pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

SOUTHWEST REGIONAL OFFICE
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0000892**
Facility Type	**Industrial**	APS ID	**585255**
Major / Minor	**Minor**	Authorization ID	**635342**

NPDES PERMIT FACT SHEET ADDENDUM

Applicant and Facility Information

Applicant Name	**Westinghouse Electric Co.**	Facility Name	**Westinghouse Electric Specialty Metals Plant Blairsville**
Applicant Address	559 Westinghouse Road Blairsville, PA 15717-4130	Facility Address	559 Westinghouse Road Blairsville, PA 15717-4130
Applicant Contact	Michael Christoforetti	Facility Contact	Adam Caldwell
Applicant Phone	724-459-4164	Facility Phone	724-459-4159
Client ID	145015	Site ID	245371
SIC Code	3356	Municipality	Derry Township
SIC Description	Manufacturing - Nonferrous Rolling And Drawing, NEC	County	Westmoreland
Date Published in PA Bulletin	June 15, 2024	EPA Waived?	No
Comment Period End Date	July 29, 2024	If No, Reason	Imposing TMDL for the first time
Purpose of Application	Renewal of NPDES Permit coverage.		

Internal Review and Recommendations

Notice of the Draft NPDES Permit was published in the Pennsylvania Bulletin on June 15, 2024. Westinghouse Electric Company (Westinghouse) requested a 15-day extension of the public comment period. The Department granted the 15-day extension and the comment period expired on July 29, 2024. The Department received ten (10) comments from Westinghouse Electric Co. and three (3) comments from the United States Environmental Protection Agency (EPA) during the draft permit comment period. The comments are summarized below. A copy of Westinghouse's comments in Attachment A of this Fact Sheet Addendum. The Department has made changes to the Draft permit due to these comments. The Department is redrafting the permit because of these changes made to the Draft Permit. The changes are described in the Department's response to the comments and then summarized later in this fact sheet addendum.

EPA Comments and the Department's Response:

EPA Comment One:

Some of the ELG standards noted in Attachment D of the fact sheet aren't equivalent to the technology-based standards in the ELG. Please evaluate any revisions to the TBELs and permit limits that may be necessary:

- 471.91(h) – the maximum for any 1 day for Oil and Grease is 6.8, while the fact sheet indicates 9.8.
- 471.92(h) – the maximum for monthly average for Chromium is 0.061, while the fact sheet indicates 0.062.
- 471.91/92(t) – maximum for any 1 day for Nickel is 0.030, while the fact sheet indicates 0.3.

Approve	Return	Deny	Signatures	Date
X			Adam Olesnanik, P.E. / Environmental Engineer	September 4, 2024
X			Michael E. Fifth, P.E. / Environmental Engineer Manager	September 5, 2024

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- EPA questions the value highlighted below for the calculation (page 37 of the fact sheet) used to derive the TBELs. While the calculated TBELs appear correct, this portion of the calculation seems to be in error:

*Mass-Based Effluent Limit (lbs/day) = [ELG Max for any 1 day (lbs/1,000,000 lbs production)] * [Average Daily Production (1,000,000 lbs production)]*
*Chromium Max Daily (lbs/day) = (0.15 lbs/1,000,000 lbs production) * [((3,000,000 lbs/yr) * 1 yr/12 months) * (1 month/21 days) / (1,000,000 lbs production)]*

The Department's Response to EPA Comment One:

The Department has reviewed the ELG standards and agrees with EPA that some of the numbers used are incorrect.

For 471.91(h), the Department used 9.8 instead of 6.8 for the maximum for any 1 day for Oil and Grease. This was a typographical error. The maximum for any 1 day for Oil and Grease has been revised to be 6.8 to reflect what is actually in 471.91(h). The mass-based limitation calculations have been revised; however, this correction did not change the mass-based daily maximum limitation for Oil and Grease. The revised mass-based calculations are in Attachment B of this Fact Sheet Addendum. No changes were made to the Second Draft Permit due to this comment.

For 471.92(h), the Department used 0.062 instead of 0.061 for the maximum for monthly average for Chromium. This was a typographical error. The maximum for average monthly for Chromium has been revised to be 0.061 to reflect what is actually in 471.92(h). The mass-based limitation calculations have been revised; however, this change did not change the mass-based monthly average limitation for Chromium. No changes were made to the Second Draft Permit due to this comment.

For 471.91/92(t), the Department used 0.3 instead of 0.030 for the maximum for any 1 day for Nickel. This was a typographical error. The maximum for any 1 day for Nickel has been revised to be 0.03 to reflect what is actually in 471.91/92(t). The mass-based limitation calculations have been revised; the mass-based daily maximum limitation for Nickel has been changed from 0.454 lbs/day to 0.453 lbs/day. The mass-based daily maximum limitation for Nickel has been changed due to this comment.

The sample calculation included the */ (1,000,000 lbs production* at the end of the calculation to convert the production in the terms that the ELG limitations uses. In the unit for *ELG Max for any 1 day (lbs/1,000,000 lbs production)* the */1,000,000 lbs production* is a unit and not a factor in the equation. To avoid confusion the */1,000,000 lbs production* has been changed to per million off-lbs production. The updated sample calculation is as described below. No changes were made to the Second Draft Permit due to this comment.

$$Mass - Based\ Effluent\ Limit\ \left(\frac{lbs}{day}\right) =$$
$$\left[ELG\ Max\ for\ any\ 1\ day\ \left(\frac{lbs}{million\ off - lbs\ production}\right)\right] * \left[Average\ Daily\ Production\ \left(\frac{million\ off - lbs\ production}{day}\right)\right]$$

$$Chromium\ Max\ Daily\ Mass - Based\ Effluent\ Limit\ \left(\frac{lbs}{day}\right) =$$
$$\left[\left(\frac{0.15\ lbs}{million\ off - lbs\ production}\right)\right] * \left[\left(\frac{3{,}000{,}000\ off - lbs\ production}{year}\right) * \left(\frac{1\ year}{12\ month}\right) * \left(\frac{1\ month}{21\ day}\right) * \left(\frac{1\ million\ off - \ lbs\ production}{1{,}000{,}000\ off - lbs\ production}\right)\right]$$

$$Chromium\ Max\ Daily\ Mass - Based\ Effluent\ Limit\ \left(\frac{lbs}{day}\right) =$$
$$0.0018\ \left(\frac{lbs}{day}\right)$$

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EPA Comment Two:

Regarding the Kiskiminetas-Conemaugh TMDL:

- For IMP 101, EPA recommends that PADEP impose the WLA in lbs/yr in the effluent limitation pages in addition to the concentration-based limits. Monthly/daily loadings could be reported, while the annual WLA could be an annually calculated value to document that the discharge is meeting the TMDL WLA.

- Regarding the IMP 101 compliance schedule discussion in the fact sheet - a schedule of compliance should only be afforded (amongst other considerations) when a facility is not able to comply with the final limits. The FS indicates that the system utilized for the wastewater treatment that discharges via IMP 101 should be able to achieve the limits and limited data indicates the facility may be able to comply now. Has the facility indicated that it will not be able to achieve the new WQBELs? If compliance can be met at permit issuance, no schedule should be granted (40 CFR 122.47(a)(1) requires compliance "as soon as possible").

The Department's Response to EPA Comment Two:

As described on page 15 in the draft permit fact sheet, the Allocated Loads listed in Appendix G were not imposed because the load unit is pounds per year, which can make it difficult to report and gage compliance in monthly DMRs. Therefore, for the ease of compliance, only the Allocated Concentration from Appendix G were proposed. The Department believed that this would satisfy the TMDL requirements because the loads that were calculated in the TMDL were based on the Discharge flow (at the time the TMDLs were developed) and the allocated discharge concentrations. However, based on EPA's recommendation, the Department will also impose the loading limits. Annual loading limit for Aluminum, Iron, and Manganese will be imposed. The limits are derived from Appendix G of the Kiskiminetas-Conemaugh TMDL. The allocated annual load for total Aluminum is 256 lbs/yr, for total iron is 512 lbs/yr, and for total manganese is 341 lbs/yr. A monthly total loading reporting requirement will be imposed for Aluminum, Iron, and Manganese to aid in the calculation of the annual load. Loading monitoring and limitations for Aluminum, Iron, and Manganese have been added to the Second Draft Permit due to this comment.

The Department provided Westinghouse with a pre-draft NPDES permit on August 8, 2022. In the pre-draft, the Department did not include a compliance schedule for the TMDL parameters. In response to this, Westinghouse requested that a compliance schedule to be added to the draft permit for the TMDL parameters. Westinghouse's justification to include a compliance schedule was because no limits were previously imposed for these TMDL parameters at IMP 101 and the Facility has not yet had the opportunity to collect sufficient data to determine whether these newly proposed limits can be achieved. Westinghouse requested a five-year schedule of compliance. The Department agreed with Westinghouse that there may not be sufficient data to determine if the site can achieve these new limits upon permit issuance; however, the Department did not believe that a five-year schedule of compliance was warranted. In the Draft Permit, the Department proposed a two-year schedule of compliance, believing that two years was reasonable because it is very likely that the current treatment system will be able to achieve these new limitations with little to no additional technology. However, one of Westinghouse's comments on the Draft Permit (Westinghouse's Comment Five) was a request to change the schedule of compliance from two year to three years. The Department's response to this request is discussed in more detail below in the Department's Response to Westinghouse's Comment Five. No changes were made to the Second Draft Permit due to this comment.

EPA Comment Three:

Regarding TCE:

- For IMP 301 the TMS shows that there is no RP for TCE, but it is noted that a "zero" stream concentration was used in modeling. Considering the historic contamination at this site, EPA questions the appropriateness of assuming a zero discharge in the receiving water for TCE. Has the facility or PADEP collected any ambient data for TCE in the receiving water?

- It is noted that the BPJ limit of 0.072 mg/L (or 72 ug/L) that was previously derived is imposed at IMP 301. While the TMS analysis indicates there is no RP for TCE, since TCE is a pollutant of concern PADEP needs to determine whether limits may be needed to prevent an excursion of water quality standards. The BPJ TBEL could be used in the RPA to determine whether it is sufficient to address water quality. Below is an excerpt from Section 6.2.1.1 of the Permit

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Writer's Manual to explain the expectation to ensure that the limit imposed for TCE addresses any applicable technology and water quality-based requirements:

> 6.2.1.1 Pollutants with Applicable TBELs
> One category of pollutants of concern includes those pollutants for which the permit writer has developed TBELs based on national or state technology standards or on a case-by-case basis using best professional judgment. By developing TBELs for a pollutant, the permit writer has already determined that there will be some type of final limitations for that pollutant in the permit and must then determine whether more stringent limitations than the applicable TBELs are needed to prevent an excursion above water quality standards in the receiving water (see Exhibit 6-1 above). A permit writer can determine whether the TBELs are sufficiently protective by either proceeding to calculate WQBELs as described in section 6.4 below and comparing them to the TBELs or by assuming that the maximum daily TBEL calculated is the maximum discharge concentration in the water quality assessments described in section 6.3 below.

- The fact sheet discusses that the current permit and this draft permit authorize the discharge of uncontaminated stormwater from outfall 002. However, based on the fact sheet discussions, stormwater discharges from 002 have historically discharged stormwater contaminated with TCE, which is still apparent in current data from 2020. The fact sheet states that stormwater and dry weather samples at outfall 002 all contain TCE at levels significantly higher than the most stringent water quality criterion (Human Health, 0.6 ug/L), but the draft permit only imposes a benchmark value for TCE, and the fact sheet states that if the permittee continues to discharge TCE above detection levels then limitations may be imposed in the future. However, according to the fact sheet discussion TCE discharge levels are already exceeding the benchmark value and have been for years. Providing additional time to continue demonstrating these exceedances does not seem appropriate. Instead, a requirement to implement corrective actions and limitations should be imposed in the draft permit to address the contaminated stormwater discharges. The discharges from 002 may demonstrate RP for TCE and if so, WQBELs should be imposed in the permit in accordance with 40 CFR 122.44(d)(1)(iii).

<u>The Department's Response to EPA Comment Three:</u>

At this point in time the Department does not have instream data for TCE. However, it should be noted that the historic contamination at this site would not contribute to background data in the stream. When conducting a water quality analysis, the Department would use the upstream background data, if available. The historic discharge from the site would not contribute to instream concentrations upstream from the discharge. Therefore, the historical discharge of TCE from the site would not be used to assume that TCE is present upstream of the discharge. TCE is not a naturally occurring pollutant, so when the Department conducts a water quality analysis, if no upstream data is available, the Department assumes the upstream concentration is zero. No changes were made to the Second Draft Permit due to this comment.

The Department understands EPA's concern related to the BPJ limit for TCE and whether or not it is protective of the water quality standards. The TMS was run for the discharge from IMP 301 using the BPJ technology limitation for the TCE discharge concentration, included in Attachment C. TMS calculated the WQBEL for TCE to be 10.7 mg/L, which is less stringent than the BPJ limitation. Therefore, the BPJ Technology limitation is protective of the water quality. No changes were made to the Second Draft Permit due to this comment.

Outfall 002 is a stormwater outfall with a small portion of groundwater. Typically, water quality analyses are performed under low-flow (Q7-10) conditions. Stormwater discharges occur at variable rates and frequencies but not however during Q7-10 conditions, which is why the water quality analyses wasn't preformed for the discharge from Outfall 002. However, because a portion of the discharge is groundwater, there is a dry weather discharge flow from Outfall 002. The Department conducted water quality analyses for Outfall 002 using the dry weather discharge flow that Westinghouse calculated in November of 2021 2 gpm (0.00288 MGD) and the maximum reported concentration of TCE from Outfall 002 (25 ug/L). The TMS for Outfall 002 is in Attachment D of this Fact Sheet Addendum. The TMS calculated that the WQBEL for TCE at Outfall 002 to be 36.3 mg/L. Based on the results from the TMS, there is no RP for TCE at Outfall 002, i.e. the discharge concentration is less than 25% of the WQBEL. No changes were made to the Second Draft Permit due to this comment.

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Westinghouse's Comments and the Department's Response

Westinghouse's Comment One:

Part A; I.B & I.C IMP 101 – The proposed Monthly Average and Daily Maximum Concentration-based effluent limits for Oil and Grease are not appropriate under applicable regulations and should be removed and replaced with the current limits.

The Department's Response to Westinghouse's Comment One:

The Department acknowledges Westinghouse's comment; however, the Department disagrees with Westinghouse and believes that the proposed Oil and Grease limitations are appropriate. The Department agrees that 40 CFR 471 imposes loading limitations and not concentration limits; however, the Department may impose the concentration limitations per 40 CFR 122.45 (f) (2); Pollutants limited in terms of mass additionally may be limited in terms of other units of measurement, and the permit shall require the permittee to comply with both limitations.

As discussed in the Draft Permit Fact Sheet, the concentration limitations for oil and grease (and for Total Suspended Solids, Chromium, Cyanide, Fluoride, Nickel, and Ammonia) are derived from Table VII-21 from the Nonferrous Metals Forming and Metal Powders Point Source Category Development document. The concentrations used to develop the ELGs for the Zirconium-Hafnium Forming Subcategory are based upon the BAT model treatment technology consisting of Lime, Settling and Filtration. These concentrations are being proposed because the production-based limitations are based on an anticipated average annual production and not actual production values. The anticipated annual production values that Westinghouse provided are greater than the actual average annual production values and greater than any of the annual production values from the past five years. By using an anticipated average annual production that is greater than actual production values, Westinghouse will receive additional, unsubstantiated loading that may not be accurate or consistent with the loading that the site should receive. By imposing concentration limitations, in addition to mass-based limiting, DEP is assured that the site will meet the treatment effectiveness requirements of the BAT model treatment technology required by 40 CFR 471, regardless of future production values.

No Changes were made to the Second Draft Permit due to this comment.

Westinghouse's Comment Two:

Part A; I.B & I.C IMP 101 – The proposed Monthly Average, Daily Maximum, and Instantaneous Maximum concentration-based effluent limits for Outfall 101 for Total Suspended Solids, Chromium, Cyanide, Fluoride, Nickel, and Ammonia are not appropriate under applicable regulations and should be removed.

The Department's Response to Westinghouse's Comment Two:

See the Department's response to Westinghouse's Comment One. Additionally, the majority of the concentration limitations that were proposed in the Draft Permit were concentration limitations in the previous permit and can be carried forward in pursuit to EPA's anti-backsliding regulation, 40 CFR 122.44(l). Furthermore, the Department does not believe that limitations were impose improperly and these limitations are still applicable to IMP 101 based on the same reasoning as described in the Department's response to Westinghouse comment one. No changes were made to the Second Draft Permit due to this comment.

Westinghouse's Comment Three:

Part A; I.B & I.C IMP 101 – Monitoring requirements and effluent limitations for Total Residual Chorine at IMP 101 should not be included in the Draft Permit because chlorination is not used at the Facility.

The Department's Response to Westinghouse's Comment Three:

The Department acknowledges Westinghouse's comment and agrees with Westinghouse that TRC limitations should not have been included at IMP 101 in the Draft Permit. The TRC limitations should not have been included in the Draft Permit because chlorine/chlorination is not used in the process or treatment of wastewater at IMP 101 and the IMP is not currently limited for TRC. This was a typographical error and the limitations will be removed from the Second Draft Permit.

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Westinghouse's Comment Four:

Part A; I.B. & I.C & Part C; III.A. IMP 101 – The effluent limitations for Aluminum, Iron, and Manganese at IMP 101 should be revised to be consistent with mass-based Waste Load Allocations in the TMDL.

The Department's Response to Westinghouse's Comment Four:

Westinghouse has requested that the concentration limits for Aluminum, Iron, and Manganese at IMP 101 be changed per the table below. Westinghouse's requested concentration limitations were calculated by using the Mass-Based Wasteload Allocations from the TMDL and a discharge flow rate of 0.090 MGD.

Parameter	Draft Permit Proposed Concentration (mg/L)		Westinghouse's Requested Concentration (mg/L)	
	Average Monthly	Maximum Daily	Average Monthly	Maximum Daily
Aluminum, total	0.75	0.75	0.93	0.93
Iron, total	1.5	3.0	1.87	3.74
Manganese, total	1.0	2.0	1.24	2.49

The Department cannot accept Westinghouse's calculated concentrations limits because they are not consistent with the allocated concentration from the TMDL. The TMDL allocates load and concentration limitations, see table below from Appendix G. The concentrations proposed in the Draft Permit are the allocated concentrations from the TMDL.

Kiskiminetas River Watershed Major Non-Mining Wasteload Allocations

Region	SWS	PERMIT	PIPE	Metal	Baseline Load (lbs/yr)	Baseline Concentration (mg/L)	Allocated Load (lbs/yr)	Allocated Concentration (mg/L)	% Reduction	Comments
4	4002	PA0000892	101	Aluminum	365	1.07	256	0.75	30	
4	4002	PA0000892	101	Iron	512	1.50	512	1.50	0	
4	4002	PA0000892	101	Manganese	341	1.00	341	1.00	0	

No changes were made to the Second Draft Permit due to this comment. Note, as discussed above in EPA comment Two, the Load Allocations have been added to the Second Draft Permit.

Westinghouse's Comment Five:

Part A; I.B. & I.C & Part C; III.A. IMP 101 – The compliance schedule for Aluminum, Iron, and Manganese at IMP 101 should be extended to three years after the Permit Effective Date.

The Department's Response to Westinghouse's Comment Five:

The Department acknowledges Westinghouse's request and has revised the schedule of compliance so that the Final effluent limitations for Total Aluminum, Total Iron, and Total Manganese will become effective three years after the Permit Effective date. The effective periods for the interim and final limitations of IMP 101 have been changed to reflect the three-year Schedule of Compliance. An additional action item has been added to Part C. II. requiring the permittee to submit a progress report one year after Permit Effective Date. The due/begin data for the action items in Part C. II. have been revised to reflect the change from a two-year schedule of compliance to a three-year schedule of compliance.

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Westinghouse's Comment Six:

Part A; I.B & I.C IMP 101 – The IMAX for Total Suspended Solids was decreased unnecessarily and should be eliminated or remain as 30 mg/L.

The Department's Response to Westinghouse's Comment Six:

See the Department's response to Westinghouse's Comment One. The TSS IMAX limitations was revised to reflect the concentration from Table VII-21 from the Nonferrous Metals Forming and Metal Powders Point Source Category Development document.

Additionally, the Department would like to note that the IMAX limitation for TSS is imposed to allow for a grab to be collected by the appropriate regulatory agency to determined compliance. Westinghouse is not required to monitor for the instantaneous maximum limitations. However, if grab samples are collected by the Westinghouse, the results must be reported.

No changes were made to the Second Draft Permit due to this comment.

Westinghouse's Comment Seven:

Part A; I.D & I.E 201 – the Dissolved Oxygen limit for IMP 201 should be removed from the Draft Permit because it is not required. Alternatively, the Compliance Schedule should be modified to extend the deadline for the implementation of changes to achieve effluent limitation to three years after the Permit effective date.

The Department's Response to Westinghouse's Comment Seven:

The Department acknowledges Westinghouse's comment; however, disagrees with Westinghouse's justification to not include the Dissolved Oxygen limitation. The minimum limitation of 4.0 mg/L for DO is based on a Best Professional Judgement Technology Based Effluent Limitation which the Department imposes on all sewage discharges. Westinghouse states that due to the low volume from IMP 201, the discharge cannot reasonably be anticipated to have an adverse impact on the Dissolved Oxygen concentration of the Conemaugh River, therefore the limit is unnecessary. The DO limitation is based on a Best Professional Judgement Technology Limitation and considerations of whether or not the discharge would have an adverse effect on the receiving stream aren't relevant to the imposition of the limitation, i.e. the limitation is not based on Water Quality Standards.

The Department has revised the schedule of compliance so that the Final effluent limitations for Dissolved Oxygen will become effective three years after the Permit Effective date. The effective periods for the interim and final limitations of IMP 201 have been changed to reflect the three-year Schedule of Compliance. An additional action item has been added to Part C. III. requiring the permittee to submit a progress report one year after Permit Effective Date. The due/begin data for the action items in Part C. II. have been revised to reflect the change from a two-year schedule of compliance to a three-year schedule of compliance.

Westinghouse's Comment Eight:

Part C; V.F.7 & V.G Outfall 002 – The imposition of a 0.5 microgram per liter benchmark for Trichloroethylene for Outfall 002 is unnecessary and should be deleted from the Draft Permit. In the alternative, and if triggered by benchmark exceedances, Westinghouse will develop a Corrective Action Plan, as proposed, but with the understanding that further pollutant reductions may not be technologically available and economically practicable and/or necessary to prevent stormwater discharge from causing or contributing to an exceedance of applicable water quality standard for the Conemaugh River. Westinghouse further requests that the sampling location for Outfall 002 should be moved to the end of the facility property boundary.

The Department's Response to Westinghouse's Comment Eight:

The Department acknowledges Westinghouse's comment but disagrees with the claim that the benchmark value is unnecessary. The Benchmark Value that was included in the Draft Permit is not based on water quality standards or the likelihood of Westinghouse to contribute to an exceedance of the water quality standards in the receiving stream, but based on evidence showing that operations at the Specialty Metals Plant are contributing to the contamination of stormwater. As

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described in the Draft Permit Fact Sheet, the Benchmark value of 0.5 µg/L was proposed in the Draft Permit because TCE is not a naturally occurring pollutant, and detections in the discharge indicate that operations at the Specialty Metals Facility are contributing to the contamination of stormwater. The Benchmark value of 0.5 µg/L was chosen because 0.5 µg/L is the Department's Quantitation Limit (QL) for TCE. The QL was chosen because it is the most sensitive level that a laboratory can detect TCE in a sample. Therefore, if TCE is reported as non-detect at the Department QL, the Department will presume that the stormwater is not contaminated by TCE. Detections above the QL would indicate that the groundwater/stormwater is contaminated. As described in the Draft Permit Fact Sheet, Benchmark Values are not effluent limitation and exceedances of the Benchmark are not considered to be violations of the NPDES permit. 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 provides permittees with an indication that the facility's controls may not be sufficiently controlling pollutants in stormwater. The exceedance of the benchmark and the presence of TCE in the discharge may be an indicator that the groundwater remediation treatment/collection system that discharges via IMP 301 is not operating as designed, and the contaminated groundwater is not being collected or infiltrating the storm sewer network/discharge pipe of Outfall 002.

Additionally, per Part C.V.G.1.b. and Part C.V.G.1.c of the Second Draft Permit, Westinghouse's understanding that a CAP may not be required if Westinghouse can prove that further pollutant reductions may not be technologically available and economically practicable and/or necessary to prevent stormwater discharge from causing or contributing to an exceedance of applicable water quality standard for the Conemaugh River is correct.

The Department acknowledges Westinghouse's request to relocate the sampling location for Outfall 002 and agrees with Westinghouse's claims. The point of compliance, or the sampling point, for Outfall 002 doesn't need to be at the end of the discharge pipe and can be at the point where the discharge from Outfall 002 enters the Conemaugh River via the drainage swale/storm channel. Westinghouse may sample the discharge from Outfall 002 in the drainage swale at the end of the Facility property for the sampling requirements of Outfall 002. The sampling location in Part A for Outfall 002 in the Second Draft permit will be changed from "at Outfall 002" to "at the end of the site property, in the drainage swale that conveys the discharge from Outfall 002 to the Conemaugh River."

Westinghouse's Comment Nine:

Part C; IV – The chemical additives requirements should be removed or, in the alternative, should be clarified to identify that these requirements do not apply to wastewater treatment chemicals.

The Department's Response to Westinghouse's Comment Nine:

The Department understands Westinghouse's concerns related to the Chemical Additives requirements in the Draft Permit; however, finds Westinghouse's request is unwarranted. The Department understands that at this point in time, Westinghouse may not use any chemical additives, but has determined to retain the Part C condition in the Second Draft Permit just in case Westinghouse does decide to use any chemical additives in the future; this way a permit amendment will not be required to include the condition in the future. If Westinghouse continues to not use any chemical additives, then the Part C condition and requirements would not be applicable. Additionally, the Part C condition does not need to be revised to include the exemption for wastewater treatment chemicals as chemical additives because the definition of Chemical Additive in Part A.II includes the following statement, *"The term generally excludes chemicals used for neutralization of waste streams, the production of goods, and treatment of wastewater."* No changes were made to the Second Draft Permit due to this comment.

Westinghouse's Comment Ten:

Certain typographical/administrative errors in the Draft Permit should be corrected. Part C; V.D.2; Paragraphs V.D.2.l to V.D.2.q. pertaining to routine inspections, are improperly lettered and should be V.D.2.a to V.D.2.f. Part C; V.G; the section pertaining to the Corrective Action Plan in Part C is improperly labeled as V.A, but should be V.G.

The Department's Response to Westinghouse's Comment Ten:

The Department agrees with Westinghouse that there are some numbering typographical errors in Part C.V. of the Draft Permit. These typographic errors will be corrected in the Second Draft Permit.

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Part C.V.D.2.I through Part C.V.D.2.q in the Draft Permit has been changed to Part C.V.D.2.a through Part C.V.D.2.f in the Second Draft Permit.

Part C.V.A regarding the Corrective Action Plan requirements in the Draft Permit has been changed to Part C.V.G in the Second Draft Permit.

Department Initiated Changes:

During the Review of the Second Draft permit, the Department determined there was a typographical error in the IMAX limitation for Fluoride in Part A of the Draft Permit for the interim limitations for IMP 101. Footnote 3 should have been included for the interim IMAX limitation for Fluoride at IMP 101. Footnote 3 has been added to the interim IMAX limitation for Fluoride at IMP 101 in Part A of the Second Draft Permit.

Summary and Recommendations:

The effective period for the interim limits at IMP 101 has been changed to Permit Effective Date through Three Years After Permit Effective Date.

The effective period for the final limits at IMP 101 has been changed to Three Years After Permit Effective Date through Permit Expiration Date.

The mass-based daily maximum limitation at IMP 101 for Nickel has been changed from 0.454 lbs/day to 0.453 lbs/day.

A monthly total reporting requirement has been added to IMP 101 for Total Aluminum, Total Iron, and Total Manganese.

A total annual load limit of 256 lbs/yr has been added to IMP 101 for Total Aluminum.

A total annual load limit of 512 lbs/yr has been added to IMP 101 for Total Iron.

A total annual load limit of 341 lbs/yr has been added to IMP 101 for Total Manganese.

The limitations for total residual chloride have be removed from IMP 101 in the Second Draft permit.

Footnote 3 has been added to the interim IMAX limitation for Fluoride at IMP 101 in Part A of the Second Draft Permit.

The effective period for the interim limits at IMP 201 has been changed to Permit Effective Date through Three Years After Permit Effective Date.

The effective period for the final limits at IMP 201 has been changed to Three Years After Permit Effective Date through Permit Expiration Date.

The sampling location in Part A for Outfall 002 has been changed to “at the end of the site property, in the drainage swale that conveys the discharge from Outfall 002 to the Conemaugh River” in the Second Draft Permit.

Part C.II.A.1 has been added to the Second Draft Permit, requiring the permittee to submit a Progress Report one year after the Permit Effective Date.

Part C.II.A.1 of the Draft Permit has been renumbered as Part C.II.A.2. in the Second Draft Permit.

The due date for Part C.II.A.2. in the Second Draft Permit has been changed to Two Years After Permit Effective Date.

Part C.II.A.2 of the Draft Permit has been renumbered as Part C.II.A.3. in the Second Draft Permit.

The begin date for Part C.II.A.3. in the Second Draft Permit has been changed to Two Years After Permit Effective Date.

Part C.II.A.3 of the Draft Permit has been renumbered as Part C.II.A.4. in the Second Draft Permit.

Internal Review and Recommendations

The due date for Part C.II.A.4. in the Second Draft Permit has been changed to Three Years After Permit Effective Date.

Part C.III. A.1 has been added to the Second Draft Permit, requiring the permittee to submit a Progress Report one year after the Permit Effective Date.

Part C.III. A.1 of the Draft Permit has been renumbered as Part C.III. A.2. in the Second Draft Permit.

The due date for Part C.III. A.2. in the Second Draft Permit has been changed to Two Years After Permit Effective Date.

Part C.III. A.2 of the Draft Permit has been renumbered as Part C.III. A.3. in the Second Draft Permit.

The begin date for Part C.III. A.3. in the Second Draft Permit has been changed to Two Years After Permit Effective Date.

Part C.III. A.3 of the Draft Permit has been renumbered as Part C.III. A.4. in the Second Draft Permit.

The due date for Part C.III. A.4. in the Second Draft Permit has been changed to Three Years After Permit Effective Date.

Part C.V.D.2.I through Part C.V.D.2.q in the Draft Permit has been changed to Part C.V.D.2.a through Part C.V.D.2.f in the Second Draft Permit.

Part C.V.A regarding the Corrective Action Plan requirements in the Draft Permit has been changed to Part C.V.G in the Second Draft Permit.

No other changes were made to the Second Draft Permit.

The Department has determined that the NPDES permit will need to be re-drafted due to the changes made to the Draft permit.

The site was last inspected on March 8, 2022; no violations were noted. The Permittee has no open violations.

Second 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.

Attachment A:

Westinghouse Electric Company’s Comments on the Draft Permit

Westinghouse Electric Company
Nuclear Fuel
559 Westinghouse Road
Blairsville, Pennsylvania 15717
USA

Mr. Adam Olesnanik
PA Dept of Environmental Protection
Southwest Regional Office
400 Waterfront Drive
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July 26, 2024

Subject: **Comments on Draft NPDES Permit No. PA0000892**

Reference: Westinghouse Electric – Specialty Metals Plant – Blairsville, PA
Authorization ID No. 635342
Derry Township, Westmoreland County

Dear Mr. Olesnanik:

Westinghouse Electric Company LLC (Westinghouse) herein provides comments to the Pennsylvania Department of Environmental Protection (the Department) on Draft NPDES Permit No. PA0000892 (Draft Permit) for the Westinghouse Electric Specialty Metals Plant (SMP) (Facility) located in Blairsville, Pennsylvania. The Draft Permit was published in the *Pennsylvania Bulletin* on June 15, 2024, and the public comment period regarding the Draft Permit was originally to close on July 15, 2024. However, as allowed by 25 Pa. Code § 92a.82(d), on July 9, 2024, the Department granted Westinghouse a 15-day extension to the public comment period, until July 29, 2024. The current permit was issued in 2001 and has been administratively extended since it expired in 2006.

The Department provided a pre-draft permit to Westinghouse for preliminary review in 2022 (Pre-Draft Permit). Westinghouse submitted comments to the Pre-Draft Permit on September 9, 2022. We appreciate your consideration of those comments in the Department's drafting of the Draft Permit.

COMMENT NO. 1: Part A; I.B & I.C IMP 101 – The proposed Monthly Average and Daily Maximum concentration-based effluent limits for Oil and Grease are not appropriate under applicable regulations and should be removed and replaced with the current limits.

The Draft Permit includes both loading and concentration limits for Oil and Grease at Internal Monitoring Point (IMP) 101. The proposed Average Monthly and Daily Maximum concentration limits in the Draft Permit are the same – 10 milligrams per liter (mg/L). The Department references the effluent limitation guidelines (ELGs) of 40 C.F.R. Part 471 (Nonferrous Metals Forming and

Metal Powders Point Source Category) as the basis for imposing these Oil and Grease limitations. Page 12 of the Fact Sheet states, "along with the mass-based limitations calculated from production data, concentrations from Table VII-21 from the Nonferrous Metals Forming and Metal Powders Point Source Category Development document (Development Document) will be imposed at IMP 101." Specifically, Table 2 of the Fact Sheet identifies 10 mg/L as being one of the "Technology Limits from ELGs."

Westinghouse acknowledges that IMP 101 is subject to the ELGs of 40 C.F.R. Part 471, Subpart I (Zirconium-Hafnium Forming Subcategory). However, there are no concentration-based ELGs imposed for the Zirconium-Hafnium Forming subcategory. Therefore, the 10 mg/L limits should not be imposed for IMP 101.

The following excerpts from the Development Document make clear that the U.S. Environmental Protection Agency (EPA) intended ELGs for the Nonferrous Metals Forming and Metal Powders Point Source Category to be mass-based and calculated in light of production:

1. "After examining the various treatment technologies, the Agency has identified BPT [best practicable technology] to represent the average of the best existing technology. EPA is promulgating mass limitations based on model end-of-pipe treatment which consists of oil skimming, lime precipitation and sedimentation technology." Page 4 (emphasis added).

2. "Pollutant discharge limitations for this category are expressed as mass loadings, i.e., allowable mass of pollutant discharge per off-kilogram of production (mg/off-kg). Mass loadings were calculated for each operation (building block) within each subcategory. The mass loadings were calculated by multiplying the BPT regulatory flow (l/off-kg) for the operation by the effluent concentration achievable by the BPT treatment technology (mg/l). Table VII-21 presents the effluent concentrations achievable by the BPT model treatment train for the pollutants regulated in each subcategory." Pages 1555-1556 (emphasis added).

Westinghouse does not contest the mass-based limitations for Oil and Grease that have been proposed for IMP 101. However, no concentration-based limitations are promulgated in the applicable ELG category; therefore, these limits are not applicable and should be removed from the Draft Permit.

As the Fact Sheet states, "discharges from IMP 101 are subject to effluent standards for oil and grease from 25 Pa. Code 95.2(2)" (i.e., 15 mg/l as a daily average value and 30 mg/l at any time). Westinghouse requests that the current Average Monthly and Instantaneous Maximum limitations remain unchanged, which are consistent with the state treatment standards at 25 Pa. Code § 95.2(2)(ii). These limits are also consistent with the Department's "Standard Operating Procedure for Clean Water Program Establishing Effluent Limitations for Individual Industrial Permits," Standard Operating Procedure (SOP) No. BPNPSM-PMT-032, as revised February 5, 2024, Version 1.7, which states, "In general, if the maximum concentration of Oil and Grease in the discharge is 4 mg/L or greater, establish a monitor only requirement. If the maximum concentration of Oil and Grease in the discharge is 8 mg/L or greater, establish an effluent limitation for Oil and Grease of 15 mg/L as an average monthly limit and 30 mg/L as an

instantaneous maximum (IMAX) limit." Page 2. As such, the IMP 101 effluent limitations for Oil and Grease should remain unchanged. To avoid confusion, Westinghouse is providing Attachment A, which reflects the requested changes to the effluent limitations in Part A of the Draft Permit for IMP 101 and IMP 201.

COMMENT NO. 2: Part A; I.B & I.C IMP 101 - The proposed Monthly Average, Daily Maximum, and Instantaneous Maximum concentration-based effluent limits for Outfall 101 for Total Suspended Solids, Chromium, Cyanide, Fluoride, Nickel, and Ammonia are not appropriate under applicable regulations and should be removed.

Westinghouse objects to the imposition of concentration-based effluent limitations for Total Suspended Solids, Chromium, Cyanide, Fluoride, Nickel, and Ammonia because there are no concentration-based limitations promulgated in the applicable ELG category. The concentration-based effluent limits applied at IMP 101 are not technology-based effluent limitations (TBELs) calculated from the applicable ELGs; applying the ELGs to develop TBELs results in mass effluent limits, and not concentration-based limits. Consequently, any proposed concentration based TBEL is a best professional judgment (BPJ) TBEL. BPJ TBELs may be developed in the absence of applicable ELGs. However, ELGs are applicable in this case, and, therefore, the BPJ concentration-based TBELs are unwarranted.[1] Attachment A reflects this requested change.

COMMENT NO. 3: Part A; I.B & I.C IMP 101 – Monitoring requirements and effluent limitations for Total Residual Chlorine at IMP 101 should not be included in the Draft Permit because chlorination is not used at the Facility.

The Draft Permit includes Average Monthly, Daily Maximum, and Instantaneous Maximum effluent limitations for Total Residual Chlorine (TRC) at IMP 101. Page 11 of the Fact Sheet references 25 Pa. Code § 92a.48(b) as the basis for the proposed TRC limits because § 92a.48(b) requires technology-based TRC limits for "facilities or activities that use chlorination." However, chlorination has not been used at the Facility for more than 10 years. Additionally, there are no future plans to implement chlorination at the Facility.

Further, the Fact Sheet also indicates that, "The results of the [water quality-based effluent limitation (WQBEL)] modeling, included in Attachment F, indicate that no WQBELs are required for TRC." Page 14.

Neither TRC nor temperature limits are included in the Facility's current NPDES Permit. The Department had added proposed TRC effluent limitations in the Pre-Draft Permit for IMP 201 and IMP 301 and then removed these proposed limitations in the Draft Permit because "the permittee no longer uses and does not plan to use chlorination." Fact Sheet, Pages 21 & 24. However, effluent limitations for TRC were then added in the Draft Permit for IMP 101. The effluent limitations for TRC at IMP 101 appear to have been included in error and should be removed from the Draft Permit. Attachment A reflects this requested change.

[1] Westinghouse acknowledges that the currently effective permit contains concentration-based effluent limits but believes these concentration-based limits should not have been imposed in the effective permit on a technology-based basis and therefore should be removed.

COMMENT NO. 4: Part A; I.B & I.C & Part C; III.A IMP 101 – The effluent limitations for Aluminum, Iron, and Manganese at IMP 101 should be revised to be consistent with mass-based Waste Load Allocations in the TMDL.

The Draft Permit contains concentration-based effluent limits at IMP 101 for Aluminum, Iron, and Manganese that are equivalent to the ambient water quality criteria applied "end-of-pipe," and, as proposed, would be effective two years after the final Permit's effective date. However, the applicable total maximum daily load (TMDL) contains mass-based waste load allocations for these parameters for point sources.[2] Westinghouse understands that the TMDL is predicated on achieving overall reduction in pollutant ***loadings*** from point sources and non-point sources. Accordingly, the effluent limits for aluminum, iron, and manganese at IMP 101 should be based on the ***mass*** waste load allocations in the TMDL. For Westinghouse IMP 101, these allocations are as follows:

- Aluminum: 256 lbs/year
- Iron: 512 lbs/year
- Manganese: 341 lbs/year

As shown below, these waste load allocations (WLAs) convert to the following effluent limits for IMP 101:

	TMDL Mass WLAs		IMP 101 Flow Rate		**Proposed IMP 101 Effluent Limits, mg/L[3]**	
Parameter	lb/year	lb/day	mgd	mg/L	**M. Avg**	**D. Max**
Aluminum	256	0.70	0.090	0.93	**0.93**	**0.93**
Iron	512	1.40	0.090	1.87	**1.87**	**3.74**
Manganese	341	0.93	0.090	1.24	**1.24**	**2.49**

Westinghouse requests that the effluent limitations for Aluminum, Iron, and Manganese for IMP 101 be revised to reflect these Daily Maximum and Monthly Average limits. Attachment A reflects this requested change.

COMMENT NO. 5: Part A; I.B & I.C & Part C; II.A IMP 101 – The Compliance Schedule for Aluminum, Iron, and Manganese at IMP 101 should be extended to three years after the Permit Effective Date.

The Draft Permit proposes Average Monthly and Daily Maximum effluent limitations for Aluminum, Iron, and Manganese at IMP 101, which would become effective two years after the effective date of the final Permit. The Draft Permit also proposes a two-year Compliance Schedule,

[2] TMDLs for Streams Impaired by Acid Mine Drainage in the Kiskiminetas-Conemaugh River Watershed, Pennsylvania, January 29, 2010, Appendix G.
[3] Per Department practice, limits based on acute criterion are applied as Daily Maximum and Monthly Average limits, and limits based on Human Health Criteria are applied as Monthly Average with the Daily Maximum limit being twice the Monthly Average limit.

requiring both the completion of a feasibility study and the implementation of changes to achieve the effluent limitations within only one year after the Permit effective date.

No limits were previously imposed for Aluminum, Iron, and Manganese at IMP 101 and, as the Department acknowledges in the Fact Sheet (Page 16), "it is uncertain if Westinghouse can meet these limitations upon permit issuance." The Facility requires time to collect data, determine whether the Facility can meet the proposed effluent limitations, and, if not, identify and implement steps to achieve these proposed effluent limitations.

Pennsylvania's NPDES regulations authorize compliance schedules of up to five years for existing discharges. 25 Pa. Code § 92a.51. Westinghouse requests the Compliance Schedule be extended to require that the feasibility study be completed within two years of the final Permit effective date and the changes to achieve compliance with the effluent limitations be implemented within three years after the Permit effective date. Extending the Compliance Schedule by a year should provide the Facility the time to collect and analyze the required data and identify and implement any necessary actions to achieve the effluent limitations three years after the Permit effective date. Westinghouse requests that the compliance schedule for Aluminum, Iron and Manganese at IMP 101 be amended as follows to reflect these milestones:

Proposed Compliance Schedule:

1) One year after Permit Effective Date: Submit a progress report describing investigations and evaluations that the Facility is conducting to achieve the effluent limits;
2) Two years after Permit Effective Date: Feasibility study completion;
3) Three years after Permit Effective Date: Implement changes to achieve compliance with effluent limits.
4) Three years after Permit Effective Date: Compliance with effluent limits.

Attachment A reflects this requested change.

COMMENT NO. 6: Part A; I.B & I.C IMP 101 – The IMAX for Total Suspended Solids was decreased unnecessarily and should be eliminated or remain as 30 mg/l.

The Draft Permit imposes an IMAX effluent limitation of 18.75 mg/L for Total Suspended Solids (TSS) at IMP 101, which is a decrease from the current IMAX effluent limitation of 30 mg/L.

Westinghouse believes that the concentration-based BPJ TBELs at IMP 101 are unnecessary and that there is no cause to further reduce the Instantaneous Maximum effluent limit for TSS in this case. As discussed in Comment 2, the concentration-based effluent limits applied at IMP 101 are not TBELs calculated from the applicable ELGs; applying the ELGs to develop TBELs results in mass-based effluent limits, and not concentration-based limits. Consequently, any proposed concentration-based TBEL is a BPJ TBEL. BPJ TBELs may be developed in the absence of applicable ELGs. However, ELGs are applicable in this case, and, therefore, the BPJ concentration-based TBELs are unwarranted.

In addition, under the Department's *Technical Guidance for the Development and Specification of Effluent Limitations and Other Permit Conditions in NPDES Permits,* the monthly average limit for industrial discharges can be multiplied by 2.5 to calculate the instantaneous maximum limit.[4] Multiplying the monthly average limit of 12 mg/L by 2.5 results in an instantaneous maximum limit of 30 mg/L, equivalent to the effective permit limit.

COMMENT NO. 7: Part A; I.D & I.E IMP 201 – The Dissolved Oxygen limit for IMP 201 should be removed from the Draft Permit because it is not required. Alternatively, the Compliance Schedule should be modified to extend the deadline for the implementation of changes to achieve effluent limitations to three years after the Permit Effective Date.

The Draft Permit imposes a minimum BPJ TBEL for Dissolved Oxygen (DO) of 4 mg/L at IMP 201. Westinghouse requests that the Department reconsider the need for a BPJ TBEL in this case and remove the Dissolved Oxygen limit for IMP 201 from the Permit. Westinghouse makes this request because the low volume IMP 201 discharge flow (0.0037 mgd) cannot reasonably be anticipated to have an adverse impact on the Dissolved Oxygen concentration of the Conemaugh River. Therefore, the limit is unnecessary.

In the alternative, and without compromising the comment above regarding removal of the proposed limit, Westinghouse believes that the proposed compliance schedule for Dissolved Oxygen for IMP 201 should be extended to three years if the Department does not remove the effluent limitation, as requested.

The Draft Permit proposes a Compliance Schedule to achieve the proposed 4.0 mg/L effluent limitation for Dissolved Oxygen at IMP 201 two years after the final Permit Effective Date. The Compliance Schedule, as proposed, would require Westinghouse to both complete a feasibility study and also implement changes to achieve effluent limitations within one year after the Permit Effective Date.

As acknowledged by the Department (Page 21 of the Fact Sheet), the "limitation for DO is new to the permit and no data has been collected by the permittee to determine if they can achieve the limitation upon permit issuance." While the Department has agreed to provide Westinghouse "time to collect data and determine if additional treatment is needed to achieve the new limit," the timeframe specified by the Department is insufficient to complete this evaluation.

Westinghouse requests that the deadline to complete the feasibility study be extended to two years after the final Permit's Effective Date and the deadline to implement changes to achieve the effluent limitations be extended to three years after the final Permit Effective Date, with the proposed effluent limitations becoming effective three years after the final Permit Effective Date. Adjusting the deadlines as shown below will enable Westinghouse to appropriately collect data over varying seasonal conditions, analyze the results of the feasibility study, and identify and implement necessary measures to comply with the proposed effluent limitations. Westinghouse requests that the compliance schedule be amended to contain the following milestones:

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[4] *Technical Guidance for the Development and Specification of Effluent Limitations and Other Permit Conditions in NPDES Permits, October 1, 1997, minor edits through June 28, 2023; page 39.*

Proposed Compliance Schedule:

1) One year following Permit Effective Date: Submit a progress report describing investigations and evaluations that the facility is conducting to achieve the effluent limit;
2) Two years following Permit Effective Date: Feasibility study completion;
3) Three years following Permit Effective Date: Complete changes and achieve compliance with effluent limit.

Attachment A reflects these requested changes.

COMMENT NO. 8: Part C; V.F.7 & V.G Outfall 002 – The imposition of a 0.5 microgram per liter benchmark for Trichloroethylene for Outfall 002 is unnecessary and should be deleted from the Draft Permit. In the alternative, and if triggered by benchmark exceedances, Westinghouse will develop a Corrective Action Plan, as proposed, but with the understanding that further pollutant reductions may not be technologically available and economically practicable and/or necessary to prevent stormwater discharges from causing or contributing to an exceedance of applicable water quality standards for the Conemaugh River.

A. As explained in further detail below, the imposition of a 0.5 microgram per liter (µg/L) benchmark for Trichloroethylene (TCE) for Outfall 002 is unnecessary and should be removed from the Draft Permit.

As acknowledged by the Department in the Fact Sheet, Outfall 002 discharges "through a buried pipe network that daylights on the property. This discharge then forms a drainage swale across the adjacent U. S. Army Corps of Engineers property that is a part of the Conemaugh River Flood Control Dam Project, and then into the Conemaugh River." Consistent with this description, the Draft Permit confirms the Conemaugh River as the receiving stream for discharges from Outfall 002. Therefore, the reasonableness and necessity of the TCE benchmark must be evaluated based on this discharge to the Conemaugh River.

Westinghouse estimates that the preliminary WQBELs for TCE for discharges to the Conemaugh River would be a Monthly Average of 2,890 µg/L and a Daily Maximum of 4,508 µg/L. These WQBELs are one to three orders of magnitude higher than the TCE concentrations identified at the end-of-pipe, two to three orders of magnitude higher than the TCE concentrations identified at the Facility's property line and four orders of magnitude higher than the proposed TCE benchmark (i.e., 0.5 ug/l). Therefore, the imposition of a TCE benchmark (or a TCE effluent limitation) is unnecessary and should be deleted from the Draft Permit.

Westinghouse also notes that the nearest downstream public water supply intake is approximately 16 miles downstream from the Facility.

B. In the alternative, and if triggered by benchmark exceedances, Westinghouse will develop a Corrective Action Plan, as proposed, but with the understanding that further pollutant

reductions may not be technologically available and economically practicable or necessary to prevent stormwater discharges from causing or contributing to an exceedance of applicable water quality standards for the Conemaugh River.

The Draft Permit proposes to require a Corrective Action Plan (CAP) to reduce concentrations of pollutants in stormwater, if the proposed TCE benchmark is exceeded for two or more consecutive sampling events. The Draft Permit also states that, in developing the CAP, "alternatives to reduce stormwater concentrations and implement all relevant and feasible control measures" would not be required if Westinghouse demonstrated that further pollutant reductions may not be technologically available and economically practicable or necessary for the Conemaugh River to meet the applicable water quality standards.

Westinghouse has continued to conduct ongoing efforts to reduce the concentration of TCE in stormwater, with activities conducted since 2022 including the following:

- SMP completed underground camera inspections of piping coming from the TCE plume area to the main line.
- SMP excavated and redirected the roof drains away from the TCE area and grouted and capped all the lines in the plume area.
- SMP lined two manhole basins and sealed two penetrations from old, abandoned piping that was allowing groundwater to infiltrate the stormwater system.
- SMP identified additional infiltration around MH-1. The site will investigate and repair as necessary.

If the requirement to develop a CAP is triggered by two consecutive exceedances of the TCE benchmark, Westinghouse would submit a CAP that would evaluate alternatives for reducing TCE concentrations at Outfall 002. However, it is possible that, in light of previous activities aimed toward reducing TCE concentrations, Westinghouse may conclude that additional pollutant reductions are not technologically available and economically practicable. In addition, based on the calculations discussed above, Westinghouse may conclude that no pollutant reductions are necessary to meet the applicable water quality standards for the Conemaugh River. It is Westinghouse's understanding that, if either conclusion is reached, additional control measures will not be required.

C. It is improper for the TCE benchmark value to be lower than the Human Health Criterion.

The Human Health Criterion articulated in 25 Pa. Code Chapter 93 is 0.6 µg/L. It is unnecessary and unreasonable for the benchmark value to be lower than the Human Health Criterion.

D. The sampling location for Outfall 002 should be moved to the end of the Facility property boundary.

Outfall 002 data provided in the 2020 NPDES permit application represents the dry and wet weather sample results from the end of the pipe, conveying underground stormwater and groundwater. However, the end of this pipe is approximately 180 feet within the Facility's property

boundary. The sampling location representing all groundwater and stormwater flow from the Outfall 002 drainage area is the location where the drainage swale leaves the Facility property. Westinghouse requests that, in the renewed NPDES permit, the sample location for Outfall 002 be identified at the Facility's property boundary.

As shown below, Westinghouse has analyzed dry weather and wet weather samples from this location, as well as from the end of the upgradient piping for TCE, and identified that the concentrations of TCE in the discharge decrease significantly between the end of the piping and the end of the drainage area

Date	TCE Concentration at End of Piping (µg/L)	TCE Concentration at End of Property Boundary (µg/L)
3/29/2001 (dry weather)	100	33
5/24/2001 (dry weather)	140	Data not available
3/30/2007 (dry weather)	85	25
4/25/2007 (wet weather)	25	17
October 2020 (wet weather)	14.5 and 23.9	Data not available
11/04/2021 (dry weather)	25	5
11/11/2021 (dry weather)	6.01	4.09
11/18/2021* (dry weather)	9.31	5.04
11/18/2021* (wet weather)	5.56	5.46

* Two samples collected on 11/18/2021: one dry weather prior to rain event and one following start of rain event.

COMMENT NO. 9: Part C; IV – The chemical additives requirements should be removed or, in the alternative, should be clarified to identify that these requirements do not apply to wastewater treatment chemicals.

The Department's "Standard Operating Procedure for Clean Water Program Chemical Additives," SOP No. BPNPSM-PMT-030, as revised January 13, 2015, Version 1.4, states that the term "chemical additive . . . generally excludes chemicals used for neutralization of waste streams, the production of goods, and treatment of wastewater." Page 1 (emphasis added).

The chemical additives used at the Facility are for the treatment of wastewater and should not be subject to the "chemical additives" requirements of Part C.IV of the Draft Permit. Therefore, Westinghouse requests the Department either remove Part C.IV of the Draft Permit or, in the alternative, insert language clarifying that Part C.IV of the Draft Permit does not apply to chemicals used for the treatment of wastewater.

COMMENT NO. 10: Certain typographic/administrative errors in the Draft Permit should be corrected.

Westinghouse has identified the following typographic/administrative errors in the Draft Permit and requests that these errors be corrected:

A. Part C; V.D.2 – Paragraphs V.D.2.l to V.D.2.q, pertaining to Routine Inspections, are improperly lettered and should instead be V.D.2.a to V.D.2.f.

B. Part C; V.G – The Section pertaining to the Corrective Action Plan in Part C is improperly labeled as V.A, but should be V.G.

We appreciate this opportunity to comment on the Draft Permit and request a meeting to discuss our comments prior to the finalization of the Permit. If you have any questions or would like to discuss these comments further, please contact me at chris1m@westinghouse.com or 724-459-4164.

Sincerely,

Michael Christoforetti
Environment, Health, and Safety Manager
Westinghouse Electric Company Specialty Metals Plant

cc: Mr. Adam Caldwell – Westinghouse Electric Company, LLC
Ms. Christine Kuzmkowski – Woodard & Curran
Mr. Bryan Maurer - Woodard & Curran
Mr. Michael E. Fifth, P.E. – PADEP

Enclosures

Attachment B:

Revised ELG Mass-Based Calculations

Westinghouse Electric Company, LLC - Specialty Metals Plant
Federal ELG Calculations
PA0000892
Authorization 635342

NPDES Permit Application Reported Production Rates	
Operation	**Anticipated Average Annual Production (Off-lbs production/year)**
Zirconium-Hafnium Surface Treatment Spent Baths	3,000,000
Zirconium-Hafnium Surface Treatment Rinse	2,800,000
Zirconium-Hafnium Alkaline Cleaning Spent Baths	11,600,000
Zirconium-Hafnium Alkaline Cleaning Rinse	11,600,000
Zirconium-Hafnium Sawed or Grinding with Spent Emulsions	1,200,000
Zirconium-Hafnium Sawed or Grinding with Contact Cooling Water	1,200,000
Sawed or Grinding Zirconium-Hafnium Rinse	1,200,000
Zirconium-Hafnium inspection and testing Wastewater	1,300,000

IMP 101

ELG 40 CFR 471.91/92 (h) Zirconium-Hafnium Forming Surface Treatment Spent Baths

Pollutant	BPT/BAT Effluent Limitations (lbs/1,000,000 off-lb zirconium-hafnium surface treated)		Mass-Based Effluent Limits (lbs./day)	
	Max for any 1 day	Average Daily Value for 30 consecutive days	Average Monthly	Max Daily
Chromium	0.150	0.061	0.00073	0.00179
Cyanide	0.099	0.041	0.00049	0.00118
Nickel	0.653	0.432	0.00514	0.00777
Ammonia	45.300	20.000	0.23810	0.53929
Fluoride	20.300	8.980	0.10690	0.24167
Oil and Grease	6.800	4.080	0.04857	0.08095
TSS	14.000	6.630	0.07893	0.16667
pH	Within Range of 7.5 to 10.0		Within Range of 7.5 to 10.0	

Sample Calculations

Mass-Based Effluent Limit (lbs/day)= [ELG Max for any 1 day (lbs/(million off-lbs production))] * [Average Daily Production ((million off-lbs production)/day)]

Chromium Max Daily Mass-Based Effluent Limit (lbs/day) = [((0.15 lbs)/(million off-lbs production))] * [((3,000,000 off-lbs production)/year)* ((1 year)/(12 month))* ((1 month)/(21 day))*((1 million off-lbs production)/(1,000,000 off-lbs production))]

Chromium Max Daily Mass-Based Effluent Limit (lbs/day) = 0.0018 lbs/day

ELG 40 CFR 471.91/92 (k) Zirconium-Hafnium Forming Alkaline Cleaning Rinse

Pollutant	BPT/BAT Effluent Limitations (lbs/1,000,000 off-lb zirconium-hafnium Alkaline Cleaned)		Mass-Based Effluent Limits (lbs./day)	
	Max for any 1 day	Average Daily Value for 30 consecutive days	Average Monthly	Max Daily
Chromium	1.3800	0.5650	0.02601	0.06352
Cyanide	0.9110	0.3770	0.01735	0.04193
Nickel	6.0300	3.9900	0.18367	0.27757
Ammonia	419.0000	184.0000	8.46984	19.28730
Fluoride	187.0000	82.9000	3.81603	8.60794
Oil and Grease	628.0000	377.0000	17.35397	28.90794
TSS	1290.0000	613.0000	28.21746	59.38095
pH	Within Range of 7.5 to 10.0		Within Range of 7.5 to 10.0	

ELG 40 CFR 471.91/92 (l) Zirconium-Hafnium Forming Sawing or Grinding Spent Emulsions

Pollutant	BPT/BAT Effluent Limitations (lbs/1,000,000 off-lb zirconium-hafnium Sawed or Ground with Emulsions)		Mass-Based Effluent Limits (lbs./day)	
	Max for any 1 day	Average Daily Value for 30 consecutive days	Average Monthly	Max Daily
Chromium	0.1240	0.0510	0.00024	0.00059
Cyanide	0.0820	0.0340	0.00016	0.00039
Nickel	0.5400	0.3570	0.00170	0.00257
Ammonia	37.5000	16.5000	0.07857	0.17857
Fluoride	16.7000	7.4200	0.03533	0.07952
Oil and Grease	5.6200	3.3700	0.01605	0.02676
TSS	11.5000	5.4800	0.02610	0.05476
pH	Within Range of 7.5 to 10.0		Within Range of 7.5 to 10.0	

ELG 40 CFR 471.91/92 (i) Zirconium-Hafnium Forming Surface Treatment Rinse

Pollutant	BPT/BAT Effluent Limitations (lbs/1,000,000 off-lb zirconium-hafnium surface treated)		Mass-Based Effluent Limits (lbs./day)	
	Max for any 1 day	Average Daily Value for 30 consecutive days	Average Monthly	Max Daily
Chromium	0.3910	0.160	0.00178	0.00434
Cyanide	0.2580	0.107	0.00119	0.00287
Nickel	1.7100	1.130	0.01256	0.01900
Ammonia	119.0000	52.100	0.57889	1.32222
Fluoride	52.9000	23.500	0.26111	0.58778
Oil and Grease	178.0000	107.000	1.18889	1.97778
TSS	364.0000	173.000	1.92222	4.04444
pH	Within Range of 7.5 to 10.0		Within Range of 7.5 to 10.0	

ELG 40 CFR 471.91/92 (j) Zirconium-Hafnium Forming Alkaline Cleaning Spent Baths

Pollutant	BPT/BAT Effluent Limitations (lbs/1,000,000 off-lb zirconium-hafnium Alkaline Cleaned)		Mass-Based Effluent Limits (lbs./day)	
	Max for any 1 day	Average Daily Value for 30 consecutive days	Average Monthly	Max Daily
Chromium	0.7040	0.2880	0.01326	0.03241
Cyanide	0.4640	0.1920	0.00884	0.02136
Nickel	3.0700	2.0300	0.09344	0.14132
Ammonia	214.0000	93.8000	4.31778	9.85079
Fluoride	95.2000	42.3000	1.94714	4.38222
Oil and Grease	32.0000	19.2000	0.88381	1.47302
TSS	65.6000	31.2000	1.43619	3.01968
pH	Within Range of 7.5 to 10.0		Within Range of 7.5 to 10.0	

ELG 40 CFR 471.91/92 (q) Zirconium-Hafnium Forming Sawing or Grinding Contact Cooling Water

Pollutant	BPT/BAT Effluent Limitations (lbs/1,000,000 off-lb zirconium-hafnium Sawed or Ground with Cooling Water)		Mass-Based Effluent Limits (lbs./day)	
	Max for any 1 day	Average Daily Value for 30 consecutive days	Average Monthly	Max Daily
Chromium	0.1420	0.0580	0.00028	0.00068
Cyanide	0.0930	0.0390	0.00019	0.00044
Nickel	0.6170	0.4080	0.00194	0.00294
Ammonia	42.8000	18.8000	0.08952	0.20381
Fluoride	19.1000	8.4800	0.04038	0.09095
Oil and Grease	6.4200	3.8500	0.01833	0.03057
TSS	13.2000	6.2600	0.02981	0.06286
pH	Within Range of 7.5 to 10.0		Within Range of 7.5 to 10.0	

ELG 40 CFR 471.91/92 (r) Zirconium-Hafnium Forming Sawing or Grinding Rinse

Pollutant	BPT/BAT Effluent Limitations (lbs/1,000,000 off-lb of Sawed or Ground zirconium-hafnium Rinsed)		Mass-Based Effluent Limits (lbs./day)	
	Max for any 1 day	Average Daily Value for 30 consecutive days	Average Monthly	Max Daily
Chromium	0.0790	0.0330	0.00016	0.00038
Cyanide	0.0520	0.0220	0.00010	0.00025
Nickel	0.3460	0.2290	0.00109	0.00165
Ammonia	24.0000	10.6000	0.05048	0.11429
Fluoride	10.7000	4.7500	0.02262	0.05095
Oil and Grease	36.0000	21.6000	0.10286	0.17143
TSS	73.8000	35.1000	0.16714	0.35143
pH	Within Range of 7.5 to 10.0		Within Range of 7.5 to 10.0	

ELG 40 CFR 471.91/92 (t) Zirconium-Hafnium Forming Inspection and Testing Wastewater

Pollutant	BPT/BAT Effluent Limitations (lbs/1,000,000 off-lb of zirconium-hafnium Tested)		Mass-Based Effluent Limits (lbs./day)	
	Max for any 1 day	Average Daily Value for 30 consecutive days	Average Monthly	Max Daily
Chromium	0.0070	0.0030	0.00002	0.00004
Cyanide	0.0050	0.0020	0.00001	0.00003
Nickel	0.0300	0.0200	0.00010	0.00015
Ammonia	2.0600	0.9030	0.00466	0.01063
Fluoride	0.9170	0.4070	0.00210	0.00473
Oil and Grease	0.3080	0.1850	0.00095	0.00159
TSS	0.6320	0.3010	0.00155	0.00326
pH	Within Range of 7.5 to 10.0		Within Range of 7.5 to 10.0	

Pollutant	Mass-Based Effluent Limits (lbs./day)	
	Average Monthly	Max Daily
Chromium	0.0425	0.104
Cyanide	0.0283	0.0684
Nickel	0.300	0.453
Ammonia	13.8	31.5
Fluoride	6.23	14.0
Oil and Grease	19.6	32.7
TSS	31.9	67.1
pH	Within Range of 7.5 to 10.0	

Attachment C:

Revised IMP 301 Toxics Management Spreadsheet Results for TCE

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Toxics Management Spreadsheet
Version 1.4, May 2023

Discharge Information

Instructions | Discharge | Stream

Facility: Specialty Metals Plant NPDES Permit No.: PA0000892 Outfall No.: 301

Evaluation Type: Custom / Additives Wastewater Description: Remediated Groundwater

Discharge Characteristics								
Design Flow (MGD)*	Hardness (mg/l)*	pH (SU)*	Partial Mix Factors (PMFs)				Complete Mix Times (min)	
			AFC	CFC	THH	CRL	Q_{7-10}	Q_h
0.0098	100	6.5						

				0 if left blank		0.5 if left blank		0 if left blank			1 if left blank	
Discharge Pollutant	Units	Max Discharge Conc		Trib Conc	Stream Conc	Daily CV	Hourly CV	Stream CV	Fate Coeff	FOS	Criteria Mod	Chem Transl
Trichloroethylene	mg/L		0.144									

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Toxics Management Spreadsheet
Version 1.4, May 2023

Stream / Surface Water Information

Specialty Metals Plant, NPDES Permit No. PA0000892, Outfall 301

Instructions | Discharge | *Stream*

Receiving Surface Water Name: Conemaugh River

No. Reaches to Model: 1

- (●) Statewide Criteria
- ( ) Great Lakes Criteria
- ( ) ORSANCO Criteria

Location	Stream Code*	RMI*	Elevation (ft)*	DA (mi²)*	Slope (ft/ft)	PWS Withdrawal (MGD)	Apply Fish Criteria*
Point of Discharge	043832	17	910	890	0.0001		Yes
End of Reach 1	043832	16.5	909	891	0.0001		Yes

$Q_{7\text{-}10}$

Location	RMI	LFY (cfs/mi²)*	Flow (cfs)		W/D Ratio	Width (ft)	Depth (ft)	Velocity (fps)	Travel Time (days)	Tributary		Stream		Analysis	
			Stream	Tributary						Hardness	pH	Hardness*	pH*	Hardness	pH
Point of Discharge	17	0.094										100	7		
End of Reach 1	16.5	0.094													

Q_h

Location	RMI	LFY (cfs/mi²)	Flow (cfs)		W/D Ratio	Width (ft)	Depth (ft)	Velocity (fps)	Travel Time (days)	Tributary		Stream		Analysis	
			Stream	Tributary						Hardness	pH	Hardness	pH	Hardness	pH
Point of Discharge	17														
End of Reach 1	16.5														

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Toxics Management Spreadsheet
Version 1.4, May 2023

Model Results

Specialty Metals Plant, NPDES Permit No. PA0000892, Outfall 301

Instructions | Results | RETURN TO INPUTS | SAVE AS PDF | PRINT | ◉ All ○ Inputs ○ Results ○ Limits

☐ *Hydrodynamics*

☑ *Wasteload Allocations*

☑ *AFC* CCT (min): 15 PMF: 0.068 Analysis Hardness (mg/l): 100 Analysis pH: 7.00

Pollutants	Stream Conc (µg/L)	Stream CV	Trib Conc (µg/L)	Fate Coef	WQC (µg/L)	WQ Obj (µg/L)	WLA (µg/L)	Comments
Trichloroethylene	0	0		0	2,300	2,300	864,468	

☑ *CFC* CCT (min): 720 PMF: 0.471 Analysis Hardness (mg/l): 100 Analysis pH: 7.00

Pollutants	Stream Conc (µg/L)	Stream CV	Trib Conc (µg/L)	Fate Coef	WQC (µg/L)	WQ Obj (µg/L)	WLA (µg/L)	Comments
Trichloroethylene	0	0		0	450	450	1,169,134	

☑ *THH* CCT (min): 720 PMF: 0.471 Analysis Hardness (mg/l): N/A Analysis pH: N/A

Pollutants	Stream Conc (µg/L)	Stream CV	Trib Conc (µg/L)	Fate Coef	WQC (µg/L)	WQ Obj (µg/L)	WLA (µg/L)	Comments
Trichloroethylene	0	0		0	N/A	N/A	N/A	

☑ *CRL* CCT (min): 720 PMF: 0.759 Analysis Hardness (mg/l): N/A Analysis pH: N/A

Pollutants	Stream Conc (µg/L)	Stream CV	Trib Conc (µg/L)	Fate Coef	WQC (µg/L)	WQ Obj (µg/L)	WLA (µg/L)	Comments
Trichloroethylene	0	0		0	0.6	0.6	10,686	

☑ *Recommended WQBELs & Monitoring Requirements*

No. Samples/Month: 4

Mass Limits	*Concentration Limits*

Pollutants	AML (lbs/day)	MDL (lbs/day)	AML	MDL	IMAX	Units	Governing WQBEL	WQBEL Basis	Comments

☑ ***Other Pollutants without Limits or Monitoring***

The following pollutants do not require effluent limits or monitoring based on water quality because reasonable potential to exceed water quality criteria was not determined and the discharge concentration was less than thresholds for monitoring, or the pollutant was not detected and a sufficiently sensitive analytical method was used (e.g., <= Target QL).

Pollutants	Governing WQBEL	Units	Comments
Trichloroethylene	10.7	mg/L	Discharge Conc ≤ 25% WQBEL

Attachment D:

Outfall 002 Toxics Management Spreadsheet Results for TCE

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Toxics Management Spreadsheet
Version 1.4, May 2023

Discharge Information

Instructions | Discharge | Stream

Facility: Specialty Metals Plant NPDES Permit No.: PA0000892 Outfall No.: 002

Evaluation Type: Custom / Additives Wastewater Description: Remediated Groundwater

Discharge Characteristics								
Design Flow (MGD)*	Hardness (mg/l)*	pH (SU)*	Partial Mix Factors (PMFs)				Complete Mix Times (min)	
			AFC	CFC	THH	CRL	Q_{7-10}	Q_h
0.00288	100	7						

				0 if left blank		*0.5 if left blank*		*0 if left blank*			*1 if left blank*	
Discharge Pollutant	Units	Max Discharge Conc		Trib Conc	Stream Conc	Daily CV	Hourly CV	Stream CV	Fate Coeff	FOS	Criteria Mod	Chem Transl
Trichloroethylene	µg/L		25									

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Toxics Management Spreadsheet
Version 1.4, May 2023

Stream / Surface Water Information

Specialty Metals Plant, NPDES Permit No. PA0000892, Outfall 002

Instructions | Discharge | *Stream*

Receiving Surface Water Name: Conemaugh River

No. Reaches to Model: 1

- (●) Statewide Criteria
- ( ) Great Lakes Criteria
- ( ) ORSANCO Criteria

Location	Stream Code*	RMI*	Elevation (ft)*	DA (mi²)*	Slope (ft/ft)	PWS Withdrawal (MGD)	Apply Fish Criteria*
Point of Discharge	043832	16.8	910	890	0.0001		Yes
End of Reach 1	043832	16.5	909	891	0.0001		Yes

$Q_{7\text{-}10}$

Location	RMI	LFY (cfs/mi²)*	Flow (cfs)		W/D Ratio	Width (ft)	Depth (ft)	Velocity (fps)	Travel Time (days)	Tributary		Stream		Analysis	
			Stream	Tributary						Hardness	pH	Hardness*	pH*	Hardness	pH
Point of Discharge	16.8	0.094										100	7		
End of Reach 1	16.5	0.094													

Q_h

Location	RMI	LFY (cfs/mi²)	Flow (cfs)		W/D Ratio	Width (ft)	Depth (ft)	Velocity (fps)	Travel Time (days)	Tributary		Stream		Analysis	
			Stream	Tributary						Hardness	pH	Hardness	pH	Hardness	pH
Point of Discharge	16.8														
End of Reach 1	16.5														

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Toxics Management Spreadsheet
Version 1.4, May 2023

Model Results

Specialty Metals Plant, NPDES Permit No. PA0000892, Outfall 002

Instructions | Results | RETURN TO INPUTS | SAVE AS PDF | PRINT | ◉ All ○ Inputs ○ Results ○ Limits

☐ ***Hydrodynamics***

☑ ***Wasteload Allocations***

☑ ***AFC*** CCT (min): 15 PMF: 0.068 Analysis Hardness (mg/l): 100 Analysis pH: 7.00

Pollutants	Stream Conc (µg/L)	Stream CV	Trib Conc (µg/L)	Fate Coef	WQC (µg/L)	WQ Obj (µg/L)	WLA (µg/L)	Comments
Trichloroethylene	0	0		0	2,300	2,300	2,935,831	

☑ ***CFC*** CCT (min): 720 PMF: 0.471 Analysis Hardness (mg/l): 100 Analysis pH: 7.00

Pollutants	Stream Conc (µg/L)	Stream CV	Trib Conc (µg/L)	Fate Coef	WQC (µg/L)	WQ Obj (µg/L)	WLA (µg/L)	Comments
Trichloroethylene	0	0		0	450	450	3,976,905	

☑ ***THH*** CCT (min): 720 PMF: 0.471 Analysis Hardness (mg/l): N/A Analysis pH: N/A

Pollutants	Stream Conc (µg/L)	Stream CV	Trib Conc (µg/L)	Fate Coef	WQC (µg/L)	WQ Obj (µg/L)	WLA (µg/L)	Comments
Trichloroethylene	0	0		0	N/A	N/A	N/A	

☑ ***CRL*** CCT (min): 720 PMF: 0.759 Analysis Hardness (mg/l): N/A Analysis pH: N/A

Pollutants	Stream Conc (µg/L)	Stream CV	Trib Conc (µg/L)	Fate Coef	WQC (µg/L)	WQ Obj (µg/L)	WLA (µg/L)	Comments
Trichloroethylene	0	0		0	0.6	0.6	36,363	

☑ ***Recommended WQBELs & Monitoring Requirements***

No. Samples/Month: 4

Mass Limits	*Concentration Limits*

Pollutants	AML (lbs/day)	MDL (lbs/day)	AML	MDL	IMAX	Units	Governing WQBEL	WQBEL Basis	Comments

Other Pollutants without Limits or Monitoring

The following pollutants do not require effluent limits or monitoring based on water quality because reasonable potential to exceed water quality criteria was not determined and the discharge concentration was less than thresholds for monitoring, or the pollutant was not detected and a sufficiently sensitive analytical method was used (e.g., <= Target QL).

Pollutants	Governing WQBEL	Units	Comments
Trichloroethylene	36,363	µg/L	Discharge Conc ≤ 25% WQBEL