

Application Type Renewal
Facility Type Industrial
Major / Minor Minor

**NPDES PERMIT FACT SHEET
ADDENDUM**

Application No. PA0003824
APS ID 1010677
Authorization ID 1304311

Applicant and Facility Information

Applicant Name	<u>Nalco Production LLC</u>	Facility Name	<u>Nalco Ellwood City Plant (North & South Plant)</u>
Applicant Address	<u>PO Box 391 Ellwood City, PA 16117</u>	Facility Address	<u>125 Nalco Way Ellwood City, PA 16117</u>
Applicant Contact	<u>Carrie Birckbichler-Smith</u>	Facility Contact	<u>Carrie Birckbichler-Smith</u>
Applicant Phone	<u>(724) 752-5047</u>	Facility Phone	<u>(724) 752-5047</u>
Client ID	<u>354870</u>	Site ID	<u>239093</u>
SIC Code	<u>2899</u>	Municipality	<u>Franklin Township</u>
SIC Description	<u>Manufacturing – Chemicals and Chemical Preparations</u>	County	<u>Beaver</u>
Date Published in PA Bulletin	<u>January 14, 2023</u>	EPA Waived?	<u>Yes</u>
Comment Period End Date	<u>February 13, 2023</u>	If No, Reason	<u></u>
Purpose of Application	<u>NPDES Permit coverage renewal</u>		

Internal Review and Recommendations

On January 14, 2023, the Department published notice of draft NPDES permit PA0003824 in the PA Bulletin. Comments were received from Nalco Production LLC.

On December 15, 2022, Nalco Production LLC submitted several questions about the Draft NPDES permit via email.

On December 29, 2022, the Department provided clarifications regarding the Draft NPDES permit.



On January 4, 2023 Nalco Production LLC submitted one comment in response to the NPDES draft permit.

Nalco Production LLC Comments

Comment 1: Nalco Production LLC commented that occasionally, new or replacement equipment needs water tested prior to putting into service. The equipment is filled with clean city water to ensure no leaks. They would like to request a Part C condition be added to authorize Hydrostatic Testing Discharges.

Response 1: Several modifications to the Draft Permit have been recommended in response to the submitted comment. The nature of these modifications requires the Department to redraft the permit for an additional 30-day public comment period. The redrafted permit includes two Internal Monitoring Points (IMP).

In order to get the authorization to discharge Hydrostatic Testing waters, Nalco Production LLC provided the following information:

Approve	Return	Deny	Signatures	Date
X			 Angela Rohrer / Environmental Engineering Specialist	February 9, 2023
X			 Michael E. Fifth, P.E. / Environmental Engineer Manager	February 17, 2023

Internal Review and Recommendations

- The Outfalls to be used to discharge the water from the Hydrostatic Testing are Outfall 001 for North Plant, and Outfall 013 for South Plant.
- The expected discharge flowrate would be between 60 – 70 GPM.
- The volume would vary based on the size of the equipment. An estimated maximum would be ~10,000 gallons. That is on the high end. Most equipment testing would result in <6000 gallons.
- There would not be a set discharge frequency as generally, only newly installed equipment is hydro tested, so an as-needed basis. For an estimate, one to two times per year.

It is recommended that the redrafted permit be published in the PA Bulletin for public comment.

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.

Development of Effluent Limitations

Outfall No.	201	Design Flow (MGD)	0.12
Latitude	40° 51' 07.90"	Longitude	-80° 16' 18.75"
Outfall No.	113	Design Flow (MGD)	0.12
Latitude	40° 50' 26.40"	Longitude	-80° 16' 32.10"

Wastewater Description: Hydrostatic Test Water

Technology-Based Limitations

Hydrostatic test water discharge from new or replacement equipment is also addressed in the PAG-10 General Permit. The concentration limits for hydrostatic test water from the general permit are shown in Table 1.

Table 1. Technology based effluent limits for hydrostatic test water

Parameter	Minimum	Average Monthly	Instantaneous Maximum
Flow (GPM)		Report	
Duration (hours)		Report	
Total Volume Discharged (Gallons)		Report Total Monthly	
Dissolved Oxygen (mg/L)	5.0		
pH (standard units)	6.0		9.0
Total Residual Chlorine (TRC) (mg/L)		Report	0.05
Total Suspended Solids (TSS) (mg/L)		30.0	60.0
Oil and Grease (mg/L)		15.0	30.0
Dissolved Iron (mg/L)			7.0
Benzene (mg/L)			0.0025
BTEX (mg/L)			0.25
Total PCBs (µg/L)		Report	Report

Water Quality-Based Limitations

A water quality analysis was not performed to calculate water quality based effluent limitations as the discharge water is hydrostatic test water.

Anti-Backsliding

These are new Internal Monitoring Points (IMP), EPA's anti-backsliding regulation, 40 CFR 122.44(l) is not applicable to IMP 201 and IMP113.

Proposed Effluent Limitations and Monitoring Requirements

The proposed effluent monitoring requirements for IMP 201 and IMP 113 are displayed in Table 2 below, they are the most stringent values from the above effluent limitation development.

Table 2: Propose Limitations at IMP 201 and IMP 113

Parameter	Effluent Limitations			Monitoring Requirements	
	Instant. Minimum	Average Monthly	Instantaneous Maximum	Minimum Measurement Frequency ^{(1),(2)}	Sample Type
Flow (GPM) ⁽³⁾	XXX	Report	XXX	1/discharge	Measured
Duration of Discharge (Hours) ⁽³⁾	XXX	Report	XXX	1/discharge	Measured
Total Volume Discharged (Gallons) ⁽³⁾	XXX	Report Total Monthly	XXX	1/month	Calculated
Dissolved Oxygen (mg/L)	5.0	XXX	XXX	2/discharge	Grab
pH (S.U.)	6.0	XXX	9.0	2/discharge	Grab
Total Residual Chlorine (TRC) (mg/L) ⁽⁴⁾	XXX	Report	0.05	2/discharge	Grab
Total Suspended Solids (TSS) (mg/L)	XXX	30	60	1/discharge	Grab
Oil and Grease (mg/L)	XXX	15	30	1/discharge	Grab
Dissolved Iron (mg/L)	XXX	XXX	7.0	1/discharge	Grab
Benzene (mg/L) ⁽⁵⁾	XXX	XXX	0.0025	1/discharge	Grab
BTEX (mg/L) ^{(5), (6)}	XXX	XXX	0.25	1/discharge	Grab
Total PCBs (µg/L) ⁽⁷⁾	XXX	Report	Report	1/discharge	Grab

Footnotes

- (1) This is the minimum number of sampling events required. Permittees are encouraged, and it may be advantageous in demonstrating compliance, to perform more than the minimum number of sampling events.
- (2) The permittee shall collect samples at the point of discharge (outfall) prior to the discharge entering the receiving waters. For measurement frequencies of 1/discharge, the permittee shall collect samples within the first 30 minutes of commencing a discharge. For measurement frequencies of 2/discharge, the permittee shall collect one sample at the start of a discharge and one sample at the end of a discharge.
- (3) The permittee shall report the average monthly flow, in gallons per minute (GPM), for all discharges occurring during the month. The permittee shall measure the flow and the duration of the discharge (in hours) for each discharge and shall report this information to DEP in the Annual Report as specified in Part A III of this permit. The permittee shall report the total volume discharged each month, in gallons.
- (4) The permittee shall comply with effluent limitations and monitoring requirements for Total Residual Chlorine (TRC) when a public water supply or other source of chlorinated water is used in hydrostatic testing.
- (5) The permittee shall comply with effluent limitations and monitoring requirements for Benzene and BTEX for existing natural gas transmission lines (NGTLs), existing petroleum storage tanks (PSTs) and existing petroleum transmission lines (PTLs).
- (6) The permittee shall calculate Total BTEX as the sum of concentrations for Benzene, Toluene, Ethylbenzene, and Total Xylenes determined through analysis of the same sample.
- (7) Monitoring for Total PCBs is required only for existing Natural Gas Transmission Lines (NGTLs).

Rohrer, Angela

From: Birckbichler-Smith, Carrie <cbirckbichler@ecolab.com>
Sent: Thursday, December 15, 2022 10:31 AM
To: Rohrer, Angela
Subject: [External] RE: DRAFT NPDES Permit PA0003824 Renewal - Nalco Ellwood City Plant (North & South Plant) - Auth 1304311

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Hi Angela,

I'm reviewing the draft permit and attachments. There are a few questions I have so far that I'm hoping you can clarify for me.

- Does the facility choose monitoring months, as long as sampling is at least once/6 months?
- Should there be two consecutive exceedances, is there a minimum period of time between samples? For instance, if sampling is completed three months between and both sampling rounds exceed the limitations, is a corrective action plan required? Or is a CA plan required only for samplings 6 months apart?
- For delegation of DMR signatory authority, must this be submitted for each DMR or just once upon commencement of the permit?
- In Part B(F)(2) "Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation." Occasionally, new or replacement equipment needs water tested prior to putting into service. The equipment is filled with clean city water to ensure no leaks. According to this section, am I understanding it correctly that for this water testing, the city water may be discharged from our outfalls?
- Just confirming that the annual report is submitted via hardcopy to the SW regional office, not through Greenport, correct? Also, form 3850-PM-BCW0083 is required for the annual report, correct?

Thank you

Carrie Birckbichler-Smith
EH&S Manager, Ellwood City Plant

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Rohrer, Angela

From: Rohrer, Angela
Sent: Thursday, December 29, 2022 7:21 AM
To: Birckbichler-Smith, Carrie
Cc: Fifth, Michael
Subject: RE: [External] RE: DRAFT NPDES Permit PA0003824 Renewal - Nalco Ellwood City Plant (North & South Plant) - Auth 1304311

Good morning Carrie,

Please see responses below in red.

Angela Rohrer | Environmental Engineering Specialist
Department of Environmental Protection | Clean Water Program
400 Waterfront Drive | Pittsburgh, PA 15222
Phone: 412-442-4069

DEP is now accepting permit and authorization applications, as well as other documents and correspondence, electronically through the OnBase Electronic Forms Upload tool. Please use the link below to view the webpage, get instructions, and submit documents: <https://www.dep.pa.gov/DataandTools/Pages/Application-Form-Upload.aspx>

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From: Birckbichler-Smith, Carrie <cbirckbichler@ecolab.com>
Sent: Thursday, December 15, 2022 10:31 AM
To: Rohrer, Angela <anrohrer@pa.gov>
Subject: [External] RE: DRAFT NPDES Permit PA0003824 Renewal - Nalco Ellwood City Plant (North & South Plant) - Auth 1304311

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Hi Angela,

I'm reviewing the draft permit and attachments. There are a few questions I have so far that I'm hoping you can clarify for me.

- Does the facility choose monitoring months, as long as sampling is at least once/6 months?
According to the Draft Permit, Part A (III, B), semiannual DMRs must be received within 28 days following the end of each calendar semiannual period, i.e., January 28 and July 28.
In the same way when the monitoring is performed you need to be sure you are in compliance with Part C (III, F). That said, as long as you follow the requirements mentioned before, you can choose the months to collect the sample.

- Should there be two consecutive exceedances, is there a minimum period of time between samples? For instance, if sampling is completed three months between and both sampling rounds exceed the limitations, is a corrective action plan required? Or is a CA plan required only for samplings 6 months apart?

A Corrective Action Plan should be submitted in the event that stormwater discharge concentrations for a parameter exceeds the benchmark values at the same outfall, same parameter for two or more consecutive monitoring periods.

- For delegation of DMR signatory authority, must this be submitted for each DMR or just once upon commencement of the permit?

As long as the person is the same you have to do it just once.

- In Part B(F)(2) "Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation." Occasionally, new or replacement equipment needs water tested prior to putting into service. The equipment is filled with clean city water to ensure no leaks. According to this section, am I understanding it correctly that for this water testing, the city water may be discharged from our outfalls?

Condition B.F. Bypassing does state that a permittee may allow a bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. When asking about new or replacement equipment needing water tested prior to putting into service, this situation is authorized by the PAG-10 Discharges from Hydrostatic Testing of Tanks and Pipelines. The parameters of concern of a Hydrostatic Test discharge and the sampling frequency being 2/discharge (near the start and near the end of the discharge) are different than the existing effluent limitations imposed at this outfall. Hydrostatic Testing Discharges require a PAG-10 permit to authorize the discharge and are not authorized by existing Draft permit. If this is something the facility does/or is planning, a Part C condition could be added to authorize Hydrostatic Testing Discharges.

- Just confirming that the annual report is submitted via hardcopy to the SW regional office, not through Greenport, correct? Also, form 3850-PM-BCW0083 is required for the annual report, correct?

Electronic submission to Greenport is preferred because the Department is going paperless, if you have a problem uploading documents, then you can submit hard copies.

There was a problem when including the draft permit in the PA Bulletin. Notice of this action will actually be included in the January 14, 2023 issue of the Pennsylvania Bulletin. The 30-day comment period will expire on February 13, 2023.

Please let me know if you have any questions or need any additional information.

Thank you

Rohrer, Angela

From: Birckbichler-Smith, Carrie <cbirckbichler@ecolab.com>
Sent: Wednesday, January 4, 2023 2:11 PM
To: Rohrer, Angela
Cc: Fifth, Michael
Subject: RE: [External] RE: DRAFT NPDES Permit PA0003824 Renewal - Nalco Ellwood City Plant (North & South Plant) - Auth 1304311

Hi Angela,
Thanks for the feedback. I'd like to request a Part C condition be added to authorize Hydrostatic Testing Discharges.

Thank you,
Carrie

Carrie Birckbichler-Smith
EH&S Manager, Ellwood City Plant

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