

# Southwest Regional Office CLEAN WATER PROGRAM

Application Type	Renewal
Facility Type	Industrial
Major / Minor	Minor

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

Application No.	PA0253197
APS ID	745182
Authorization ID	1310300

Applicant Name	Rollo	ck Co.	Facility Name	Rollock Co.
Applicant Address	3179	Lincoln Highway	Facility Address	1317 1319 Main Street
	Stoys	town, PA 15563-7919	_	Johnstown, PA 15905
Applicant Contact	Antho	ny Kordell	Facility Contact	Anthony Kordell
Applicant Phone	(814)	629-9400	Facility Phone	(814) 629-9400
Client ID	14565	59	Site ID	665565
SIC Code	5093		Municipality	Franklin Borough
SIC Description	Whole Mater	esale Trade - Scrap And Waste ials	County	Cambria
Date Application Rec	eived	April 1, 2020	EPA Waived?	Yes
Date Application Acco	epted	April 6, 2020	If No, Reason	

### **Summary of Review**

The Department received a NPDES renewal application from Rollock Company on April 10, 2020 for its facility in Conemaugh Township, Cambria County. The facility is a metal recycling and slag processer with a SIC code of 5093 (Scrap and Waste Materials).

Rollock is a ferrous and non-ferrous metals recycler and a slag processer. Scrap metals from industrial and commercial sites are brought to the facility, segregated, and shipped for off-site processing. The slag processing facility, operating under a joint-venture with Phoenix Services LLC, removes any metal from the slag and then screens and sizes the slag for sale as aggregate. Rollock utilizes screens and shears to separate the materials in a mechanical-physical only process, no chemical processing or treatment of the metals or slag is done at the facility. The property is 99 acres, 10 to 15 acres of which are used for industrial activity. All non-ferrous material is stored inside the building, and the ferrous material is stored outdoors in the scrap yard behind the building. The slag processing area has blast furnace slag and steelmaking slag. A concrete jersey barrier is maintained between the slag processing plant and the river to segregate these two areas.

Rollock has seven stormwater outfalls that all discharge to the Little Conemaugh River, designated in 25 PA Code Chapter 93 as a Warm Water Fishery (WWF). Outfalls 001, 002 and 003 are located along the river on the eastern side of the facility buildings. Outfalls 900, 901, 902 and 903 are located further upstream from the facility. The outfalls receive an off-site contribution of acid mine drainage (AMD) not associated with the site's activities from seeps along the hillside off site. The Department conducted a site visit on July 12, 2006 and verified that the AMD originates from offsite and is not a product of the Rollock Company property.

Outfall 001 discharges from a pipe installed below the building. The pipe begins at the ditch that runs along the back of the building on the western side. This ditch collects stormwater from the hillside above the property. The Outfall 001 pipe has a break in continuity at the railroad bed wall. Water discharges and then enters the pipe again below the slag. The pipe runs

Approve	Deny	Signatures	Date
х		ah Or	
		Adam Olesnanik / Environmental Engineering Specialist	8/14/2020
х		Michael E. Fifth, P.E. / Environmental Engineer Manager	8/26/2020

# **Summary of Review**

below the tracks and discharges to the vegetated hillside. This outfall was historically the discharge from several old process streams and the prior wastewater treatment plant; however, all wastewater piping connecting to the discharge pipe have been sealed off and are no longer in use.

Outfall 002 and 003 are pipes that originate on one side of the railroad tracks near the building and convey storm water under the tracks to the stream. Due to the pipe age and maintenance of the railroad performed by the rail tracks owner, the pipes have not been well maintained. Outfall 002 originates on the building side of the tracks and discharges to the vegetated hillside. Outfall 003 originates near the railroad wall, and discharges at the edge of the wall. Stormwater flows over the slag railroad bed and discharges to the Little Conemaugh River over the vegetated hillside.

Outfall 900 is located adjacent to the scrapyard area, and Outfalls 901, 902 and 903 are located along the abandoned rail bed and hillside. As discussed above, these outfalls may receive AMD from off-site via groundwater seeps along the hillside. A Pollution Reduction Report was submitted by Republic Technologies International, LLC in September of 2001 for Outfall 902. The Department conducted a site visit on July 12, 2006. Both the report and the site visit verify the AMD originates from offsite and is not a product of the Rollock Company property.

The site was last inspected on May 2, 2016; no violations were noted. The permittee has no open violations.

Draft permit issuance is recommended.

#### **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.

Discharge, Receiving Water	s and Water Supply Inforr	nation	
Outfall No. 001		Design Flow (MGD)	0
Latitude 40° 20' 59"		Longitude	-78° 52' 50"
Quad Name Johnstown		Quad Code	1614
Wastewater Description:	Stormwater		
·			
Receiving Waters Little	Conemaugh River (WWF)	Stream Code	45815
NHD Com ID 12372	20384	RMI	3.07
Watershed No. 18-E		Chapter 93 Class.	WWF
Existing Use		Existing Use Qualifier	
Exceptions to Use	cceptions to Use		
Assessment Status	Impaired		
Cause(s) of Impairment	Habitat Alterations		
Source(s) of Impairment	Channelization		
TMDL Status	Final	Kiskiminetas-Conemaugh River Name Watersheds TMDL	
Nearest Downstream Publi	c Water Supply Intake	Buffalo Township Municipal A	uthority Freeport
PWS Waters Allegher	ny River	Flow at Intake (cfs)	
PWS RMI 29.0945		Distance from Outfall (mi)	83.163

Outfall No. 002	_	Design Flow (MGD)	0
Latitude 40° 20' 59	"	Longitude	-78° 52' 49"
Quad Name <u>Johnsto</u>	own	Quad Code	1614
Wastewater Description	Stormwater		
Receiving Waters Lit	le Conemaugh River (WWF)	Stream Code	45815
	3720384	RMI	3.07
Watershed No. 18	·E	Chapter 93 Class.	WWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	Habitat Alterations		
Source(s) of Impairmen	Channelization		
TMDL Status	Final	Kiskiminetas Name Watersheds	s-Conemaugh River TMDL
Nearest Downstream Po	ıblic Water Supply Intake	Buffalo Township Municipal A	uthority Freeport
PWS WatersAlleg	heny River	Flow at Intake (cfs)	
PWS RMI 29.09	945	Distance from Outfall (mi)	83.163

Discharge, Receiving Wate	rs and Water Supply Inforn	nation	
Outfall No. 003		Design Flow (MGD)	0
Latitude 40° 20′ 57"		Longitude	-78° 52' 49"
Quad Name Johnstowi			1614
Wastewater Description:	Stormwater		
Receiving Waters Little	Conemaugh River (WWF)	Stream Code	45815
NHD Com ID 1237	20384	RMI	3.01
Watershed No. <u>18-E</u>		Chapter 93 Class.	WWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired	<del></del> :	
Cause(s) of Impairment	Habitat Alterations		
Source(s) of Impairment	Channelization		
TMDL Status	Final	Kiskiminetas-Conemaugh River Name Watersheds TMDL	
Nearest Downstream Publ	ic Water Supply Intake	Buffalo Township Municipal A	uthority Freeport
PWS Waters Alleghe	ny River	Flow at Intake (cfs)	
PWS RMI 29.0945	5	Distance from Outfall (mi)	83.163

Outfall No. 900		Design Flow (MGD)	0	
Latitude 40° 21' 0"		Longitude	-78º 52' 10"	
Quad Name <u>Jo</u>	hnstown	1	Quad Code	1615
Wastewater Descr	iption:	Stormwater		
Doggiving Waters	Little	Conomough Bivor (M/M/E)	Stream Code	45815
Receiving Waters		Conemaugh River (WWF)		
NHD Com ID		18958	RMI	3.90
Watershed No.	<u>18-E</u>		Chapter 93 Class.	WWF
Existing Use			Existing Use Qualifier	
Exceptions to Use			Exceptions to Criteria	
Assessment Status Impaired				
Cause(s) of Impair	ment	Metals		
Source(s) of Impai	rment	Acid Mine Drainage		
TMDL Status		Final	Kiskiminetas Name Watersheds	s-Conemaugh River TMDL
Nearest Downstre	am Publi	c Water Supply Intake	Buffalo Township Municipal A	uthority Freeport
PWS Waters	Allegher	ny River	Flow at Intake (cfs)	
PWS RMI	29.0945		Distance from Outfall (mi)	83.163

NHD Com ID

Existing Use

Watershed No.

Exceptions to Use

123718958

18-E

4.24

WWF

Discharge, Receiving Waters and Water Supply Inform	nation	
Outfall No. 901	Design Flow (MGD)	0
Latitude 40° 21' 3"	Longitude	-78° 51' 55"
Quad Name Johnstown	Quad Code	1615
Wastewater Description: Stormwater		
Receiving Waters Little Conemaugh River (WWF)	Stream Code	45815
NHD Com ID <u>123718958</u>	RMI	4.12
Watershed No. 18-E	Chapter 93 Class.	WWF
Existing Use	Existing Use Qualifier	
Exceptions to Use	Exceptions to Criteria	
Assessment Status Impaired		
Cause(s) of Impairment Metals		
Source(s) of Impairment Acid Mine Drainage		
TMDI Otatua		-Conemaugh River
TMDL Status Final	Name Watersheds	TWDL
Noncot Dougotroom Dublic Weter Cumply Intole	Duffala Taumahin Municipal A	uth suits. Fus anout
Nearest Downstream Public Water Supply Intake	Buffalo Township Municipal Au	uthority Freeport
PWS Waters Allegheny River	Flow at Intake (cfs)	00.400
PWS RMI 29.0945	Distance from Outfall (mi)	83.163
Discharge, Receiving Waters and Water Supply Inform	mation	
Outfall No. 902	Design Flow (MGD)	0
Latitude 40° 21′ 5″	Longitude	-78° 51' 47"
Quad Name Johnstown	Quad Code	1615
Wastewater Description: Stormwater		
Receiving Waters Little Conemaugh River (WWF)	Stream Code	45815

Assessment Stat	us	Impaired			
Cause(s) of Impa	irment	Metals			
Source(s) of Impa	airment	Acid Mine Drainage			
				Kiskiminetas	-Conemaugh River
TMDL Status		Final	Name	Watersheds	TMDL
Nearest Downstre	eam Publ	ic Water Supply Intake	Saltsburg Munic	cipal Waterworl	ks
<b>PWS Waters</b>	Conema	augh River	Flow at Intak	e (cfs)	
PWS RMI	0.5		Distance fron	n Outfall (mi)	56.1
PWS RMI	0.5		Distance fror	n Outfall (mi)	56.1

RMI

Chapter 93 Class.

**Existing Use Qualifier** 

**Exceptions to Criteria** 

Outfall No. 903		Design Flow (MGD)	0
Latitude 40° 21' 9"		Longitude	-78° 51' 35"
Quad Name Johnstown		Quad Code	1615
Wastewater Description: Stormwater			
Receiving Waters <u>Little</u>	Conemaugh River (WWF)	Stream Code	45815
NHD Com ID 1237	′18958	RMI	4.24
Watershed No. 18-E		Chapter 93 Class.	WWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	Metals		
Source(s) of Impairment	Acid Mine Drainage		
TMDL Status	Final	Kiskiminetas Name Watersheds	s-Conemaugh River TMDL
Nearest Downstream Pub	lic Water Supply Intake	Buffalo Township Municipal A	uthority Freeport
PWS Waters Alleghe	eny River	Flow at Intake (cfs)	•
PWS RMI 29.094	5	Distance from Outfall (mi)	83.163

	Development of Effluent Limitations					
Outfall No.	001, 002, 003, 900, 901, 902, and 903	Design Flow (MGD)	N/A			
Latitude	Varies	Longitude	Varies			
Wastewater Description: Stormwater						

#### Stormwater Technology Limits

At a minimum, Outfalls 001, 002, 003, 900, 901, 902, and 903 are subject to PAG-03 General Stormwater Permit conditions as a minimum requirement because the outfalls discharge stormwater associated with industrial activity. The SIC code for the site is 5093 (recyclable material wholesalers) and the corresponding appendix of the PAG-03 that would apply to the facility is Appendix P (Scrap and Waste Recycling Facilities). The reporting requirements applicable to stormwater discharges are shown in Table 1 below. Along with the monitoring requirements, sector specific BMPs included in Appendix P of the PAG-03 will also be included in Part C of the Draft Permit.

Table 1: PAG-03 Appendix (P) Monitoring Requirements

Parameter	Max Daily Concentration	Measurement Frequency	Sample Type
Total Suspended Solids (TSS)	Monitor and Report	1/6 Months	Grab
Oil and Grease	Monitor and Report	1/6 Months	Grab
Chemical Oxygen Demand (COD)	Monitor and Report	1/6 Months	Grab
Total Copper	Monitor and Report	1/6 Months	Grab
Total Lead	Monitor and Report	1/6 Months	Grab
Total Zinc	Monitor and Report	1/6 Months	Grab

# **Water Quality-Based Limitations**

#### Stormwater WQBELs

Water quality analyses are typically performed under low-flow (Q7-10) conditions. Stormwater discharges occur at variable rates and frequencies but not however during Q7-10 conditions. Since the discharges from Outfalls 001 and 002 are composed entirely of stormwater, a formal water quality analysis cannot be accurately conducted. Accordingly, water quality-based effluent limitations are not proposed.

#### **Total Maximum Daily Loads**

Wastewater discharges from the Rollock Company are located within the Kiskiminetas-Conemaugh River Watersheds for which the Department has developed a TMDL. The TMDL was finalized on January 29, 2010 and establishes waste load allocations for the discharge of aluminum, iron and manganese within the Kiskiminetas-Conemaugh River Watersheds. Section 303(d) of the Clean Water Act and the U.S. Environmental Protection Agency's Water Quality Planning and Management Regulations (codified at Title 40 of the Code of Federal Regulations Part 130) require states to develop a TMDL for impaired water bodies. A TMDL establishes the amount of a pollutant that a water body can assimilate without exceeding the water quality criteria for that pollutant. TMDLs provide the scientific basis for a state to establish water quality-based controls to reduce pollution from both point and non-point sources in order to restore and maintain the quality of the state's water resources (USEPA 1991a). Stream reaches within the Kiskiminetas-Conemaugh River Watersheds are included in the state's 2008 Section 303(d) list because of various impairments, including metals, pH and sediment. The TMDL includes consideration for each river and tributary within the target watershed and its impairment sources. Stream data is then used to calculate minimum pollutant reductions that are necessary to attain water quality criteria levels. Target concentrations published in the TMDL were based on established water quality criteria of 0.750 mg/L total recoverable aluminum, 1.5 mg/L total recoverable iron based on a 30-day average and 1.0 mg/L total recoverable manganese. The reduction needed to meet the minimum water quality standards is then divided between each known point and non-point pollutant source in the form of a watershed allocation. TMDLs prescribe allocations that minimally achieve water quality criteria (i.e., 100 percent use of a stream's assimilative capacity). Rollock's permit, (PA0253197), is listed in the Appendix G of the Kiskiminetas-Conemaugh River Watersheds TMDL and received waste load allocations for Outfall 001. The allocations were imposed on Outfall 001 because process wastewater was discharged via Outfall 001 in the past. However, Outfall 001 no longer discharges process wastewater and only stormwater is discharged via Outfall 001 and the other outfalls at the site; therefore, only monitor and report for aluminum, iron and manganese will be imposed at Outfalls 001, 002, 003, 900, 901, 902, and 903 based on the Kiskiminetas-Conemaugh River Watersheds TMDL.

# **Anti-Backsliding**

Previous limits can be used pursuant to EPA's anti-backsliding regulation, 40 CFR 122.44(I). Previous Limits imposed at Outfalls 001, 002, 003, 900, 901, 902, and 903 are displayed below in Table 2. A Part C condition was included in the current permit stating discharge concentration goals for Outfalls 001, 002 and 003. These goals are included in Table 2 below. The concentration goal will be converted to benchmark values in the new permit and are further discussed below. The samples in the application and in the DMRs indicate that the discharge concentrations exceed the concentration goals for iron and zinc. These discharge concentration goals were not imposed on Outfall 900, 901, 902, and 903. The goals were not imposed on these outfalls because they receives offsite abandoned mine drainage comingling with the discharge. However, it should also be noted that the discharge concentrations of iron, nitrate-nitrite as nitrogen, and zinc at Outfalls 900, 901, 902, and 903 have been above these goals and the pH is consistently below 6.0 S.U. at Outfalls 901 and 902.

**Table 2. Existing Effluent Limitations** 

Parameter	Daily Maximum	Goals	Measurement Frequency	Sample Type
Flow (MGD)	Report	XXX	1/Month	Estimate
pH (S.U.)	Report	6.0-9.0	1/Month	Grab
Nitrate-Nitrate as N	Report	0.68	1/Month	Grab
Total Aluminum (mg/L)	Report	XXX	1/6Months	Grab
Total Iron (mg/L)	Report	1.0	1/6Months	Grab
Total Manganese (mg/L)	Report	XXX	1/6Months	Grab
Total Zinc (mg/L)	Report	0.12	1/Month	Grab

### **Proposed Effluent Limitations and Monitoring Requirements**

The proposed effluent monitoring requirements for Outfalls 001, 002, 003, 900, 901, 902, and 903 are displayed in Table 3 below. A Part C condition is included in the Draft Permit requiring a Corrective Action Plan when there are two consecutive exceedances of the benchmark values, which are also included in the Part C condition. The benchmark values are also displayed below in Table 3 and are only applicable to Outfalls 001, 002, and 003. These values are not effluent limitations, an exceedance of the benchmark value is not a violation. If there are two consecutive exceedances of the benchmark values, a Corrective Action Plan must be developed to identify and install site-specific stormwater controls and BMPs. Benchmark monitoring is a feedback tool, along with routine inspections and visual assessments, for assessing the effectiveness of stormwater controls and BMPs. An exceedance of the benchmark value provides permittees with an indication that the facility's BMPs may not be sufficiently controlling pollutants in stormwater. If Rollock is unable to consistently achieve the benchmark values, the Department may consider the imposition of effluent limitations in the future. It should be noted that even through Outfalls 900, 901, 902, and 903 are not subject to the benchmark values, these outfalls will still need to be sampled and inspected per the permit conditions. The monitoring frequency has been changed from 1/Month to semi-annually on all parameters to reflect the monitoring frequency in the PAG-03 General Permit. This monitoring frequency gives the permittee adequate time between sampling periods to address BMPs and site stormwater controls in the event a Corrective Action Plan is required.

**Table 3. Proposed Monitoring Requirements** 

Parameter	Daily Maximum	Benchmark Values	Measurement Frequency	Sample Type
Flow (MGD)	Report	XXX	1/6 Months	Estimate
pH (S.U.)	Report	6.0-9.0	1/6 Months	Grab
Nitrate-Nitrate as N	Report	0.68	1/6 Months	Grab
TSS (mg/L)	Report	100	1/6 Months	Grab
Oil and Grease	Report	30	1/6 Months	Grab
Chemical Oxygen Demand (COD)	Report	120	1/6 Months	Grab
Total Copper	Report	XXX	1/6 Months	Grab
Total Lead	Report	XXX	1/6 Months	Grab
Total Zinc (mg/L)	Report	0.12	1/6 Months	Grab
Total Iron (mg/L)	Report	1.0	1/6 Months	Grab
Total Aluminum (mg/L)	Report	XXX	1/6 Months	Grab
Total Manganese (mg/L)	Report	XXX	1/6 Months	Grab

Tools and References Used to Develop Permit		
WQM for Windows Model (see Attachment )		
PENTOXSD for Windows Model (see Attachment )		
TRC Model Spreadsheet (see Attachment )		
Temperature Model Spreadsheet (see Attachment )		
Toxics Screening Analysis Spreadsheet (see Attachment )		
Water Quality Toxics Management Strategy, 361-0100-003, 4/06.		
Technical Guidance for the Development and Specification of Effluent Limitations, 362-0400-001, 10/97.		
Policy for Permitting Surface Water Diversions, 362-2000-003, 3/98.		
Policy for Conducting Technical Reviews of Minor NPDES Renewal Applications, 362-2000-008, 11/96.		
Technology-Based Control Requirements for Water Treatment Plant Wastes, 362-2183-003, 10/97.		
Technical Guidance for Development of NPDES Permit Requirements Steam Electric Industry, 362-2183-004, 12/97.		
Pennsylvania CSO Policy, 385-2000-011, 9/08.		
Water Quality Antidegradation Implementation Guidance, 391-0300-002, 11/03.		
Implementation Guidance Evaluation & Process Thermal Discharge (316(a)) Federal Water Pollution Act, 391-2000-002, 4/97.		
Determining Water Quality-Based Effluent Limits, 391-2000-003, 12/97.		
Implementation Guidance Design Conditions, 391-2000-006, 9/97.		
Technical Reference Guide (TRG) WQM 7.0 for Windows, Wasteload Allocation Program for Dissolved Oxygen and Ammonia Nitrogen, Version 1.0, 391-2000-007, 6/2004.		
Interim Method for the Sampling and Analysis of Osmotic Pressure on Streams, Brines, and Industrial Discharges, 391-2000-008, 10/1997.		
Implementation Guidance for Section 95.6 Management of Point Source Phosphorus Discharges to Lakes, Ponds, and Impoundments, 391-2000-010, 3/99.		
Technical Reference Guide (TRG) PENTOXSD for Windows, PA Single Discharge Wasteload Allocation Program for Toxics, Version 2.0, 391-2000-011, 5/2004.		
Implementation Guidance for Section 93.7 Ammonia Criteria, 391-2000-013, 11/97.		
Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers, 391-2000-014, 4/2008.		
Implementation Guidance Total Residual Chlorine (TRC) Regulation, 391-2000-015, 11/1994.		
Implementation Guidance for Temperature Criteria, 391-2000-017, 4/09.		
Implementation Guidance for Section 95.9 Phosphorus Discharges to Free Flowing Streams, 391-2000-018, 10/97.		
Implementation Guidance for Application of Section 93.5(e) for Potable Water Supply Protection Total Dissolved Solids, Nitrite-Nitrate, Non-Priority Pollutant Phenolics and Fluorides, 391-2000-019, 10/97.		
Field Data Collection and Evaluation Protocol for Determining Stream and Point Source Discharge Design Hardness, 391-2000-021, 3/99.		
Implementation Guidance for the Determination and Use of Background/Ambient Water Quality in the Determination of Wasteload Allocations and NPDES Effluent Limitations for Toxic Substances, 391-2000-022, 3/1999.		
Design Stream Flows, 391-2000-023, 9/98.		
Field Data Collection and Evaluation Protocol for Deriving Daily and Hourly Discharge Coefficients of Variation (CV) and Other Discharge Characteristics, 391-2000-024, 10/98.		
Evaluations of Phosphorus Discharges to Lakes, Ponds and Impoundments, 391-3200-013, 6/97.		
Pennsylvania's Chesapeake Bay Tributary Strategy Implementation Plan for NPDES Permitting, 4/07.		
SOP:		
Other:		







