pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

SOUTHWEST REGIONAL OFFICE
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0000647**
Facility Type	**Industrial**	APS ID	**804885**
Major / Minor	**Minor**	Authorization ID	**964898**

NPDES PERMIT FACT SHEET ADDENDUM

Applicant and Facility Information

Applicant Name	**ATI Powder Metals LLC**	Facility Name	**ATI Powder Metals Robinson**
Applicant Address	1000 Six PPG Place	Facility Address	6003 Campbells Run Road
	Pittsburgh, PA 15222		Pittsburgh, PA 15205
Applicant Contact	Lauren McAndrews	Facility Contact	Lauren McAndrews
Applicant Phone	412-394-2974	Facility Phone	412-394-2974
Client ID	277125	Site ID	469559
SIC Code	3399	Municipality	Robinson Township
SIC Description	Primary Metal Products	County	Allegheny
Date Published in PA Bulletin	March 5, 2022	EPA Waived?	Yes
Comment Period End Date	April 4, 2022	If No, Reason	N/A

Purpose of Application: Application for a renewal of an NPDES permit for discharge of treated Industrial wastewater and stormwater.

Internal Review and Recommendations

The first draft for this permit renewal cycle was issued on March 29, 2008. The Department received comments from the permittee on April 25, 2008 but did not proceed forward with issuing a final permit at that time. A review and response to those comments are addressed in the Public Notice Comments section of the Fact Sheet associated with the most current, second draft.

The second, most current draft was transmitted to the permittee on February 18, 2022 and was published in the PA Bulletin on March 5, 2022. The permittee submitted comments on March 10, 2022 following a phone discussion with the Department. Another comment was received on March 18, 2022. Those comments are provided below, along with the Department's response.

The Department proposes significant changes to the permit that will require another 30-day public comment period. The third draft will be submitted to the permittee following the close of the current comment period on April 4, 2022.

1) The temperature monitoring required after the initial three-year period is complete seems extremely onerous and will be very difficult to comply with. We understand this is because the designation of Campbells Run as the point of first use rather than Chartiers Creek. However, that determination was made at the Campbell's Run Sewage Treatment Plant, which is approximately 3.5 miles downstream from our discharge location. We discussed the fact that Campbells Run is culverted in part and that it may at times actually dry up, so it is not appropriate to designate the point of first use at our discharge and thus apply temperature limits based on the Thermal Discharge Limit Calc model. Please review this and determine if this permitted discharge can remain as is in the current permit (for temperature).

Approve	Return	Deny	Signatures	Date
X			Curt Holes, P.E. / Environmental Engineer	May 18, 2022
X			Michael E. Fifth, P.E. / Environmental Engineer Manager	June 13, 2022

Internal Review and Recommendations

DEP RESPONSE: The point of first use will remain at Campbells Run and not Chartiers Creek. Campbells Run is a Water of the Commonwealth with a designated use including Warm Water Fishes and aquatic life. The entire segment is to be protected for this use, including application of Water Quality Standards to meet the Water Quality Criterion. The temperature limits applicable for aquatic protection of only Chartiers Creek are not appropriate for Campbells Run.

2) The draft permit specifies quarterly sampling of stormwater discharge at Outfall 002. We discussed the General Stormwater permit monitoring requirements of semi-annual and whether this could in fact be used in lieu of quarterly. You seemed to indicate this could be reduced to semi-annual in the final permit. We are requesting this revision.

   DEP RESPONSE: The Department will reduce the sampling frequency of stormwater at Outfall 002 to semi-annual. Please note that Outfall 002 is representative of Outfall 003.

3) Chartiers Creek is listed on the DMRs included in the draft permit forms rather than Campbells Run. As we discussed, you were going to make these changes.

   DEP RESPONSE: The Department acknowledges the error in listing Chartiers Creek as the receiving water body on pages 1, 2, 3, 5, 6, and 7 of the draft permit and on the public notice. This has been corrected in this 3rd draft permit package.

4) The mercury sampling frequency at Outfall 101 is twice a month in the draft permit. The existing permit is 1/quarter. We request that this be reduced to 1/month as previously discussed.

   DEP RESPONSE: The mercury sampling frequency will remain twice per month. This will allow for a sufficient number of data points to better understand the release of mercury from the laboratory and below grade piping system in the building. When reviewing the updated sampling data after operations recommence, the permit engineer may choose to adjust the mercury sampling frequency at that time, or in the subsequent renewal. The permit requires that a Pollutant Reduction Report be submitted to the Department within 12 months of the discharge resuming since the prior Pollutant Reduction Report was compiled by Crucible Research, the former permittee. Similarly, the permit engineer may elect to modify the permit after review of the report.

5) The draft permit specifies twice per month oil and grease sampling at Outfall 001, the same as the existing permit. We request this be reduced to 1/month or even once per quarter as we discussed. ATI has not had any exceedances for this parameter at this outfall in the recent past.

   DEP RESPONSE: Refer to Comments 6 and 8 DEP RESPONSE, to address monitoring requirements for Oil and Grease at the facility.

6) The draft permit specifies twice per month oil and grease sampling at Outfall 101, the same as the existing permit. We request this be reduced to 1/month or even once per quarter as we discussed. ATI had only one permit exceedance for this parameter at this outfall in the last several years. The source of that exceedance was found, and changes were made to remove the oil and grease source that caused the exceedance.

   DEP RESPONSE: The frequency can be reduced to 1/month but will not be reduced to 1/quarter. Although the correction has been made to prevent a future recurrence, the presence of oil and grease as a pollutant of concern has been demonstrated and requires monitoring during this next permit cycle. The future renewal may consider a further reduction of sampling frequency if non-detections are maintained.

7) Page 24 of the draft permit, Section I, specifies processes that are contained in 40 CFR 471 for Metal Powder operations. As we discussed during our call on February 25, ATI does not have any discharges that are included in those referenced processes. We request that this Section be removed from the permit.

   DEP RESPONSE: This section has been removed. If operations at the facility are modified in the future and process wastewaters are produced subject to the 40 CFR Part 471 Subpart J ELG, this prohibition may be placed back in the permit.

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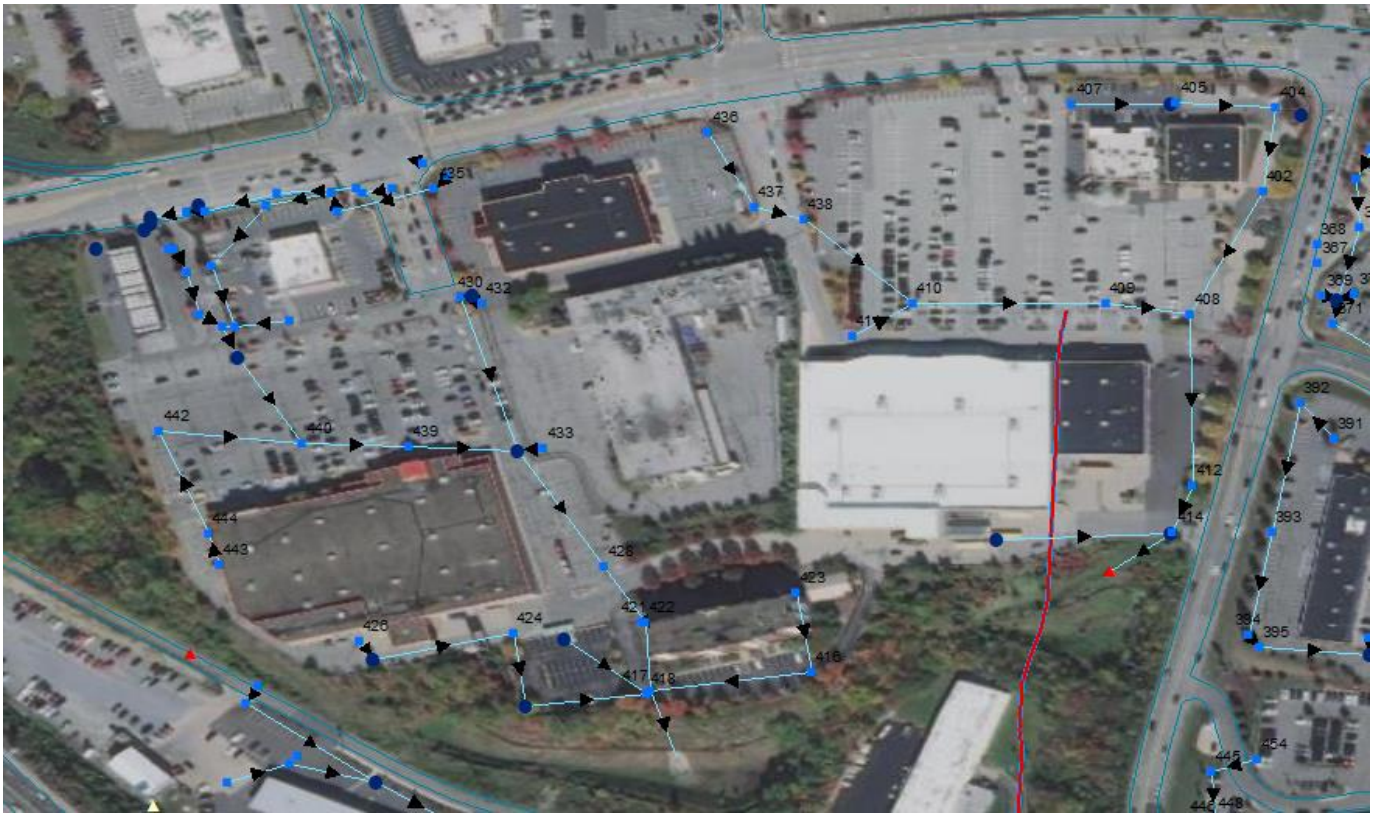
8) We do have one additional comment regarding the draft permit in reference to the temperature limits proposed for Outfall 101. We request this limit be applied at Outfall 001, rather than 101 which would be where the facility discharge actually enters Campbells Run. As I indicated in our call this afternoon, ATI is in the process of trying to confirm the discharge locations from the catch basin at the southeast corner of the parking lot as well as Outfall 001. We hope to have this completed within the next few weeks. We were able to obtain a map from Robinson Township (attached) that did confirm the discharge location of the catch basin at the southwest corner of the parking lot as going to the detention pond to the southwest of the facility as shown on the previous map we submitted to you.



DEP RESPONSE: The Department had temperature information available at IMP 201 and looked to implement temperature limitations at this internal point. After further review, the Department acknowledges that the temperature limitations are based on water quality criterion for the receiving water body, and as such should be applied at the primary outfall rather than at an internal monitoring point. Temperature data is not available at Outfall 001 at this time to appropriately determine thermal effluent limitations. The draft permit has been modified to impose the current 110 °F as the interim effluent limitations that are currently in effect but will require a sampling frequency of 2/week. This will allow the Department to gather sufficient data in order to determine seasonal impacts on Campbells Run. Some of the temperature criterion are for time periods as short as half a month. Since the facility has been dormant for a couple years and commencement of industrial activities is unknown at this time, the Part C Section II for the Temperature Schedule of Compliance will remain. Please note the requirement in Part C of the permit that the discharge "shall not cause a change in the stream temperature of more than 2°F in any one hour."

Preliminary results of the investigation of discharge locations and pathways for Outfall 001 as well as the catch basin (No. 433) in the southwest corner of the parking lot (Outfall 003) have revealed that stormwater from both Hobby Lobby and Kohl's comingles with the facility's discharge. The drainage areas of Hobby Lobby and Kohl's both consist of roof drains and parking area catch basins. With the comingling discharges that comprise Outfall 001, only temperature and flow monitoring requirements will be imposed at Outfall 001. Oil and Grease and pH will be continued to be monitored at IMPs 101 and 201.

9) DEP INITIATED: A comment the permittee had over the phone that was not captured in the formally submitted comments above was regarding the pH limit of IMP 101. This limit had been previously established based on BPJ

Internal Review and Recommendations

using the ELG limit of 7.5-10.0 as the basis. The facility is not subject to the ELG, but the previous permit engineer had determined all of the ELG should apply as a best practice since the pollutants present in the manufacturing process would be present in the laboratory wastewaters. The facility does not have any discharges from the manufacturing operation and only discharges small scale wastewater from the laboratory used to test the products. Treatment of some laboratory metals requires a pH set point of 8.2 S.U. and is then neutralized after settling. The DMR data in the 2nd draft fact sheet included a couple violations for low pH at IMP 101, presumably in an attempt to maintain the pH at Outfall 001. There were also a couple high pH values at Outfall 001 above pH 9 in 2020 due in part to the higher pH at IMP 101. The final discharge through Outfall 001 is limited to 6-9 S.U. to protect water quality.

Per the Clean Water Act's Section 402(o) regarding anti-backsliding "a permit may not be renewed, reissued, or modified on the basis of effluent guidelines promulgated under section 304(b) subsequent to the original issuance of such permit, to contain effluent limitations which are less stringent than the comparable effluent limitations in the previous permit. In the case of effluent limitations established on the basis of section 301(b)(1)(C) or section 303(d) or (e), a permit may not be renewed, reissued, or modified to contain effluent limitations which are less stringent than the comparable effluent limitations in the previous permit except in compliance with section 303(d)(4).

There are exceptions to this rule, including "(B)(i) information is available which was not available at the time of permit issuance (other than revised regulations, guidance, or test methods) and which would have justified the application of a less stringent effluent limitation at the time of permit issuance." It appears from the fact sheets that the permit writer of the currently effective permit believed the same treatment would be necessary for the laboratory wastewaters as the manufacturing process and did not individually examine the application of the 7.5-10 S.U. pH limitation using BPJ specific to this facility. More detailed information about the site's operations and treatment specifics has been made available to better evaluate the impact of the pH neutralization at IMP 101 on Outfall 001. A minimum 7.5 pH discharge at IMP 101 is not necessary to treat the laboratory wastewater and creates a greater potential at Outfall 001 to cause an exceedance.

The renewed permit will modify the pH at IMP 101 to 6-9.5 S.U. The 9.5 S.U. IMAX allows for some capacity in the pH setpoint of 8.2 S.U., but is a significant reduction in the concentration of free acid from 10.5 S.U. since the pH range is logarithmic.