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DOCKET NO. D-1970-120-5

DELAWARE RIVER BASIN COMMISSION

**Cambridge-Lee Industries, LLC
Industrial Process and Non-Contact Cooling Water Discharge
Ontelaunee Township, Berks County, Pennsylvania**

PROCEEDINGS

This docket is issued in response to an application submitted to the Delaware River Basin Commission (DRBC or Commission) on March 25, 2026 (Application), to renew the approval of the docket holder's existing industrial process water and non-contact cooling water discharges. The Pennsylvania Department of Environmental Protection (PADEP) issued National Pollutant Discharge Elimination System (NPDES) Permit No. PA0034304 for this discharge.

The application was reviewed for approval under Section 3.8 of the *Delaware River Basin Compact*. The Berks County Planning Commission has been notified of pending action. A public hearing on this project was held by the DRBC on August 5, 2026.

A. DESCRIPTION

1. Purpose. The purpose of this docket is to renew the approval of existing industrial process water discharges and non-contact cooling water from the docket holder's copper pipe manufacturing facility. The facility will continue to discharge 0.0155 million gallons per day (mgd) of cooling tower blowdown and pretreatment system backwash via Outfall No. 001, and 0.929 mgd of cooling tower blowdown and NCCW via Outfall No. 002. This docket also continues a total dissolved solids (TDS) determination for Outfall No. 001 consisting of an average monthly effluent limit of 15,200 mg/l.

2. Location. The Cambridge Lee facility is located on Tube Drive, off Pottsville Pike (US Route 61), in Ontelaunee Township, Berks County, Pennsylvania. The facility will continue to discharge industrial wastewater from two outfalls (Outfall Nos. 001 & 002) to the Schuylkill River

at approximately River Mile 92.47 – 86.5 (Delaware River – Schuylkill River). Outfall No. 001 is approximately 1,000 feet upstream from Outfall No. 002.

The locations of the outfalls in the Schuylkill River Watershed are as follows:

OUTFALL NO.	LATITUDE (N)	LONGITUDE (W)
001	40° 25' 18"	75° 56' 55"
002	40° 25' 02"	75° 56' 46"

3. **Area Served.** The docket holder's facility will continue to discharge industrial process water generated on-site by their copper tube manufacturing and processing activities in Plant Nos. 2, 3, and 4, and the Eagle Plant located in Ontelaunee Township, Berks County, Pennsylvania. For the purpose of defining the Area Served, the Type of Discharge and the Service Area sections from the docket holder's Application are incorporated herein by reference, to the extent consistent with all other conditions contained in Section C. DECISION of this docket.

4. **Design Criteria.** The docket holder discharges NCCW, cooling tower blowdown and industrial wastewater pre-treatment system backwash from their copper piping manufacturing Plant Nos. 2, 3, 4 and the Eagle Plant, whose operations include molten copper refining, copper log casting, copper billet production, and copper tube production. The Eagle Plant is currently inactive, but operations are expected to resume in the future. NCCW and cooling tower blowdown is discharged from Plant No. 2 operations at Outfall No. 002 at an average discharge rate of 0.884 mgd. Cooling tower blowdown from the Eagle Plant and pre-treatment system backwash from Plant No. 4 operations is batch discharged at Outfall No. 001 at an average discharge rate of 0.008 mgd.

Sanitary wastewater, rinse bath process wastewater and cooling tower blowdown from Plant Nos. 3 and 4 are discharged to the OTMA sewer system for conveyance to the Leesport Borough Authority (LBA) WWTP for treatment and discharge to the Schuylkill River. The LBA WWTP was approved by the DRBC via Docket No. D-2001-21 CP on December 18, 2001.

5. **Facilities.** The existing facilities and water uses/discharges are described as follows:

Plant Nos. 2 & 3:

Plant Nos. 2 and 3 are supplied with cooling tower make-up water, NCCW, and industrial process water from Reading Area Water Authority (RAWA) and one (1) surface water intake located on the Schuylkill River, owned and operated by the docket holder. Plant No. 2 includes a bailing press and billet saw each discharging approximately 0.029 mgd of NCCW, several furnaces discharging a total of approximately 0.819 mgd of NCCW, a casting machine that evaporates 0.071 mgd (no discharge), and two (2) cooling towers that combined evaporate approximately 0.234 mgd, and discharge approximately 0.001 mgd of blowdown. All discharges from Plant No. 2 are to Outfall No. 002.

Plant No. 3 includes a quench water tank that evaporates approximately 0.06 mgd (no discharge), and a cooling tower that evaporates approximately 0.08275 mgd, and sends approximately 0.002 mgd of blowdown to the OTMA sewer system.

Plant Nos. 2 and 3 send sanitary wastewater generated at the plants to the OTMA sewer system for conveyance to the Leesport Borough Authority WWTP for treatment and discharge to the Schuylkill River. No modifications to the discharges from Plant Nos. 2 and 3 are proposed.

Plant No. 4 & Eagle Plant:

Plant No. 4 and the Eagle Plant are supplied with cooling tower make-up water from OTMA public water supply, which is pretreated before use in operations. The treatment process includes mixed media filter, water softening and reverse osmosis. Approximately 0.0045 mgd of water softener wastewater and media filter backwash and reverse osmosis reject water is discharged to Outfall No. 001. The Eagle Plant contains seven (7) cooling towers that evaporate 0.090 mgd and discharge approximately 0.0035 mgd to Outfall No. 001 when in operation.

Sanitary wastewater, rinse bath process wastewater and blowdown from three (3) cooling towers at Plant No. 4 are sent to the OTMA sewer system for conveyance to the Leesport Borough Authority WWTP for treatment and discharge to the Schuylkill River, along with sanitary wastewater generated at Plant No. 4.

Elevated effluent TDS discharge at Outfall No. 001 is the result of Plant No. 4 and Eagle Plant operations including backwashing the pre-treatment systems and blowing down recycled cooling water from the cooling towers. See the FINDINGS section for the TDS determination.

The project facilities are not located in the 100-year floodplain.

Wasted sludge will continue to be hauled off-site for disposal in accordance with the NPDES Permit No. PA0034304.

6. Water Withdrawals. Water for the project is supplied by a surface water intake located on the Schuylkill River, owned and operated by the docket holder. The surface water withdrawal is described in detail in DRBC Docket No. D-2012-025-2, which was approved by the DRBC on June 7, 2023. The docket holder also uses public water purchased from the Reading Area Water Authority (RAWA) and Ontelaunee Township Municipal Authority (OTMA). The RAWA water supply was most recently approved by the Commission by Docket No. D-2000-059 CP-3 on March 10, 2021. OTMA purchases water from RAWA and is served by the Borough of Leesport. The Borough of Leesport withdrawals are described in DRBC Docket No. D-2001-012 CP-3, which was approved by the DRBC on June 5, 2024.

7. NPDES Permit / DRBC Effluent Requirements. NPDES Permit No. PA0034304 issued by the PADEP includes final effluent limitations for the project discharge to surface waters classified by the PADEP as supporting Warm Water Fishes and migratory fishes (WWF, MF). EFFLUENT TABLES C-1 & C-2 included in Section C. DECISION condition C.1. of this docket,

contains effluent requirements for DRBC parameters that must be met as a condition of this approval. Effluent requirements for Outfall No. 001 and No. 002 are based on design flow rates of 0.015 mgd, 0.929 mgd, respectively.

B. FINDINGS

The docket holder applied to renew the approval of existing industrial process water discharges from their copper pipe manufacturing facility. The facility will continue to discharge 0.015 of cooling tower blowdown and pretreatment system backwash via Outfall No. 001, and 0.929 mgd of cooling tower blowdown and NCCW via Outfall No. 002. This docket also continues a TDS determination for Outfall No. 001 consisting of average monthly effluent limits of 15,200 mg/l.

1. TDS Effluent Limit Determination

Section 3.10.4.D.2 of the *Water Quality Regulations (WQR)* states:

“Total dissolved solids shall not exceed 1000 mg/l, or a concentration established by the Commission which is compatible with designated water uses and stream quality objectives, and recognizes the need for reserve capacity to serve future dischargers.”

The Commission’s basin-wide in-stream TDS criteria is that the receiving stream’s resultant TDS concentration be less than 133% of the background (*WQR* Section 3.10.3.B.1.b.) and the receiving stream’s resultant TDS concentration be less than 500 mg/l (*WQR* Section 3.10.3.B. 2.). The discharge is required to comply with the more stringent of the above in-stream criteria. The 133% of the background TDS requirement is for the protection of aquatic life. The 500 mg/l TDS requirement is to protect the use of the receiving stream as a drinking water source. The EPA’s Safe Drinking Water Act secondary standard for TDS is 500 mg/l.

High TDS discharging at Outfall No. 001 is the result of Plant No. 4 and the Eagle Plant operations; including backwashing the pre-treatment systems and blowing down recycled cooling water from the cooling towers. Plant No. 4 operations require relatively clean water for optimum performance and therefore supply water at Plant No. 4 is pre-treated by the mixed media filter, the reverse osmosis system, and the water softener system. The mixed media filter backwash and the reverse osmosis reject water contain concentrated TDS. Water used for cooling by the cooling towers is recycled and evaporated, creating concentrated TDS in the blowdown. A small amount of TDS is generated by the Plant No. 4 water softener system; however, most of the facility systems do not generate TDS, they only remove and concentrate TDS from the water used at the facility. Although the resultant wastewater streams are higher in TDS concentration than the TDS concentration in the supply water used in operations, the relative load of TDS being discharged at the facility is not much greater than the load in the supply water coming into the facility. Except for the small amount of TDS added from the water softener system, the TDS load into the plant equals the TDS load out of the plant. The docket holder requested renewal of the TDS effluent concentration limits of 15,200 mg/l for Outfall No. 001 and 1,000 mg/l for Outfall No. 002.

Using “Low-Flow Statistics for Pennsylvania Streams”, an internet tool developed by the USGS for the PADEP, the Q_{7-10} flow in the Schuylkill River is estimated as 155 cfs (100 mgd) at a location approximately 0.7 miles downstream of Outfall No. 002 (Cross Keys Bridge). DRBC staff considered this flow as the best representative of Q_{7-10} flow at the facility outfalls. DRBC estimates Schuylkill River in-stream TDS concentration based on available data compiled from two (2) sources: 1) the United States Geological Survey (USGS) National Water Information System (NWIS) and 2) the US EPA’s STORET database. Based on the available data, the estimated background TDS concentration in the Schuylkill River upstream of Outfall No. 001 is 370 mg/l. 133% of 370 mg/l is 492 mg/l; therefore, the DRBC in-stream requirement of 133% of background is the more stringent of the two (2) Commission in-stream requirements.

Based on the estimated background TDS concentration in the Schuylkill River of 370 mg/l, the Q_{7-10} flow of the Schuylkill River of 100 mgd, Outfall No. 001 discharging 0.0155 mgd at a TDS concentration of 15,200 mg/l, and Outfall No. 002 discharging 0.929 mgd at a TDS concentration of 1,000 mg/l, the TDS in the Schuylkill River would be raised to 378.1 mg/l during Q_{7-10} flows. If there was a discharge from the docket holder’s facility under these conditions, the facility’s discharges would raise background TDS to 102.2 %.

Although the Outfall No. 001 discharge exceeds DRBC’s basin-wide TDS effluent limit of 1,000 mg/l, DRBC staff determined the discharge to be compatible with the Commission’s designated water uses and water quality objectives in conformance with DRBC *Water Quality Regulations* since the in-stream concentrations in the Schuylkill River are not expected to exceed the US EPA’s Safe Drinking Water Act’s secondary standard for TDS is 500 mg/l nor exceed the Commission’s criteria of 133% of background as a result of the IWTP discharge. Therefore, the 15,200 mg/l effluent limit for Outfall 001 approved in Docket No. D-1970-120-3 is continued via this docket.

2. Other

Near the docket holder’s IWTP discharge, the Schuylkill River has an estimated seven-day low flow with a recurrence interval of ten years (Q_{7-10}) of 100 mgd (155 cfs). The ratio of this low flow to the average design process water discharge from the facility (0.9445 mgd) is 106 to 1.

The nearest surface water intake of record for public water supply is located on the Schuylkill River approximately 30 River Miles downstream of the docket holder’s discharge and is operated by the Borough of Pottstown.

The project as approved herein does not impair or conflict with the Comprehensive Plan.

The effluent limits in the NPDES Permit meet or exceed Commission effluent quality requirements where applicable.

The project is designed to produce a discharge that meets the effluent requirements as set forth in the Commission’s *Water Quality Regulations (WQR)*.

C. DECISION

Effective on the approval date for Docket No. D-1970-120-5 below, Docket No. D-1970-120-4 is terminated and replaced by Docket No. D-1970-120-5. The project and appurtenant facilities as described in Section A of this docket are approved pursuant to Section 3.8 of the *Compact*, subject to the following conditions:

Monitoring and Reporting

1. The docket holder shall comply with the requirements contained in the EFFLUENT TABLES below. The docket holder shall submit the required monitoring results electronically to the DRBC Project Review Section via email aemr@drbc.gov on the **Annual Effluent Monitoring Report Form** located at this web address: <https://www.nj.gov/drbc/programs/project/docket-app-info.html#3>. The monitoring results shall be submitted annually, absent any observed limit violations, by January 31. If a DRBC effluent limit is violated, the docket holder shall submit the result(s) to the DRBC within 30 days of the violation(s) and provide a written explanation that states the action(s) the docket holder has taken to correct the violation(s) and protect against any future violations. The following average monthly effluent limits are among those listed in the NPDES Permit and meet or are more stringent than the effluent requirements of the DRBC.

EFFLUENT TABLE C-1: DRBC Parameters Included in NPDES Permit for Outfall 001

<u>OUTFALL 001</u> (water softening backwash, RO reject and CT blowdown)		
PARAMETER	LIMIT	MONITORING
pH (Standard Units)	6 to 9 at all times	As required by NPDES Permit
Total Suspended Solids	30 mg/l	As required by NPDES Permit
Total Dissolved Solids*	15,200 mg/l	As required by NPDES Permit
Temperature	110 ° F (Max)	As required by NPDES Permit

* See DECISION Condition C.3.

EFFLUENT TABLE C-2: DRBC Parameters Included in NPDES Permit for Outfall 002

<u>OUTFALL 002</u> (Non-Contact Cooling Water, CT blowdown)		
PARAMETER	LIMIT	MONITORING
pH (Standard Units)	6 to 9 at all times	As required by NPDES Permit
Total Suspended Solids	30 mg/l	As required by NPDES Permit
Total Dissolved Solids*	1,000 mg/l	As required by NPDES Permit
Temperature	110 ° F (Max)	As required by NPDES Permit

* See DECISION Condition C.3.

Other Conditions

2. Except as otherwise authorized by this docket, if the docket holder seeks relief from any limitation based upon a DRBC water quality standard or minimum treatment requirement, the

docket holder shall apply for approval from the Executive Director or for a docket revision in accordance with Section 3.8 of the *Compact* and the *Rules of Practice and Procedure*.

3. The docket holder may request permission from the Executive Director to perform specific conductance monitoring in lieu of TDS monitoring. The request shall be made in writing and shall include information that supports the effluent specific correlation between TDS and specific conductance. Upon review, the Executive Director may modify the docket to allow specific conductance monitoring in lieu of TDS monitoring.

4. This approval shall expire on the expiration date set forth below unless prior thereto the docket holder has applied to the Commission to renew or extend this approval.

5. The docket holder is responsible for timely submittal to the DRBC of a docket renewal application on the appropriate application form including the appropriate docket application filing fee (see 18 C.F.R. 401.43) at least 6 months in advance of the docket expiration date set forth below. The docket holder will be subject to late filed renewal surcharges in the event of untimely submittal of its renewal application, whether DRBC issues a reminder notice in advance of the deadline or the docket holder receives such notice. If the docket holder has not applied to renew the docket or the DRBC is unable to reissue the docket before the expiration date below, the terms and conditions of the current docket will remain fully effective and enforceable pending the renewal of the docket.

6. The docket holder is permitted to treat and discharge wastewater as set forth in the Area Served Section of this docket, which incorporates by reference the Type of Discharge and Service Area sections of the docket holder's Application to the extent consistent with all other conditions of this section. Any expansion beyond that included in Section A.3. Area Served is subject to DRBC review and approval in accordance with Section 3.8 of the *Compact*.

7. In accordance with the Commission's regulations at 18 C.F.R. Part 440, the docket holder is prohibited from discharging wastewater from high volume hydraulic fracturing ("HVHF") or HVHF-related activities to water or land within the Basin. Violation of this or any condition of this docket approval may result in enforcement, including the risk of financial penalties, pursuant to Section 14.17 of the *Delaware River Basin Compact* and Section 2.7.8 (18 CFR 401.98) of the Commission's *Rules of Practice and Procedure*.

8. The facility and operational records shall be available at all times for inspection by the DRBC.

9. The facility shall be operated at all times to comply with the requirements of the Commission's *WQR*.

10. If at any time the receiving treatment plant proves unable to produce an effluent that is consistent with the requirements of this docket approval, no further connections shall be permitted until the deficiency is remedied.

11. Nothing herein shall be construed to exempt the docket holder from obtaining all necessary permits and/or approvals from other State, Federal or local government agencies having jurisdiction over this project.
12. The docket holder shall discharge wastewater in such a manner as to avoid injury or damage to fish or wildlife and shall avoid any injury to public or private property.
13. No sewer service connections shall be made to newly constructed premises with plumbing fixtures and fittings that do not comply with water conservation performance standards contained in Resolution No. 88-2 (Revision 2).
14. The issuance of this docket approval shall not create any private or proprietary rights in the waters of the Basin, and the Commission reserves the right to amend, suspend or rescind the docket for cause, to ensure proper control, use and management of the water resources of the Basin.
15. The docket holder shall be subject to applicable DRBC regulatory program fees, in accordance with duly adopted DRBC resolutions and/or regulations (see 18 C.F.R. 401.43).
16. This approval is transferable by request to the DRBC Executive Director provided that the project purpose and area served approved by the Commission in this docket will not be materially altered because of the change in project ownership. The request shall be submitted on the appropriate form and be accompanied by the appropriate fee (see 18 C.F.R. 401.43).
17. The docket holder shall request a name change if the name of the entity to which this approval is issued changes its name. The request for name change shall be submitted on the appropriate form and be accompanied by the appropriate fee (see 18 C.F.R. 401.43).
18. The Executive Director may modify or suspend this approval or any condition thereof, or require mitigating measures pending additional review, if in the Executive Director's judgment such modification or suspension is required to protect the water resources of the Basin.
19. Any person who objects to a docket decision by the Commission may request a hearing in accordance with Article 6 of the *Rules of Practice and Procedure (RPP)*. In accordance with Section 15.1(p) of the *Delaware River Basin Compact*, cases and controversies arising under the *Compact* are reviewable in the United States district courts.

BY THE COMMISSION

APPROVAL DATE:

EXPIRATION DATE: September 30, 2031