	Oil and Grease	mg/L	2.0
01/01/2018	001	Yes	Oil and Grease	mg/L	2.1
01/01/2018	002	Yes	Oil and Grease	mg/L	2.1

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01/01/2018	003	Yes	Oil and Grease	mg/L	2.1
07/01/2018	001	Yes	Oil and Grease	mg/L	1.4
07/01/2018	002	Yes	Oil and Grease	mg/L	1.5
07/01/2018	003	Yes	Oil and Grease	mg/L	1.9
01/01/2019	001	Yes	Oil and Grease	mg/L	1.6
01/01/2019	002	Yes	Oil and Grease	mg/L	1.6
01/01/2019	003	Yes	Oil and Grease	mg/L	1.4
07/01/2019	001	Yes	Oil and Grease	mg/L	< 3.9
07/01/2019	002	Yes	Oil and Grease	mg/L	< 3.8
07/01/2019	003	Yes	Oil and Grease	mg/L	< 3.9
01/01/2020	001	Yes	Oil and Grease	mg/L	< 0.1
01/01/2020	002	Yes	Oil and Grease	mg/L	2.8
01/01/2020	003	Yes	Oil and Grease	mg/L	< 0.1
07/01/2020	001	Yes	Oil and Grease	mg/L	< 4.2
07/01/2020	002	Yes	Oil and Grease	mg/L	< 4.1
07/01/2020	003	Yes	Oil and Grease	mg/L	< 4.5
01/01/2021	001	Yes	Oil and Grease	mg/L	< 4.3
01/01/2021	002	Yes	Oil and Grease	mg/L	< 4.0
01/01/2021	003	Yes	Oil and Grease	mg/L	< 4.4
07/01/2021	001	Yes	Oil and Grease	mg/L	E
07/01/2021	002	Yes	Oil and Grease	mg/L	E
07/01/2021	003	Yes	Oil and Grease	mg/L	E
01/01/2022	001	Yes	Oil and Grease	mg/L	< 5.4
01/01/2022	002	Yes	Oil and Grease	mg/L	< 4.3
01/01/2022	003	Yes	Oil and Grease	mg/L	< 4.3
07/01/2022	001	Yes	Oil and Grease	mg/L	< 4.2
07/01/2022	002	Yes	Oil and Grease	mg/L	< 4.1
07/01/2022	003	Yes	Oil and Grease	mg/L	< 4.0
01/01/2017	001	Yes	Total Suspended Solids	mg/L	34
01/01/2017	002	Yes	Total Suspended Solids	mg/L	6.0
01/01/2017	003	Yes	Total Suspended Solids	mg/L	1.0
07/01/2017	001	Yes	Total Suspended Solids	mg/L	2.0
07/01/2017	002	Yes	Total Suspended Solids	mg/L	3.5
07/01/2017	003	Yes	Total Suspended Solids	mg/L	23.2
01/01/2018	001	Yes	Total Suspended Solids	mg/L	43.4
01/01/2018	002	Yes	Total Suspended Solids	mg/L	2.7
01/01/2018	003	Yes	Total Suspended Solids	mg/L	1.2
07/01/2018	001	Yes	Total Suspended Solids	mg/L	3.9
07/01/2018	002	Yes	Total Suspended Solids	mg/L	1.3
07/01/2018	003	Yes	Total Suspended Solids	mg/L	2.5
01/01/2019	001	Yes	Total Suspended Solids	mg/L	18.9
01/01/2019	002	Yes	Total Suspended Solids	mg/L	9.1

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01/01/2019	003	Yes	Total Suspended Solids	mg/L	21.3
07/01/2019	001	Yes	Total Suspended Solids	mg/L	< 5.0
07/01/2019	002	Yes	Total Suspended Solids	mg/L	< 5.0
07/01/2019	003	Yes	Total Suspended Solids	mg/L	< 5.0
01/01/2020	001	Yes	Total Suspended Solids	mg/L	< 0.1
01/01/2020	002	Yes	Total Suspended Solids	mg/L	< 0.1
01/01/2020	003	Yes	Total Suspended Solids	mg/L	< 0.1
07/01/2020	001	Yes	Total Suspended Solids	mg/L	< 5
07/01/2020	002	Yes	Total Suspended Solids	mg/L	< 5
07/01/2020	003	Yes	Total Suspended Solids	mg/L	8
01/01/2021	001	Yes	Total Suspended Solids	mg/L	< 5.0
01/01/2021	002	Yes	Total Suspended Solids	mg/L	< 5.0
01/01/2021	003	Yes	Total Suspended Solids	mg/L	< 5.0
07/01/2021	001	Yes	Total Suspended Solids	mg/L	E
07/01/2021	002	Yes	Total Suspended Solids	mg/L	E
07/01/2021	003	Yes	Total Suspended Solids	mg/L	E
01/01/2022	001	Yes	Total Suspended Solids	mg/L	28
01/01/2022	002	Yes	Total Suspended Solids	mg/L	10
01/01/2022	003	Yes	Total Suspended Solids	mg/L	17
07/01/2022	001	Yes	Total Suspended Solids	mg/L	< 5.0
07/01/2022	002	Yes	Total Suspended Solids	mg/L	< 5.0
07/01/2022	003	Yes	Total Suspended Solids	mg/L	8.0