

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

Application Type DEP-Initiated Major Amendment
Facility Type Industrial
Major / Minor Minor

Application No. PA0095176
APS ID 1148806
Authorization ID 1546463

Applicant and Facility Information

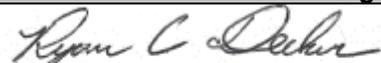
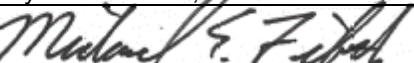
Applicant Name	<u>Elliott Company, Inc.</u>	Facility Name	<u>Jeannette Facility</u>
Applicant Address	<u>901 North 4th Street</u> <u>Jeannette, PA 15644-1474</u> <u>Jason Steele, Sr. Manager EHS; Global Manufacturing</u>	Facility Address	<u>Jeannette Machine Plant</u> <u>Jeannette, PA 15644-0800</u>
Applicant Contact	<u>Jason Steele, Sr. Manager EHS; Global Manufacturing</u>	Facility Contact	<u>***same as applicant***</u>
Applicant Phone	<u>(724) 600-8283</u>	Facility Phone	<u>***same as applicant***</u>
Applicant Email	<u>jsteele@elliott-turbo.com</u>	Facility Email	<u>***same as applicant***</u>
Client ID	<u>79629</u>	Site ID	<u>244365</u>
SIC Code	<u>3511, 3563</u> <u>Manufacturing - Air And Gas Compressors, Manufacturing - Turbines And Turbine Generator Sets</u>	Municipality	<u>Jeannette City</u>
SIC Description	<u>Manufacturing - Air And Gas Compressors, Manufacturing - Turbines And Turbine Generator Sets</u>	County	<u>Westmoreland</u>
Date Application Received	<u>N/A</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>N/A</u>	If No, Reason	<u></u>
Purpose of Application	<u>Modification of effluent limitations and related requirements for Oil & Grease at Outfalls 003 and 015.</u>		

Summary of Review

On June 26, 2025, the Department of Environmental Protection (DEP) renewed NPDES Permit PA0095176 for discharges from Elliott Company, Inc.'s (Elliott) Jeannette Facility. On July 24, 2025, Elliott filed an appeal of the June 26, 2025 permit. Elliott's Notice of Appeal is attached. Elliott objected to DEP's calculation of Oil and Grease effluent limits at Outfalls 003 and 015.

Elliott combines multiple sources for treatment and discharge through Outfalls 003 and 015. Sources discharging through Outfall 003 include the following in decreasing order by volume: building/machine foundation sumps (groundwater), boiler blowdown, cooling tower blowdown, building/machine foundation sumps (process wastewater), hydrostatic testing wastewater, storm water from the gas/diesel aboveground storage tank containment drain, and paint booth steam cleaning water. Sources discharging through Outfall 015 include the following in decreasing order by volume: intermittent storm water, building/machine foundation sumps (groundwater), building/machine foundation sumps (process wastewater), cooling tower blowdown, and hydrostatic testing wastewater. Wastewaters directed to each outfall are treated by an oil/water separator.

Elliott has a series of concrete-lined pits at the Jeannette Facility that contain manufacturing and testing machinery/equipment associated with "oily operations" regulated under 40 C.F.R. Part 438 – Metals Products and Machinery Point Source Category Effluent Limitations Guidelines. During an October 16, 2025 inspection of the facility by DEP, Elliott indicated that the pits' foundations are approximately twenty-two feet deep and that the groundwater table across the site is shallow at approximately six to nine feet deep. Consequently, the pits' foundations are thirteen to sixteen feet below the groundwater table. To maintain the structural integrity of the pits and mitigate buoyant forces acting on the pits' foundations, the exterior of each pit is surrounded by several groundwater sumps that are used to pump groundwater away from the foundations. The groundwater is presumptively uncontaminated by oils and greases except for 1) the introduction of oils and greases directly into the sumps

Approve	Deny	Signatures	Date
✓		 Ryan C. Decker, P.E. / Environmental Engineer	February 12, 2026
✓		 Michael E. Fifth, P.E. / Environmental Engineer Manager	February 12, 2026

Summary of Review

from grates covering the sumps, and 2) the combination of groundwater pumped from the sumps, oily wastewaters from the pits, and other process wastewaters for treatment and discharge.



Lat: 40.33865, Long: -79.60932 10/16/2025 11:13:51 AM

Image 1. Equipment pit (typ.)



Lat: 40.33870, Long: -79.60929 10/16/2025 11:19:10 AM

Image 2. Groundwater sump and equipment pit

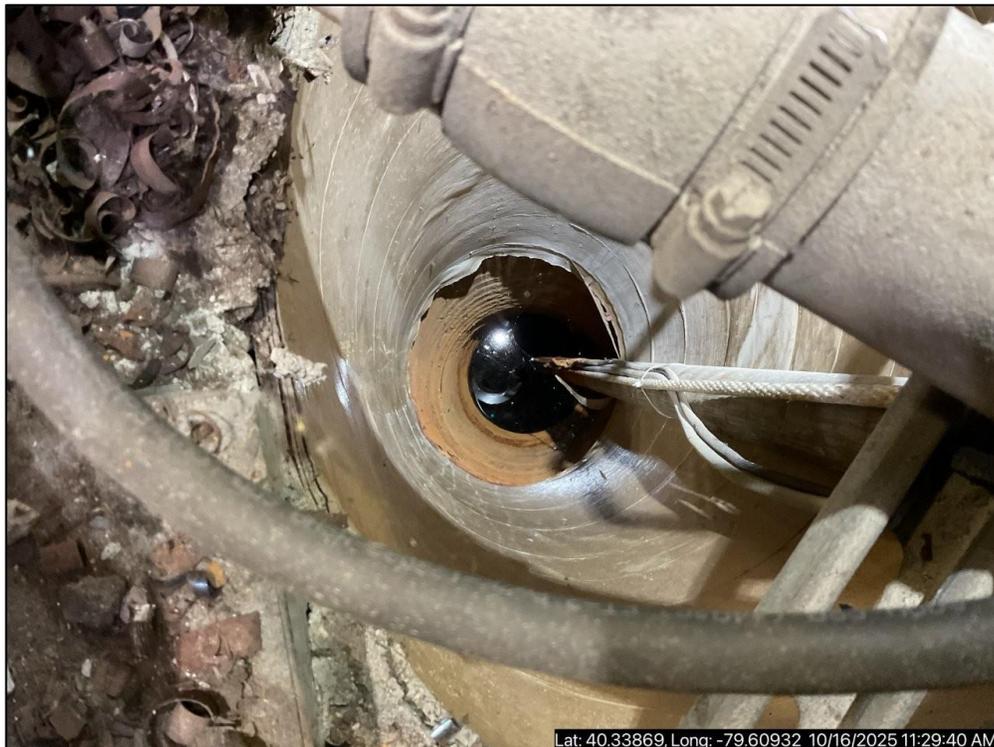
Summary of Review

Elliott indicated that it uses the groundwater sumps as a form of secondary containment (basically, floor drains that are directed to treatment). If there is a spill near one of the sumps, then the spilled fluids would flow into the sumps through the grates and then be pumped to treatment. Elliott considered this passive collection procedure to be advantageous for spill management.



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Image 3. Groundwater sump with grate removed (typ.)



Lat: 40.33869, Long: -79.60932 10/16/2025 11:29:40 AM

Image 4. View down groundwater sump (typ.)

Summary of Review

Based on DEP inspections at the Facility and a review of the storm water and groundwater conveyance and treatment facilities at the Facility, DEP has determined that the following revisions to the NPDES permit are warranted:

- Remove more stringent effluent limits for Oil and Grease at Outfalls 003 and 015 that are due to take effect 59 months after the permit effective date.
- Extend the 15.0 mg/L average monthly and 30.0 mg/L maximum daily Oil and Grease limits at Outfalls 003 and 015 so that they are effective for the entire permit term.
- Remove Oil and Grease from Part C, Condition VII “Schedule of Compliance for Total Suspended Solids and Oil & Grease”.

DEP agrees to those changes because DEP acknowledges that Elliott’s oil/water separators are designed to effectively remove Oil and Grease from the full volume of wastewaters they receive. Since none of the requirements removed from the permit have taken effect, there are no anti-backsliding implications.

Pollution Prevention

25 Pa. Code § 92a.10 states:

- (a) The Department will encourage pollution prevention by providing assistance to the permittee and users of the permittee’s facilities in the consideration of pollution prevention measures such as process changes, materials substitution, reduction in volume of water use, in-process recycling and reuse of water and general measures of “good housekeeping” within the plant or facility.
- (b) The Department will encourage consideration of the following measures, in descending order of preference, for environmental management of wastes:
 - (1) Process change.
 - (2) Materials substitution.
 - (3) Reuse.
 - (4) Recycling.
 - (5) Treatment.
 - (6) Disposal.

In the context of 25 Pa. Code § 92a.10, DEP provides the following:

The intentional combination of groundwater from building foundation drains and contaminated process wastewaters is not an industry best practice. Foundation drains are normally kept separate from industrial wastewaters to prevent foundation drain water that is generally uncontaminated from becoming contaminated by industrial wastewaters. The separation of those sources reduces the volume of industrial wastewater that must be collected, treated, and discharged in compliance with NPDES permit effluent limits. In that respect, note that “treatment” is the second to last option in order of preference for environmental management of wastes under § 92a.10(b).

Absent a spill or another source of flowing water/fluids, residual oils and greases on the plant floor are unlikely to be mobilized into the groundwater sumps in significant quantities. Also, consistent with their purpose, all groundwater sumps are located near equipment pits, so the equipment pits themselves could be used as secondary containment for spillage instead of the groundwater sumps.

In the interest of pollution prevention, DEP encourages Elliott to consider the following measures to reduce or separate groundwater from process wastewaters, or otherwise to reduce the exposure of groundwater to industrial contaminants:

- Install removable, sealable covers over the groundwater sumps to prevent direct inflow of spillage and residual contaminants into the groundwater sumps.
- Install shallow grated surface channels into the plant floor around the groundwater sumps to direct any spillage and residual contaminants near the equipment pits directly into the equipment pits themselves and away from the

Summary of Review

groundwater sumps. This would convert the pits into secondary containment and maintain a passive collection method for spills on the plant floor instead of using the groundwater sumps for that purpose.

- For pits equipped with permanent pumps that are connected to the wastewater collection system that leads to the oil/water separators at Outfalls 003 and 015, convert those pits into standalone containment structures from which process wastewater is pumped in a manual operation as needed. Elliott reported during DEP's October 16, 2025 inspection that some pits need to be cleaned out manually because they are not plumbed into the wastewater collection systems that lead to the oil/water separators. To the extent that separation of groundwater and process wastewater from the pits is not possible due to buried piping and inaccessible infrastructure where those sources combine, eliminating contributions of process wastewaters might be an option given the relatively small volumes of process wastewaters generated at the facility compared to foundation drain groundwater.
- Perform inspections of the equipment pits for cracks/groundwater infiltration and repair as necessary.
- Seal floor drains in the paint booth.

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.



COMMONWEALTH OF PENNSYLVANIA
ENVIRONMENTAL HEARING BOARD

NOTICE OF APPEAL FORM
APPEAL INFORMATION

1. Name, address, telephone number, and email address (if available) of Appellant:

Elliott Company, Inc.
901 N. 4th Street
Jeannette, PA 15644-1474
(724) 600-8265

2. Describe the subject of your appeal:

(a) What action of the Department do you seek to have the Board review (for example, a permit, license or order issued or denied by the Department, an assessment of a civil penalty or some other determination made by the Department)?

Issuance of NPDES Permit No. PA0095176 (See Exhibit A)

(b) Which Department official took the action (usually the person identified on any written notice that you received)?

Christopher Kriley, P.E.
Environmental Program Manager
Southwest Regional Office
Pennsylvania Department of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA 15222-4745

(c) What is the location of the operation or activity which is the subject of the Department's action (the municipality and/or county where the activity takes place or will take place)?

Jeannette City, Westmoreland County

(d) How, and on what date, did you receive notice of the Department's action? Please specify whether through public notice, a letter or email from the Department, or some other source.

On June 26, 2025, by Email

(e) Did you receive written notification of the Department's action (for example, letter, order or permit that you are appealing)? If yes, you **must** attach a copy of the notification to this Notice of Appeal. If you are appealing a permit, you may attach the first page rather than the



**NOTICE OF APPEAL FORM
APPEAL INFORMATION, CONT.**

entire document. In lieu of attaching the document, you may provide a link to notice of the action in the *Pennsylvania Bulletin*. See filing instructions for further instruction.

See Exhibit A, attached.

3. Specify any related appeal(s) now pending before the Board. If you are aware of any such appeal(s) provide that information.

None

4. Describe your objections to the Department's action in separate, numbered paragraphs. Rather than use the space on this form, you may type your objections on separate paper if you require more space. **NOTE:** The objections may be factual or legal and must be specific. It is important that you include **ALL** your objections in this section. Although you may be able to amend your appeal to add new objections, you may require permission of the Board to do so, and you may not be able to raise omitted objections later in the appeal process.

See Exhibit B, attached.



**NOTICE OF APPEAL FORM
SIGNATURE PAGE**

By filing this Notice of Appeal with the Environmental Hearing Board, I hereby certify that the information submitted is true and correct to the best of my information and belief. Additionally, I certify that a copy of this Notice of Appeal was served upon each of the individuals indicated on Page 3 of this form on the following date: July 24, 2025

/s/ Lisa M. Bruderly

Signature of Appellant or Appellant's Counsel

Date: July 24, 2025

If you have authorized counsel to represent you, please supply the following information (*Corporations must be represented by counsel*):

Attorney Name (Type or Print)

Lisa M. Bruderly
Attorney No. 87484

Address

Babst, Calland, Clements, & Zomnir, P.C.
Two Gateway Center
Pittsburgh, PA 15222

Telephone No.: (412) 394-6495

Email: lbruderly@babstcalland.com

TDD users please contact the Pennsylvania Relay Service at 1-800-654-5984. If you require an accommodation or this information in an alternative form, please contact the Secretary to the Board at 717-787-3483.

Please see the attached Filing Instructions for additional information and requirements regarding the filing of this form



EXHIBIT A
NPDES PERMIT NO. PA0095176



3800-PM-BCW0011 Rev. 8/2021
Permit
 Pennsylvania
Department of
Environmental Protection

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF CLEAN WATER

**AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
DISCHARGE REQUIREMENTS FOR INDUSTRIAL WASTEWATER
FACILITIES**

NPDES PERMIT NO: PA0095176

In compliance with the provisions of the Clean Water Act, 33 U.S.C. Section 1251 *et seq.* ("the Act") and Pennsylvania's Clean Streams Law, as amended, 35 P.S. Section 691.1 *et seq.*,

Elliott Company, Inc.
901 N 4th Street
Jeannette, PA 15644-1474

is authorized to discharge from a facility known as Jeannette Facility, located in Jeannette City, Westmoreland County, to Unnamed Tributary to Brush Creek (TSF) and Unnamed Tributary of Brush Creek (TSF) in Watershed(s) 19-A in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts A, B and C hereof.

THIS PERMIT SHALL BECOME EFFECTIVE ON AUGUST 1, 2025

THIS PERMIT SHALL EXPIRE AT MIDNIGHT ON JULY 31, 2030

The authority granted by this permit is subject to the following further qualifications:

1. If there is a conflict between the application, its supporting documents and/or amendments and the terms and conditions of this permit, the terms and conditions shall apply.
2. Failure to comply with the terms, conditions or effluent limitations of this permit is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (40 CFR 122.41(a))
3. A complete application for renewal of this permit, or notice of intent to cease discharging by the expiration date, must be submitted to DEP at least 180 days prior to the above expiration date (unless permission has been granted by DEP for submission at a later date), using the appropriate NPDES permit application form. (40 CFR 122.41(b), 122.21(d)(2))

In the event that a timely and complete application for renewal has been submitted and DEP is unable, through no fault of the permittee, to reissue the permit before the above expiration date, the terms and conditions of this permit, including submission of the Discharge Monitoring Reports (DMRs), will be automatically continued and will remain fully effective and enforceable against the discharger until DEP takes final action on the pending permit application. (25 Pa. Code §§ 92a.7(b), (c))

4. This NPDES permit does not constitute authorization to construct or make modifications to wastewater treatment facilities necessary to meet the terms and conditions of this permit.

DATE PERMIT ISSUED JUNE 26, 2025

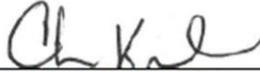
ISSUED BY 
Christopher Kriley, P.E.
Environmental Program Manager
Southwest Regional Office



EXHIBIT B



EXHIBIT B TO NOTICE OF APPEAL

Appellant Elliott Company, Inc. (“Elliott”) appeals the June 26, 2025 issuance of National Pollutant Discharge Elimination System (“NPDES”) Permit No. PA0095176 (the “Permit”) by the Pennsylvania Department of Environmental Protection (the “Department”) for the Elliott facility located in Jeannette, Pennsylvania (the “Facility”). Elliott objects to the issuance of the Permit as being unlawful, unreasonable, arbitrary, capricious, and/or an abuse of discretion, for reasons that include, but are not limited to, the following:

1. The Department provides no lawful basis to decrease the effluent limits for oil and grease (“O&G”) for Outfalls 003 and 015 such that, three years after the effective date of the Permit, the daily maximum and monthly average O&G effluent limitations for both outfalls would decrease from 30 mg/l to 5.3 mg/l and from 15 mg/l to 5.1 mg/l, respectively.
2. The effluent limits for O&G at Outfalls 003 and 015 are inconsistent with Pennsylvania regulations and guidance and should be recalculated to reflect the allowable quantity of O&G in the non-process wastewater flow.
3. Any change to the O&G effluent limitations for Outfalls 003 and 015 is unreasonable, given that between the permit issued in 2002 and issuance of the renewed Permit, (a) there has been no change to 25 Pa. Code 95.2(2), regarding “oil-bearing wastewaters” and no appreciable change to the Facility’s discharge; and (b) the O&G technology-based effluent limitations (“TBELs”) of 25 Pa. Code 95.2(2) are more stringent than the effluent limitation guidelines (“ELGs”) of 40 CFR Part 438, which was promulgated in the interim.
4. Decreasing the O&G effluent limitations for Outfalls 003 and 015 is arbitrary and unreasonable when the Facility has been meeting the existing limits of 30 mg/l daily maximum and 15 mg/l average monthly, which were calculated taking into account all process and non-process wastewater flow to the respective outfall.
5. Inputting 5.0 mg/l O&G (i.e., the O&G Target Quantitation Level (“QL”)) for the non-process wastewater into the flow-weighted formula for both the monthly average and daily maximum concentrations of O&G effectively imposes an unsubstantiated Best Professional Judgment TBEL for the non-process wastewater.
6. The Department arbitrarily assumes that groundwater from the foundation sumps and secondary containment drainage, among other wastewater, have no detectable oil.
7. Elliott’s identifying of “likely” oil-bearing wastewaters in Attachment 3 of Elliott’s February 21, 2025 letter was unreasonably construed by the Department to definitively identify wastewater with O&G concentrations below 5.0 mg/l.
8. The Department inputting a 5.0 mg/l O&G concentration, based on the QL, for the non-process wastewater, is arbitrary, capricious, unreasonable and inconsistent with the Department’s NPDES permits for similar types of non-process wastewater discharges, including general NPDES permits (with 30 mg/l O&G benchmarks) such as PAG-03 for stormwater discharges associated with industrial activity and PAG-10 for hydrostatic test



water. Several of the non-ELG waste streams would be regulated under these general permits, including stormwater from aboveground storage tank secondary containment, “uncontaminated groundwater,” and “foundation or footing drains where flows are not contaminated with process materials.”

9. The Department incorrectly conflates ELG-regulated waste streams from “oily operations,” as defined in 40 CFR 438.2(f), with the Department’s categorization of oil-bearing waste streams. The Department incorrectly calculates O&G effluent limitations in the flow-weighted formula by applying the O&G effluent limitations in 25 Pa. Code 95.2 to only the waste streams from “oily operations,” as defined in 40 CFR 438.2(f), while the QL is applied to all other waste streams.
10. Neither “oil-bearing” nor “non-oil bearing” is defined in the Department’s NPDES regulations.
11. O&G effluent limitations for Outfalls 003 and 015 should be calculated using a daily maximum concentration of 30 mg/l and a monthly average concentration of 15 mg/l for the non-process wastewater, which would result in a daily maximum limitation for O&G at Outfalls 003 and 015 of 30 mg/l and a monthly average limitation of 15 mg/l, consistent with the administratively extended permit.
12. Elliott reserves the right to amend this Notice of Appeal and/or assert additional grounds for appeal based on any other objections that may become known through discovery, changes in law, fact or pertinent circumstances, action by the Department, or otherwise.
13. The Department’s issuance of the Permit, with the identified O&G effluent limitations is otherwise arbitrary, capricious, unreasonable, and/or unlawful.