

Application Type Renewal
Facility Type Industrial
Major / Minor Minor

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

Application No. PA0043826
APS ID 1010260
Authorization ID 1303442

Applicant and Facility Information

Applicant Name	<u>Interstate Chemicals Co. Inc.</u>	Facility Name	<u>United Erie Manufacturing</u>
Applicant Address	<u>2797 Freedland Road</u> <u>Hermitage, PA 16148-9027</u>	Facility Address	<u>1432 Chestnut Street</u> <u>Erie, PA 16502-1705</u>
Applicant Contact	<u>Tom Beatty</u>	Facility Contact	<u>Tom Beatty</u>
Applicant Phone	<u>(724) 981-3771</u>	Facility Phone	<u>(724) 981-3771</u>
Client ID	<u>79934</u>	Site ID	<u>454239</u>
SIC Code	<u>3543</u>	Municipality	<u>Erie City</u>
SIC Description	<u>Manufacturing - Industrial Patterns</u>	County	<u>Erie</u>
Date Application Received	<u>January 24, 2020</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>January 29, 2020</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>NPDES Permit renewal for Industrial Wastewater.</u>		

Summary of Review

This application is for the renewal of an NPDES Permit of an existing minor discharge of non-contact cooling water and stormwater. This primary Industry has a SIC Code 2821 – Plastic Materials & Resins Manufacturing.

A Water Quality Management Permit is not required.

A PPC Plan is not required. The current PPC Plan on file is dated October 22, 2019.

There are no open violations for subject client (79934) as of July 2, 2020.

Erie County Department of health has been notified of high concentrations of TSS and Aluminum.

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.

Approve	Deny	Signatures	Date
X		Jon F. Bucha Jonathan F. Bucha / Civil Engineer Trainee	July 1, 2020
X		Justin C. Dickey Justin C. Dickey, P.E. / Environmental Engineer Manager	July 14, 2020

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	001	Design Flow (MGD)	--
Latitude	42° 7' 4"	Longitude	-80° 5' 25.5"
Quad Name	Erie South	Quad Code	0205
Wastewater Description: Stormwater			
Receiving Waters	City of Erie Storm Sewer to Lake Erie	Stream Code	62245
NHD Com ID	123922704	RMI	-
Drainage Area	-	Yield (cfs/mi ²)	-
Q7-10 Flow (cfs)	-	Q7-10 Basis	-
Elevation (ft)	-	Slope (ft/ft)	-
Watershed No.	15-X	Chapter 93 Class.	WWF
Existing Use	-	Existing Use Qualifier	-
Exceptions to Use	-	Exceptions to Criteria	-
Assessment Status	-		
Cause(s) of Impairment	-		
Source(s) of Impairment	-		
TMDL Status	-	Name	-
Background/Ambient Data		Data Source	
pH (SU)	-		-
Temperature (°F)	-		-
Hardness (mg/L)	-		-
Other:	-		-
Nearest Downstream Public Water Supply Intake		Erie City Water Authority	
PWS Waters	Lake Erie	Flow at Intake (cfs)	-
PWS RMI	-	Distance from Outfall (mi)	-

Changes Since Last Permit Issuance: The Previous permit issuance listed the Pennsylvania/Canadian international boundary as the nearest downstream public water supply. The nearest public water supply in Lake Erie is currently the Erie City Water Authority located just outside of Presque Isle Bay.

Other Comments: Outfall 001 consists of wastewater from suboutfall 101 and stormwater. Outfalls 002, and 003 each have similar wastewater of stormwater only. Outfalls 001, 002, and 003 are No Exposure outfalls. Process water and boiler blowdown are discharged to the Erie Sanitary Sewer. The receiving water is the City of Erie Storm Sewer Tributary to Presque Isle Bay.

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Discharge, Receiving Waters and Water Supply Information			
Outfall No.	<u>002</u>	Design Flow (MGD)	<u>--</u>
Latitude	<u>42° 7' 2.3"</u>	Longitude	<u>-80° 5' 25"</u>
Quad Name	<u>Erie South</u>	Quad Code	<u>0205</u>
Wastewater Description: <u>Stormwater</u>			
Receiving Waters	<u>City of Erie Storm Sewer to Lake Erie</u>	Stream Code	<u>62245</u>
NHD Com ID	<u>123922704</u>	RMI	<u>-</u>
Drainage Area	<u>-</u>	Yield (cfs/mi ²)	<u>-</u>
Q ₇₋₁₀ Flow (cfs)	<u>-</u>	Q ₇₋₁₀ Basis	<u>-</u>
Elevation (ft)	<u>-</u>	Slope (ft/ft)	<u>-</u>
Watershed No.	<u>15-X</u>	Chapter 93 Class.	<u>WWF</u>
Existing Use	<u>-</u>	Existing Use Qualifier	<u>-</u>
Exceptions to Use	<u>-</u>	Exceptions to Criteria	<u>-</u>
Assessment Status	<u>-</u>		
Cause(s) of Impairment	<u>-</u>		
Source(s) of Impairment	<u>-</u>		
TMDL Status	<u>-</u>	Name	<u>-</u>
Background/Ambient Data		Data Source	
pH (SU)	<u>-</u>		<u>-</u>
Temperature (°F)	<u>-</u>		<u>-</u>
Hardness (mg/L)	<u>-</u>		<u>-</u>
Other:	<u>-</u>		<u>-</u>
Nearest Downstream Public Water Supply Intake	<u>Erie City Water Authority</u>		
PWS Waters	<u>-</u>	Flow at Intake (cfs)	<u>-</u>
PWS RMI	<u>-</u>	Distance from Outfall (mi)	<u>-</u>

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Other Comments: Outfall 001 consists of wastewater from suboutfall 101 and stormwater. Outfalls 002, and 003 each have similar wastewater of stormwater only. Outfalls 001, 002, and 003 are No Exposure outfalls. Process water and boiler blowdown are discharged to the Erie Sanitary Sewer. The receiving water is the City of Erie Storm Sewer Tributary to Presque Isle Bay.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	<u>003</u>	Design Flow (MGD)	<u>0</u>
Latitude	<u>42° 7' 5"</u>	Longitude	<u>-80° 5' 18"</u>
Quad Name	<u>Erie South</u>	Quad Code	<u>0205</u>

Wastewater Description: Stormwater

Receiving Waters	<u>City of Erie Storm Sewer to Lake Erie</u>	Stream Code	<u>62245</u>
NHD Com ID	<u>123922704</u>	RMI	<u>-</u>
Drainage Area	<u>-</u>	Yield (cfs/mi ²)	<u>-</u>
Q ₇₋₁₀ Flow (cfs)	<u>-</u>	Q ₇₋₁₀ Basis	<u>-</u>
Elevation (ft)	<u>-</u>	Slope (ft/ft)	<u>-</u>
Watershed No.	<u>15-X</u>	Chapter 93 Class.	<u>WWF</u>
Existing Use	<u>-</u>	Existing Use Qualifier	<u>-</u>
Exceptions to Use	<u>-</u>	Exceptions to Criteria	<u>-</u>

Assessment Status	<u>-</u>
Cause(s) of Impairment	<u>-</u>
Source(s) of Impairment	<u>-</u>
TMDL Status	<u>-</u>
Name	<u>-</u>

Background/Ambient Data	Data Source
pH (SU)	<u>-</u>
Temperature (°F)	<u>-</u>
Hardness (mg/L)	<u>-</u>
Other:	<u>-</u>

Nearest Downstream Public Water Supply Intake	<u>Erie City Water Authority</u>
PWS Waters	<u>Lake Erie</u>
PWS RMI	<u>-</u>
Flow at Intake (cfs)	<u>-</u>
Distance from Outfall (mi)	<u>-</u>

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Discharge, Receiving Waters and Water Supply Information

Suboutfall No.	<u>101</u>	Design Flow (MGD)	<u>.06</u>
Latitude	<u>42° 7' 2.3"</u>	Longitude	<u>-80° 5' 25.5"</u>
Quad Name	<u>Erie South</u>	Quad Code	<u>0205</u>
Wastewater Description: <u>Noncontact Cooling Water (NCCW)</u>			

Receiving Waters	<u>City of Erie Storm Sewer to Lake Erie</u>	Stream Code	<u>62245</u>
NHD Com ID	<u>123922828</u>	RMI	<u>-</u>
Drainage Area	<u>-</u>	Yield (cfs/mi ²)	<u>-</u>
Q ₇₋₁₀ Flow (cfs)	<u>-</u>	Q ₇₋₁₀ Basis	<u>-</u>
Elevation (ft)	<u>-</u>	Slope (ft/ft)	<u>-</u>
Watershed No.	<u>15-X</u>	Chapter 93 Class.	<u>WWF</u>
Existing Use	<u>-</u>	Existing Use Qualifier	<u>-</u>
Exceptions to Use	<u>-</u>	Exceptions to Criteria	<u>-</u>
Assessment Status	<u>-</u>		
Cause(s) of Impairment	<u>-</u>		
Source(s) of Impairment	<u>-</u>		
TMDL Status	<u>-</u>	Name	<u>-</u>

Background/Ambient Data		Data Source	
pH (SU)	<u>-</u>		<u>-</u>
Temperature (°F)	<u>-</u>		<u>-</u>
Hardness (mg/L)	<u>-</u>		<u>-</u>
Other:	<u>-</u>		<u>-</u>

Nearest Downstream Public Water Supply Intake	<u>Erie City Water Authority</u>
PWS Waters	<u>Lake Erie</u>
PWS RMI	<u>-</u>
	Flow at Intake (cfs) <u>-</u>
	Distance from Outfall (mi) <u>-</u>

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Development of Effluent Limitations

Technology-Based Limitations

The following technology-based limitation applies, subject to water quality analysis and BPJ where applicable:

Parameter	Limit (mg/l)	SBC	Federal Regulation	State Regulation
pH	6.0 – 9.0 S.U.	Min – Max	133.102(c)	95.2(1)

Self-Monitoring Requirements for Industrial Dischargers

Waste Stream Type	Parameter	Recommended Sample Type	Minimum Sample Frequency
Non-Contact Cooling Water (20,000 – 100,000 gpd)	Flow	Meter	1/week
	pH	Grab	1/week
	Temperature	I.S.	1/week

Comments: These monitoring requirements are from table 6-4 of the DEP's Technical Guidance for the Development & Specification of Effluent Limitations (362-0400-001). The existing monitoring frequency of 2/month for Temperature is being carried over from the previous permit renewal, due to there being no history of non-compliance.

Additional Considerations

The effluent limitations only apply to suboutfall 101, which receives wastewater from Kettle Jacket Non-Contact Cooling Water. A discharge rate of 0.06 mgd was used in developing effluent limitations. The permittee should be able to meet these limits based on historic DMR data.

No modeling was performed since the discharge goes to the city storm sewer before discharging to the lake, where significant dilution exists.

The Above Ground Storage Chemical Storage tanks utilize transfer valves and are surrounded by an impervious concrete retaining wall, which meets the requirements for No Exposure stormwater outfalls.

Anit-Backsliding

Anti-backsliding does not apply.

Compliance History

DMR Data for Outfall 101 (from May 1, 2019 to April 30, 2020)

Parameter	APR-20	MAR-20	FEB-20	JAN-20	DEC-19	NOV-19	OCT-19	SEP-19	AUG-19	JUL-19	JUN-19	MAY-19
Flow (MGD) Average Monthly	0.00712	0.00717	0.0072	0.00724	0.00728	0.00733	0.00737	0.00750	0.00746	0.00715	0.00724	0.03226
pH (S.U.) Minimum	7.1	6.8	6.9	7.0	7.0	6.8	6.8	6.8	6.8	6.8	6.8	6.8
pH (S.U.) Maximum	7.2	7.4	7.3	7.2	7.3	7.1	7.05	7.2	7.2	7.2	7.5	7.3
Temperature (°F) Daily Average	50.5	49.4	49.75	50	53.5	56.5	66	74.25	81.5	77.0	69.75	65.5

Summary of Inspections: The last inspection was conducted on March 25, 2015 and no violations were noted.

Other Comments: There have been no effluent violations in the past 5 years. An NOV was sent out on January 8, 2020 for submitting a late NPDES permit application package.

Original sampling results were high for the No Exposure parameters: TSS, COD, BOD, and Oil & Grease. Re-sampling for COD, BOD, and Oil & Grease showed that these parameters were at acceptable concentrations. The high TSS concentration at outfalls 002 & 003 are caused by the gravel lot in which they are located. Outfalls 002 & 003 also show slightly high levels of Aluminum being reported currently and in the previous permit cycle.

Proposed Effluent Limitations and Monitoring Requirements

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (362-0400-001), SOPs and/or BPJ.

Outfall 101, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Maximum	Instant. Maximum		
Flow (MGD)	Report	XXX	XXX	XXX	XXX	XXX	Continuous	Measured
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/week	Grab
Temperature (°F)	XXX	XXX	XXX	Report Daily Max	XXX	XXX	2/month	I-S

Compliance Sampling Location: Suboutfall 101 manhole.

Other Comments: Monitoring requirements for Flow, pH, and Temperature are based on Self-Monitoring Requirements for Industrial Dischargers (table 6-4), for non-contact cooling water, of the DEP's Technical Guidance for the Development & Specification of Effluent Limitations (362-0400-001).

