

Application Type New  
Facility Type Storm Water  
Major / Minor Minor

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

Application No. PA0276511  
APS ID 1052538  
Authorization ID 1377729

**Applicant and Facility Information**

Applicant Name	<u>The Espoma Company</u>	Facility Name	<u>Espoma - Hegins</u>
Applicant Address	<u>6 Espoma Road</u> <u>Millville, NJ 08332</u>	Facility Address	<u>Route 25</u> <u>Hegins, PA 17938</u>
Applicant Contact	<u>Jeremy Brunner</u>	Facility Contact	<u>Mike Ferguson</u>
Applicant Phone	<u>(856) 825-0542</u>	Facility Phone	<u>(417) 838-3233</u>
Client ID	<u>354840</u>	Site ID	<u>850332</u>
SIC Code	<u>2875</u>	Municipality	<u>Frailey Township</u>
SIC Description	<u>Manufacturing - Fertilizers, Mixing Only</u>	County	<u>Schuylkill</u>
Date Application Received	<u>November 29, 2021</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>November 29, 2021</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>New NPDES permit for discharge of industrial stormwater.</u>		

**Summary of Review**

The applicant is requesting a new NPDES individual permit to discharge stormwater associated with industrial activity to Gebhard Run, a CWF/MF receiving stream in state water plan basin 07-D (Swatara Creek). As per the Department's current existing use list, the receiving stream does not have an existing use classification that is more protective than its designated use.

The Espoma Company proposes to construct an organic fertilizer granulation process facility located along Route 25 (Shermans Mountain Road) adjacent to the existing Keystone Potato Products facility in Frailey Township, Schuylkill County. The proposed facility will utilize physical conversion technology designed to granulize cage layer poultry manure with bone meal and feather meal additives to create an organic fertilizer. The proposed Espoma facility has been designed to process up to 400 tons per day (tpd), or a maximum of 40,000 tons per year (tpy), of raw material.

Process operations will be conducted within the proposed enclosed building. Two finished product silos are located indoors, and one loadout silo is located outdoors. Loading of finished product to the loadout silo will occur via bucket elevators through a connection inside the building. Unloading of finished product from the loadout silo is completed by loading outbound trucks using an automated process. In a letter dated February 11, 2022, the applicant's consultant stated: "The loadout process is partly under cover. The truck /trailer will gradually pull forward as the trailer receives material being loaded. As the back third of the trailer finishes load out, the front two - thirds of the trailer will be out from under the load out cover before the load is completed. If a spill would occur during the loadout process, the spilled material would be contained to the scale deck and would be cleaned up with front loader brooms and shovels. Water that contacts the product will be managed separately (processed with product or removed from the site), and will not be discharged to the surface water drainage features."

Approve	Deny	Signatures	Date
X		<i>Brian Burden</i> Brian Burden, E.I.T. / Project Manager	February 15, 2021
X		Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Environmental Engineer Manager	3-3-22

### Summary of Review

All outbound vehicles carrying finished product will be covered with water-proof tarps before leaving the site. No process wastewater is generated by the process. Sanitary wastewater is separate and handled by an on-lot system. The facility will not have floor drains.

Stormwater runoff from the site will be collected in vegetated swales and directed to an onsite infiltration basin. Stormwater collected in the roof drains of the facility building will also be conveyed to the infiltration basin. GIS mapping of the area indicates there are no karst geological features present that would be of concern for the infiltrated water. The infiltration basin will discharge to Gebhard Run via Outfall 001. Outfall 001 discharges into an existing 18" HDPE non-MS4 conveyance before reaching Gebhard Run. Runoff from wooded areas, grass areas and roadways not associated with industrial activities will be discharged through an existing culvert passing under Route 25.

The facility is primarily categorized by SIC code 2875 (Manufacturing - Fertilizers, Mixing Only) and falls under Appendix F monitoring requirements of the PAG-03 general permit. Appendix F pollutants of concern include: pH, COD, TSS, NO<sub>2</sub>+NO<sub>3</sub>-N, Total Phosphorus, Total Lead, Total Zinc, Total Iron and Total Aluminum. Semiannual monitoring/reporting for Fecal Coliform is also added to Part A of the permit for Outfall 001 with the standard summertime limitations as a manure constituent/indicator for release in the stormwater drainage areas. pH shall be within the range of 6.0 S.U. – 9.0 S.U.

Appendix F includes benchmark values for COD and TSS. Oil & Grease is a parameter of concern for this site and the standard PAG-03 benchmark value is included in the permit for this parameter. 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. In the event that stormwater discharge concentrations for a parameter exceeds the benchmark value at same outfall for two or more consecutive monitoring periods, the permittee shall develop a corrective action plan to reduce the concentrations of the parameters in stormwater discharges.

Design considerations from PA DEP's Stormwater BMP Manual (doc. No. 363-0300-002) recommends including measures to reduce sediment when stormwater runoff is directed from roadway areas to the infiltration basin. These measure help to maintain the infiltration capacity of the BMP. An internal monitoring point (IMP 101) is added to the permit at the inlet identified as "Inlet #1" on the proposed site drawings submitted by the permittee. For clarification, Inlet #1 will be located immediately downgrade (slightly northeast) of the proposed In & Out Trade Scale (see IMP 101 Location attachment). Total Suspended Solids and Oil & Grease are to be monitored "Upon Request" from DEP at IMP 101. IMP coordinates entered into eFACTS for the subfacility were approximated.

Part C permit conditions require semiannual site inspections as well as implementation of BMPs and implementation of the facility PPC plan. There are no open violations for the client that would warrant withholding the issuance of this permit. EPA waiver is in effect.

Two comments were submitted to DEP regarding the newspaper notice of the permit application:

**From William C. Reiley:**

*"In my capacity as solicitor to the Board of Supervisors of Reilly Township, Schuylkill County, I have been requested to obtain a complete copy of the application and any supporting documentation regarding the NPDES Individual permit of The Espoma Company located along Route 25/Sherman's Mountain Road, Hegins, Schuylkill County, to discharge industrial stormwater from the chicken manure facility into any existing waterway or the water table.*

*During the zoning process, Reilly Township sought to have the trucks and trailers hauling the chicken manure to the site to be washed by water and that wastewater collected so it would not flow onto the surrounding lands. Ultimately that request was not made part of the zoning approval, hence the concern of our Township, especially regarding runoff in excess of the design infiltration rate.*

*Many thanks for your consideration of this real concern and we are grateful for receiving a copy of the documents."*

**DEP Response:**

The application materials were uploaded to the Department's website for public access and a hyperlink was provided to the commenter via email on December 16, 2021. Provisions were added to the permit to help ensure long-term effectiveness of the infiltration basin BMP; all trucks transporting materials to the site are to be cleaned using dry cleaning methods inside the building.

### Summary of Review

#### From Caller on 12/10/2021 (summarized):

*The caller stated he as well as the township had concerns about the stormwater runoff from the site. The caller indicated there was originally plans to put trailer clean offs for their chicken manure on their trailers but then that provision was eventually removed and resolved by the local government. After learning of the proposed stormwater discharge the caller indicated he may utilize a sediment dam. The caller has concerns about bacteria and parasites coming off the trailers when they're outside the building and there are concerns about the stormwater runoff entering existing waterways, groundwater systems, and the town in general.*

#### DEP Response:

Provisions have been added to the permit to help ensure long-term effectiveness of the site BMPs. Documentation submitted with the NPDES stormwater permit application indicates that all industrial activities will take place indoors and under cover, with the exception of loading trucks from the loadout silo under partial cover. All trucks transporting materials to the site are to be cleaned using dry cleaning methods inside the building. If considering installing a sediment dam then the caller shall be sure to obtain any necessary permits/authorizations for that project.



IMP 101  
Location.pdf

#### 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.