

Application Type Renewal  
 Facility Type Industrial  
 Major / Minor Minor

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

Application No. PA0103250  
 APS ID 1004855  
 Authorization ID 1293986

**Applicant and Facility Information**

|                           |   |                  |  |
|---------------------------|---|------------------|--|
| Applicant Name            | <u>Urlick Foundry Company, Inc.</u>   | Facility Name    | <u>Urlick Foundry</u>                              |
| Applicant Address         | <u>1501 Cherry Street</u><br><u>Erie, PA 16502</u>  | Facility Address | <u>1501 Cherry Street</u><br><u>Erie, PA 16502</u> |
| Applicant Contact         | <u>David Moyer, Plant Engineer</u>  | Facility Contact | <u>David Moyer, Plant Engineer</u>                 |
| Applicant Phone           | <u>(814) 870-5498</u>   | Facility Phone   | <u>(814) 870-5498</u>                              |
| Client ID                 | <u>27646</u>  | Site ID          | <u>130509</u>                                      |
| SIC Code                  | <u>3321</u>   | Municipality     | <u>Erie City</u>                                   |
| SIC Description           | <u>Manufacturing - Gray And Ductile Iron Foundries</u>  | County           | <u>Erie County</u>                                 |
| Date Application Received | <u>September 25, 2019</u>   | EPA Waived?      | <u>Yes</u>   |
| Date Application Accepted | <u>October 30, 2019</u>   | If No, Reason    | <u>-</u>   |
| Purpose of Application    | <u>Renewal of an existing NPDES IW Permit for a discharge of stormwater and Non-Contact Cooling Water (NCCW).</u> |                  |  |

**Summary of Review**

Act 14 - Proof of Notification was submitted and received.

A Part II Water Quality Management permit is not required at this time.

The applicant should be able to meet the limits of this permit, which will protect the uses of the receiving stream.

**I. OTHER REQUIREMENTS:**

- A. Right of Way
- B. Solids Handling
- C. NPDES Permit Supersedes WQM Permits
- D. Modification of Revocation of Permit for changes to BAT or BCT
- E. Total Residual Chlorine (TRC) Optimization and Minimization
- F. Temperature ( $\pm 2^{\circ}\text{C}$ )
- G. No Net Addition of Pollutants To NCCW

**SPECIAL CONDITIONS:**

- II. Chemical Additives
- III. Requirements Applicable to Stormwater Outfalls

There are no open violations in efacts associated with the subject Client ID (27646) as of 12/22/2021.

| Approve | Deny | Signatures  | Date       |
|---------|------|---|------------|
| X       |      | Stephen A. McCauley<br>Stephen A. McCauley, E.I.T. / Environmental Engineering Specialist | 12/22/2021 |
| X       |      | Justin C. Dickey<br>Justin C. Dickey, P.E. / Environmental Engineer Manager               | 12/22/2021 |

**Discharge, Receiving Waters and Water Supply Information**

|  |                      |                   |                      |
|--|----------------------|-------------------|----------------------|
| Outfall No.  | <u>001</u>           | Design Flow (MGD) | <u>0.00</u>          |
| Latitude   | <u>42° 06' 58.0"</u> | Longitude         | <u>80° 05' 44.0"</u> |
| Quad Name  | <u>-</u>             | Quad Code         | <u>-</u>             |
| Wastewater Description: <u>Stormwater, and IMPs 101, 102, and 103.</u> |                      |                   |                      |

|                              |  |                              |            |
|------------------------------|--|------------------------------|------------|
| Receiving Waters             | <u>Unnamed Tributary to the Presque Isle Bay</u> | Stream Code                  | <u>N/A</u> |
| NHD Com ID                   | <u>123926163</u>                                 | RMI                          | <u>N/A</u> |
| Drainage Area                | <u>-</u>   | Yield (cfs/mi <sup>2</sup> ) | <u>-</u>   |
| Q <sub>7-10</sub> Flow (cfs) | <u>-</u>   | Q <sub>7-10</sub> Basis      | <u>-</u>   |
| Elevation (ft)               | <u>-</u>   | Slope (ft/ft)                | <u>-</u>   |
| Watershed No.                | <u>15-A</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>Not Assessed</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>None - Pennsylvania and Canada border</u> |                            |             |
| PWS Waters                                    | <u>Lake Erie</u>                             | Flow at Intake (cfs)       | <u>N/A</u>  |
| PWS RMI                                       | <u>N/A</u>                                   | Distance from Outfall (mi) | <u>13.0</u> |

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.

Outfall 001 consists of stormwater from roof drains, and IMPs 101, 102, and 103. IMP 101 consists of NCCW from the Ajax Holding Furnace during emergency only. IMP 102 consists of NCCW from the ABB Melting Furnaces during emergency only. IMP 103 consists of stormwater from the circulation driveway and parking areas.

Outfall 006 has been determined to be the best representative outfall for Outfalls 001-005, and IMP 103. The sources of stormwater at this facility are from catch basins and roof drains outside of the Industrial Activity of the site. There are no floor drains that lead to the stormwater outfalls. Since Outfall 006 receives the most stormwater from the site, so it was chosen as representative of the stormwater from the entire site. Monitoring for Outfalls 001-005, and IMP 103 will be included in the Draft NPDES Permit, but the Permittee can enter the NODI code of "GG" for the represented outfalls.

**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 001, Effective Period: Permit Effective Date through Permit Expiration Date.**

| Parameter      | Effluent Limitations                |                   |                       |                    |                  |                     | Monitoring Requirements                            |                            |
|----------------|-------------------------------------|-------------------|-----------------------|--------------------|------------------|---------------------|--|----------------------------|
|                | Mass Units (lbs/day) <sup>(1)</sup> |                   | Concentrations (mg/L) |                    |                  |                     | Minimum <sup>(2)</sup><br>Measurement<br>Frequency | Required<br>Sample<br>Type |
|                | Average<br>Monthly                  | Average<br>Weekly | Minimum               | Average<br>Monthly | Daily<br>Maximum | Instant.<br>Maximum |  |                            |
| TSS            | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Aluminum | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Copper   | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Iron     | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Lead     | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Zinc     | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |

Samples taken at the following location: Outfall 001, prior to mixing with any other wastewaters.

Monitoring for Total Suspended Solids, Total Aluminum, Total Zinc, Total Copper, Total Iron, and Total Lead is based on the monitoring requirements for Appendix B facilities set in the PAG-03 General Permit.

**Discharge, Receiving Waters and Water Supply Information**

|           |                      |                   |                       |
|-----------|----------------------|-------------------|-----------------------|
| IMP No.   | <u>101</u>           | Design Flow (MGD) | <u>0.00</u>           |
| Latitude  | <u>42° 07' 0.00"</u> | Longitude         | <u>80° 05' 37.40"</u> |
| Quad Name | <u>-</u>             | Quad Code         | <u>-</u>              |

Wastewater Description: Non-Contact Cooling Water (NCCW)

|                              |  |                              |            |
|------------------------------|--|------------------------------|------------|
| Receiving Waters             | <u>Unnamed Tributary to the Presque Isle Bay</u> | Stream Code                  | <u>N/A</u> |
| NHD Com ID                   | <u>123926163</u>                                 | RMI                          | <u>N/A</u> |
| Drainage Area                | <u>-</u>   | Yield (cfs/mi <sup>2</sup> ) | <u>-</u>   |
| Q <sub>7-10</sub> Flow (cfs) | <u>-</u>   | Q <sub>7-10</sub> Basis      | <u>-</u>   |
| Elevation (ft)               | <u>-</u>   | Slope (ft/ft)                | <u>-</u>   |
| Watershed No.                | <u>15-A</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>Not Assessed</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>None - Pennsylvania and Canada border</u> |                            |             |
| PWS Waters                                    | <u>Lake Erie</u>                             | Flow at Intake (cfs)       | <u>N/A</u>  |
| PWS RMI                                       | <u>N/A</u>                                   | Distance from Outfall (mi) | <u>13.0</u> |

IMP 101 consists of NCCW from the Ajax Holding Furnace during emergency only.

The previous monitoring for PAG-13 stormwater parameters was removed since no stormwater is discharged from this IMP. Monitoring for flow was added due to the NCCW discharge.

No modeling was performed due to the discharge flowing into the Presque Isle Bay through the Erie City storm sewers, the discharge consists only of NCCW, and the discharge is only activated during power outages. The source of the NCCW is from the City of Erie's public water supply, which is monitored. The technology-based limits generally given for NCCW will protect the receiving stream. However, since the discharge flow consists of potable water from the City of Erie, the monitoring requirement for pH is not required at this time.

**Compliance History**

DMR Data for Outfall 101 (from November 1, 2020 to October 31, 2021)

| Parameter                     | OCT-21 | SEP-21 | AUG-21 | JUL-21 | JUN-21 | MAY-21 | APR-21 | MAR-21 | FEB-21 | JAN-21 | DEC-20 | NOV-20 |
|-------------------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| Flow (MGD)<br>Average Monthly |        |        |        |        |        | 00     |        |        |        | 00     |        | 0.002  |

**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.

**IMP 101, Effective Period: Permit Effective Date through Permit Expiration Date.**

| Parameter  | Effluent Limitations |     |                       |                 |     |                  | Monitoring Requirements       |                      |
|------------|----------------------|-----|-----------------------|-----------------|-----|------------------|-------------------------------|----------------------|
|            | Mass Units (lbs/day) |     | Concentrations (mg/L) |                 |     |                  | Minimum Measurement Frequency | Required Sample Type |
|            | Average Monthly      |     | Minimum               | Average Monthly |     | Instant. Maximum |                               |                      |
| Flow (MGD) | Report               | XXX | XXX                   | XXX             | XXX | XXX              | Continuous                    | Metered              |

Samples taken at the following location: IMP 101, prior to mixing with any other wastewaters.

Flow is monitor only based on Chapter 92a.61.

**Discharge, Receiving Waters and Water Supply Information**

|           |                       |                   |                       |
|-----------|-----------------------|-------------------|-----------------------|
| IMP No.   | <u>102</u>            | Design Flow (MGD) | <u>0.00</u>           |
| Latitude  | <u>42° 06' 59.40"</u> | Longitude         | <u>80° 05' 39.20"</u> |
| Quad Name | <u>-</u>              | Quad Code         | <u>-</u>              |

Wastewater Description: Non-Contact Cooling Water (NCCW)

|                              |  |                              |            |
|------------------------------|--|------------------------------|------------|
| Receiving Waters             | <u>Unnamed Tributary to the Presque Isle Bay</u> | Stream Code                  | <u>N/A</u> |
| NHD Com ID                   | <u>123926163</u>                                 | RMI                          | <u>N/A</u> |
| Drainage Area                | <u>-</u>   | Yield (cfs/mi <sup>2</sup> ) | <u>-</u>   |
| Q <sub>7-10</sub> Flow (cfs) | <u>-</u>   | Q <sub>7-10</sub> Basis      | <u>-</u>   |
| Elevation (ft)               | <u>-</u>   | Slope (ft/ft)                | <u>-</u>   |
| Watershed No.                | <u>15-A</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 Not Assessed

Cause(s) of Impairment -

Source(s) of Impairment -

TMDL Status - Name -

| 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 None - Pennsylvania and Canada border

|            |                  |                            |             |
|------------|------------------|----------------------------|-------------|
| PWS Waters | <u>Lake Erie</u> | Flow at Intake (cfs)       | <u>N/A</u>  |
| PWS RMI    | <u>N/A</u>       | Distance from Outfall (mi) | <u>13.0</u> |

IMP 102 consists of NCCW from the ABB Melting Furnaces during emergency only.

No modeling was performed due to the discharge flowing into the Presque Isle Bay through the Erie City storm sewers, the discharge consists only of NCCW, and the discharge is only activated during power outages. The source of the NCCW is from the City of Erie's public water supply, which is monitored. The technology-based limits generally given for NCCW will protect the receiving stream. However, since the discharge flow consists of potable water from the City of Erie, the monitoring requirement for pH is not required at this time.

**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) and/or BPJ.

**IMP 102, Effective Period: Permit Effective Date through Permit Expiration Date**

| Parameter  | Effluent Limitations |     |                       |                 |     |                  | Monitoring Requirements       |                      |
|------------|----------------------|-----|-----------------------|-----------------|-----|------------------|-------------------------------|----------------------|
|            | Mass Units (lbs/day) |     | Concentrations (mg/L) |                 |     |                  | Minimum Measurement Frequency | Required Sample Type |
|            | Average Monthly      |     | Minimum               | Average Monthly |     | Instant. Maximum |                               |                      |
| Flow (MGD) | Report               | XXX | XXX                   | XXX             | XXX | XXX              | Continuous                    | Metered              |

Samples taken at the following location: IMP 102, prior to mixing with any other wastewaters.

Flow is monitor only based on Chapter 92a.61.

**Discharge, Receiving Waters and Water Supply Information**

|   |  |                              |                       |
|---|--|------------------------------|-----------------------|
| IMP No.                                       | <u>103</u>                                       | Design Flow (MGD)            | <u>0.00</u>           |
| Latitude                                      | <u>42° 06' 58.80"</u>                            | Longitude                    | <u>80° 05' 42.30"</u> |
| Quad Name                                     | <u>-</u>   | Quad Code                    | <u>-</u>              |
| Wastewater Description: <u>Stormwater</u>     |  |                              |                       |
| Receiving Waters                              | <u>Unnamed Tributary to the Presque Isle Bay</u> | Stream Code                  | <u>N/A</u>            |
| NHD Com ID                                    | <u>123926163</u>                                 | RMI                          | <u>N/A</u>            |
| Drainage Area                                 | <u>-</u>   | Yield (cfs/mi <sup>2</sup> ) | <u>-</u>              |
| Q <sub>7-10</sub> Flow (cfs)                  | <u>-</u>   | Q <sub>7-10</sub> Basis      | <u>-</u>              |
| Elevation (ft)                                | <u>-</u>   | Slope (ft/ft)                | <u>-</u>              |
| Watershed No.                                 | <u>15-A</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>Not Assessed</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>None - Pennsylvania and Canada border</u>     |                              |                       |
| PWS Waters                                    | <u>Lake Erie</u>                                 | Flow at Intake (cfs)         | <u>N/A</u>            |
| PWS RMI                                       | <u>N/A</u>                                       | Distance from Outfall (mi)   | <u>13.0</u>           |

IMP 103 consists of stormwater from the circulation driveway and parking areas.

Outfall 006 has been determined to be the best representative outfall for Outfalls 001-005, and IMP 103. The sources of stormwater at this facility are from catch basins and roof drains outside of the Industrial Activity of the site. There are no floor drains that lead to the stormwater outfalls. Since Outfall 006 receives the most stormwater from the site, so it was chosen as representative of the stormwater from the entire site. Monitoring for Outfalls 001-005, and IMP 103 will be included in the Draft NPDES Permit, but the Permittee can enter the NODI code of "GG" for the represented outfalls.



**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.

**IMP 103, Effective Period: Permit Effective Date through Permit Expiration Date.**

| Parameter      | Effluent Limitations                |                   |                       |                    |                  |                     | Monitoring Requirements                            |                            |
|----------------|-------------------------------------|-------------------|-----------------------|--------------------|------------------|---------------------|--|----------------------------|
|                | Mass Units (lbs/day) <sup>(1)</sup> |                   | Concentrations (mg/L) |                    |                  |                     | Minimum <sup>(2)</sup><br>Measurement<br>Frequency | Required<br>Sample<br>Type |
|                | Average<br>Monthly                  | Average<br>Weekly | Minimum               | Average<br>Monthly | Daily<br>Maximum | Instant.<br>Maximum |  |                            |
| TSS            | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Aluminum | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Copper   | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Iron     | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Lead     | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Zinc     | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |

Samples taken at the following location: IMP 103, prior to mixing with any other wastewaters.

Monitoring for Total Suspended Solids, Total Aluminum, Total Zinc, Total Copper, Total Iron, and Total Lead is based on the monitoring requirements for Appendix B facilities set in the PAG-03 General Permit.

**Discharge, Receiving Waters and Water Supply Information**

|  |                       |                   |                       |
|--|-----------------------|-------------------|-----------------------|
| Outfall No.  | <u>002</u>            | Design Flow (MGD) | <u>0.00</u>           |
| Latitude   | <u>42° 06' 58.00"</u> | Longitude         | <u>80° 05' 35.00"</u> |
| Quad Name  | <u>-</u>              | Quad Code         | <u>-</u>              |
| Wastewater Description: <u>Stormwater, and IMPs 201 and 202.</u> |                       |                   |                       |

|                   |  |                              |            |
|-------------------|--|------------------------------|------------|
| Receiving Waters  | <u>Unnamed Tributary to the Presque Isle Bay</u> | Stream Code                  | <u>N/A</u> |
| NHD Com ID        | <u>123926163</u>                                 | RMI                          | <u>N/A</u> |
| Drainage Area     | <u>-</u>   | Yield (cfs/mi <sup>2</sup> ) | <u>-</u>   |
| Q7-10 Flow (cfs)  | <u>-</u>   | Q7-10 Basis                  | <u>-</u>   |
| Elevation (ft)    | <u>-</u>   | Slope (ft/ft)                | <u>-</u>   |
| Watershed No.     | <u>15-A</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>Not Assessed</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>None - Pennsylvania and Canada border</u> |                            |             |
| PWS Waters                                    | <u>Lake Erie</u>                             | Flow at Intake (cfs)       | <u>N/A</u>  |
| PWS RMI                                       | <u>N/A</u>                                   | Distance from Outfall (mi) | <u>13.0</u> |

Outfall 002 consists of stormwater from roof drains and IMP 202. IMP 202 consists of stormwater from roof drains, emergency only NCCW from the Asea Pouring furnace, and IMP 201. IMP 201 consists of stormwater from roof drains and emergency only NCCW from the shell core machines and the back-up compressed air drier.

Outfall 006 has been determined to be the best representative outfall for Outfalls 001-005, and IMP 103. The sources of stormwater at this facility are from catch basins and roof drains outside of the Industrial Activity of the site. There are no floor drains that lead to the stormwater outfalls. Since Outfall 006 receives the most stormwater from the site, so it was chosen as representative of the stormwater from the entire site. Monitoring for Outfalls 001-005, and IMP 103 will be included in the Draft NPDES Permit, but the Permittee can enter the NODI code of "GG" for the represented outfalls.

**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 002, Effective Period: Permit Effective Date through Permit Expiration Date.**

| Parameter      | Effluent Limitations                |                |                       |                 |               |                  | Monitoring Requirements                      |                      |
|----------------|-------------------------------------|----------------|-----------------------|-----------------|---------------|------------------|--|----------------------|
|                | Mass Units (lbs/day) <sup>(1)</sup> |                | Concentrations (mg/L) |                 |               |                  | Minimum <sup>(2)</sup> Measurement Frequency | Required Sample Type |
|                | Average Monthly                     | Average Weekly | Minimum               | Average Monthly | Daily Maximum | Instant. Maximum |  |                      |
| TSS            | XXX                                 | XXX            | XXX                   | XXX             | Report        | XXX              | 1/6 months                                   | Grab                 |
| Total Aluminum | XXX                                 | XXX            | XXX                   | XXX             | Report        | XXX              | 1/6 months                                   | Grab                 |
| Total Copper   | XXX                                 | XXX            | XXX                   | XXX             | Report        | XXX              | 1/6 months                                   | Grab                 |
| Total Iron     | XXX                                 | XXX            | XXX                   | XXX             | Report        | XXX              | 1/6 months                                   | Grab                 |
| Total Lead     | XXX                                 | XXX            | XXX                   | XXX             | Report        | XXX              | 1/6 months                                   | Grab                 |
| Total Zinc     | XXX                                 | XXX            | XXX                   | XXX             | Report        | XXX              | 1/6 months                                   | Grab                 |

Samples taken at the following location: Outfall 002, prior to mixing with any other wastewaters.

Monitoring for Total Suspended Solids, Total Aluminum, Total Zinc, Total Copper, Total Iron, and Total Lead is based on the monitoring requirements for Appendix B facilities set in the PAG-03 General Permit.

**Discharge, Receiving Waters and Water Supply Information**

|           |                       |                   |                       |
|-----------|-----------------------|-------------------|-----------------------|
| IMP No.   | <u>201</u>            | Design Flow (MGD) | <u>0.00</u>           |
| Latitude  | <u>42° 06' 58.50"</u> | Longitude         | <u>80° 05' 35.50"</u> |
| Quad Name | <u>-</u>              | Quad Code         | <u>-</u>              |

Wastewater Description: Stormwater and Non-Contact Cooling Water (NCCW)

|                              |  |                              |            |
|------------------------------|--|------------------------------|------------|
| Receiving Waters             | <u>Unnamed Tributary to the Presque Isle Bay</u> | Stream Code                  | <u>N/A</u> |
| NHD Com ID                   | <u>123926163</u>                                 | RMI                          | <u>N/A</u> |
| Drainage Area                | <u>-</u>   | Yield (cfs/mi <sup>2</sup> ) | <u>-</u>   |
| Q <sub>7-10</sub> Flow (cfs) | <u>-</u>   | Q <sub>7-10</sub> Basis      | <u>-</u>   |
| Elevation (ft)               | <u>-</u>   | Slope (ft/ft)                | <u>-</u>   |
| Watershed No.                | <u>15-A</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>Not Assessed</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>None - Pennsylvania and Canada border</u> |                            |             |
| PWS Waters                                    | <u>Lake Erie</u>                             | Flow at Intake (cfs)       | <u>N/A</u>  |
| PWS RMI                                       | <u>N/A</u>                                   | Distance from Outfall (mi) | <u>13.0</u> |

IMP 201 currently consists of stormwater from roof drains, and emergency only NCCW from the Shell Core Machines and the back-up compressed air drier.

The Air Dryer that discharges to this IMP is now used as a backup to a new Air Dryer that will not discharge any cooling water.

The Shell Core Machines and related cooling equipment are planned to be moved to the building east of Cherry Street (Outfall 006) in the Spring of 2022. No changes to the limits will be necessary as only flow is measured, and the remaining back up compressed air dryer would still be required to be monitored when a discharge occurs.

No modeling was performed due to the discharge flowing into the Presque Isle Bay through the Erie City storm sewers, the discharge consists only of NCCW, and the discharge is only activated during power outages. The source of the NCCW is from the City of Erie's public water supply, which is monitored. The technology-based limits generally given for NCCW will protect the receiving stream. However, since the discharge flow consists of potable water from the City of Erie, the monitoring requirement for pH is not required at this time.

**Compliance History**

**DMR Data for Outfall 201 (from November 1, 2020 to October 31, 2021)**

| Parameter                     | OCT-21 | SEP-21 | AUG-21 | JUL-21 | JUN-21 | MAY-21 | APR-21 | MAR-21 | FEB-21 | JAN-21 | DEC-20 | NOV-20 |
|-------------------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| Flow (MGD)<br>Average Monthly |        |        |        |        |        | 00     |        |        |        | 0.0067 |        | 0.001  |

**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) and/or BPJ.

**IMP 201, Effective Period: Permit Effective Date through Permit Expiration Date**

| Parameter              | Effluent Limitations                |                   |                       |                    |                  |                     | Monitoring Requirements                            |                            |
|------------------------|-------------------------------------|-------------------|-----------------------|--------------------|------------------|---------------------|--|----------------------------|
|                        | Mass Units (lbs/day) <sup>(1)</sup> |                   | Concentrations (mg/L) |                    |                  |                     | Minimum <sup>(2)</sup><br>Measurement<br>Frequency | Required<br>Sample<br>Type |
|                        | Average<br>Monthly                  | Average<br>Weekly | Minimum               | Average<br>Monthly | Daily<br>Maximum | Instant.<br>Maximum |  |                            |
| Flow (MGD)             | Report                              | XXX               | XXX                   | XXX                | XXX              | XXX                 | Continuous   | Metered                    |
| Total Suspended Solids | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Aluminum         | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Zinc             | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Copper           | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Iron             | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Lead             | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |

Samples taken at the following location: IMP 201, prior to mixing with any other wastewaters.

Flow is monitor only based on Chapter 92a.61. Monitoring for Total Suspended Solids, Total Aluminum, Total Zinc, Total Copper, Total Iron, and Total Lead is based on the monitoring requirements for Appendix B facilities set in the PAG-03 General Permit.

**Discharge, Receiving Waters and Water Supply Information**

|           |                       |                   |                       |
|-----------|-----------------------|-------------------|-----------------------|
| IMP No.   | <u>202</u>            | Design Flow (MGD) | <u>0.00</u>           |
| Latitude  | <u>42° 06' 58.50"</u> | Longitude         | <u>80° 05' 35.50"</u> |
| Quad Name | <u>-</u>              | Quad Code         | <u>-</u>              |

Wastewater Description: Stormwater and Non-Contact Cooling Water (NCCW)

|                              |  |                              |            |
|------------------------------|--|------------------------------|------------|
| Receiving Waters             | <u>Unnamed Tributary to the Presque Isle Bay</u> | Stream Code                  | <u>N/A</u> |
| NHD Com ID                   | <u>123926163</u>                                 | RMI                          | <u>N/A</u> |
| Drainage Area                | <u>-</u>   | Yield (cfs/mi <sup>2</sup> ) | <u>-</u>   |
| Q <sub>7-10</sub> Flow (cfs) | <u>-</u>   | Q <sub>7-10</sub> Basis      | <u>-</u>   |
| Elevation (ft)               | <u>-</u>   | Slope (ft/ft)                | <u>-</u>   |
| Watershed No.                | <u>15-A</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>Not Assessed</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>None - Pennsylvania and Canada border</u> |                            |             |
| PWS Waters                                    | <u>Lake Erie</u>                             | Flow at Intake (cfs)       | <u>N/A</u>  |
| PWS RMI                                       | <u>N/A</u>                                   | Distance from Outfall (mi) | <u>13.0</u> |

IMP 202 consists of stormwater from roof drains, emergency only NCCW from the Asea Pouring furnace, and IMP 201.

No modeling was performed due to the discharge flowing into the Presque Isle Bay through the Erie City storm sewers, and the discharge is NCCW. The source of the NCCW is from the City of Erie's public water supply, which is monitored. The technology-based limits generally given for NCCW will protect the receiving stream.

Due to the industrial waste-related nature of this discharge, sampling was included to ensure the discharge meets the requirements for Non-Contact Cooling Water (NCCW). However, since the discharge flow consists of potable water from the City of Erie, the monitoring requirement for pH is not required at this time.

**Compliance History**

**DMR Data for Outfall 202 (from November 1, 2020 to October 31, 2021)**

| Parameter                     | OCT-21 | SEP-21 | AUG-21 | JUL-21 | JUN-21 | MAY-21 | APR-21 | MAR-21 | FEB-21 | JAN-21 | DEC-20 | NOV-20 |
|-------------------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| Flow (MGD)<br>Average Monthly |        |        |        |        |        | 0.027  |        |        |        | 0.0074 |        | 0.008  |

**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) and/or BPJ.

**IMP 202, Effective Period: Permit Effective Date through Permit Expiration Date**

| Parameter              | Effluent Limitations                |                   |                       |                    |                  |                     | Monitoring Requirements                            |                            |
|------------------------|-------------------------------------|-------------------|-----------------------|--------------------|------------------|---------------------|--|----------------------------|
|                        | Mass Units (lbs/day) <sup>(1)</sup> |                   | Concentrations (mg/L) |                    |                  |                     | Minimum <sup>(2)</sup><br>Measurement<br>Frequency | Required<br>Sample<br>Type |
|                        | Average<br>Monthly                  | Average<br>Weekly | Minimum               | Average<br>Monthly | Daily<br>Maximum | Instant.<br>Maximum |  |                            |
| Flow (MGD)             | Report                              | XXX               | XXX                   | XXX                | XXX              | XXX                 | Continuous   | Metered                    |
| Total Suspended Solids | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Aluminum         | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Zinc             | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Copper           | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Iron             | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Lead             | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |

Samples taken at the following location: IMP 202, prior to mixing with any other wastewaters.

Flow is monitor only based on Chapter 92a.61. Monitoring for Total Suspended Solids, Total Aluminum, Total Zinc, Total Copper, Total Iron, and Total Lead is based on the monitoring requirements for Appendix B facilities set in the PAG-03 General Permit.

**Discharge, Receiving Waters and Water Supply Information**

|   |  |                              |                      |
|---|--|------------------------------|----------------------|
| Outfall No.                                   | <u>003</u>                                       | Design Flow (MGD)            | <u>0.00</u>          |
| Latitude                                      | <u>42° 06' 58.0"</u>                             | Longitude                    | <u>80° 05' 41.0"</u> |
| Quad Name                                     | <u>-</u>   | Quad Code                    | <u>-</u>             |
| Wastewater Description: <u>Stormwater</u>     |  |                              |                      |
| Receiving Waters                              | <u>Unnamed Tributary to the Presque Isle Bay</u> | Stream Code                  | <u>N/A</u>           |
| NHD Com ID                                    | <u>123926163</u>                                 | RMI                          | <u>N/A</u>           |
| Drainage Area                                 | <u>-</u>   | Yield (cfs/mi <sup>2</sup> ) | <u>-</u>             |
| Q <sub>7-10</sub> Flow (cfs)                  | <u>-</u>   | Q <sub>7-10</sub> Basis      | <u>-</u>             |
| Elevation (ft)                                | <u>-</u>   | Slope (ft/ft)                | <u>-</u>             |
| Watershed No.                                 | <u>15-A</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>Not Assessed</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>None - Pennsylvania and Canada border</u>     |                              |                      |
| PWS Waters                                    | <u>Lake Erie</u>                                 | Flow at Intake (cfs)         | <u>N/A</u>           |
| PWS RMI                                       | <u>N/A</u>                                       | Distance from Outfall (mi)   | <u>13.0</u>          |

Outfall 003 consists of stormwater from roof drains.

Outfall 006 has been determined to be the best representative outfall for Outfalls 001-005, and IMP 103. The sources of stormwater at this facility are from catch basins and roof drains outside of the Industrial Activity of the site. There are no floor drains that lead to the stormwater outfalls. Since Outfall 006 receives the most stormwater from the site, so it was chosen as representative of the stormwater from the entire site. Monitoring for Outfalls 001-005, and IMP 103 will be included in the Draft NPDES Permit, but the Permittee can enter the NODI code of "GG" for the represented outfalls.



**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 003, Effective Period: Permit Effective Date through Permit Expiration Date.**

| Parameter      | Effluent Limitations                |                   |                       |                    |                  |                     | Monitoring Requirements                            |                            |
|----------------|-------------------------------------|-------------------|-----------------------|--------------------|------------------|---------------------|--|----------------------------|
|                | Mass Units (lbs/day) <sup>(1)</sup> |                   | Concentrations (mg/L) |                    |                  |                     | Minimum <sup>(2)</sup><br>Measurement<br>Frequency | Required<br>Sample<br>Type |
|                | Average<br>Monthly                  | Average<br>Weekly | Minimum               | Average<br>Monthly | Daily<br>Maximum | Instant.<br>Maximum |  |                            |
| TSS            | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Aluminum | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Copper   | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Iron     | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Lead     | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Zinc     | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |

Samples taken at the following location: Outfall 003, prior to mixing with any other wastewaters.

Monitoring for Total Suspended Solids, Total Aluminum, Total Zinc, Total Copper, Total Iron, and Total Lead is based on the monitoring requirements for Appendix B facilities set in the PAG-03 General Permit.

**Discharge, Receiving Waters and Water Supply Information**

|   |                      |                   |                       |
|---|----------------------|-------------------|-----------------------|
| Outfall No.                               | <u>004</u>           | Design Flow (MGD) | <u>0.00</u>           |
| Latitude                                  | <u>42° 07' 0.00"</u> | Longitude         | <u>80° 05' 36.20"</u> |
| Quad Name                                 | <u>-</u>             | Quad Code         | <u>-</u>              |
| Wastewater Description: <u>Stormwater</u> |                      |                   |                       |

|                              |  |                              |            |
|------------------------------|--|------------------------------|------------|
| Receiving Waters             | <u>Unnamed Tributary to the Presque Isle Bay</u> | Stream Code                  | <u>N/A</u> |
| NHD Com ID                   | <u>123926163</u>                                 | RMI                          | <u>N/A</u> |
| Drainage Area                | <u>-</u>   | Yield (cfs/mi <sup>2</sup> ) | <u>-</u>   |
| Q <sub>7-10</sub> Flow (cfs) | <u>-</u>   | Q <sub>7-10</sub> Basis      | <u>-</u>   |
| Elevation (ft)               | <u>-</u>   | Slope (ft/ft)                | <u>-</u>   |
| Watershed No.                | <u>15-A</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>Not Assessed</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>None - Pennsylvania and Canada border</u> |                            |             |
| PWS Waters                                    | <u>Lake Erie</u>                             | Flow at Intake (cfs)       | <u>N/A</u>  |
| PWS RMI                                       | <u>N/A</u>                                   | Distance from Outfall (mi) | <u>13.0</u> |

Outfall 004 consists of stormwater from roof drains, driveway catch basin, and vegetated areas.

Outfall 006 has been determined to be the best representative outfall for Outfalls 001-005, and IMP 103. The sources of stormwater at this facility are from catch basins and roof drains outside of the Industrial Activity of the site. There are no floor drains that lead to the stormwater outfalls. Since Outfall 006 receives the most stormwater from the site, so it was chosen as representative of the stormwater from the entire site. Monitoring for Outfalls 001-005, and IMP 103 will be included in the Draft NPDES Permit, but the Permittee can enter the NODI code of "GG" for the represented outfalls.

**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 004, Effective Period: Permit Effective Date through Permit Expiration Date.**

| Parameter      | Effluent Limitations                |                |                       |                 |               |                  | Monitoring Requirements                      |                      |
|----------------|-------------------------------------|----------------|-----------------------|-----------------|---------------|------------------|--|----------------------|
|                | Mass Units (lbs/day) <sup>(1)</sup> |                | Concentrations (mg/L) |                 |               |                  | Minimum <sup>(2)</sup> Measurement Frequency | Required Sample Type |
|                | Average Monthly                     | Average Weekly | Minimum               | Average Monthly | Daily Maximum | Instant. Maximum |  |                      |
| TSS            | XXX                                 | XXX            | XXX                   | XXX             | Report        | XXX              | 1/6 months                                   | Grab                 |
| Total Aluminum | XXX                                 | XXX            | XXX                   | XXX             | Report        | XXX              | 1/6 months                                   | Grab                 |
| Total Copper   | XXX                                 | XXX            | XXX                   | XXX             | Report        | XXX              | 1/6 months                                   | Grab                 |
| Total Iron     | XXX                                 | XXX            | XXX                   | XXX             | Report        | XXX              | 1/6 months                                   | Grab                 |
| Total Lead     | XXX                                 | XXX            | XXX                   | XXX             | Report        | XXX              | 1/6 months                                   | Grab                 |
| Total Zinc     | XXX                                 | XXX            | XXX                   | XXX             | Report        | XXX              | 1/6 months                                   | Grab                 |

Samples taken at the following location: Outfall 004, prior to mixing with any other wastewaters.

Monitoring for Total Suspended Solids, Total Aluminum, Total Zinc, Total Copper, Total Iron, and Total Lead is based on the monitoring requirements for Appendix B facilities set in the PAG-03 General Permit.

**Discharge, Receiving Waters and Water Supply Information**

|   |                       |                   |                      |
|---|-----------------------|-------------------|----------------------|
| Outfall No.                               | <u>005</u>            | Design Flow (MGD) | <u>0.00</u>          |
| Latitude                                  | <u>42° 06' 58.00"</u> | Longitude         | <u>80° 05' 34.2"</u> |
| Quad Name                                 | <u>-</u>              | Quad Code         | <u>-</u>             |
| Wastewater Description: <u>Stormwater</u> |                       |                   |                      |

|                              |  |                              |            |
|------------------------------|--|------------------------------|------------|
| Receiving Waters             | <u>Unnamed Tributary to the Presque Isle Bay</u> | Stream Code                  | <u>N/A</u> |
| NHD Com ID                   | <u>123926163</u>                                 | RMI                          | <u>N/A</u> |
| Drainage Area                | <u>-</u>   | Yield (cfs/mi <sup>2</sup> ) | <u>-</u>   |
| Q <sub>7-10</sub> Flow (cfs) | <u>-</u>   | Q <sub>7-10</sub> Basis      | <u>-</u>   |
| Elevation (ft)               | <u>-</u>   | Slope (ft/ft)                | <u>-</u>   |
| Watershed No.                | <u>15-A</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>Not Assessed</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>None - Pennsylvania and Canada border</u> |                            |             |
| PWS Waters                                    | <u>Lake Erie</u>                             | Flow at Intake (cfs)       | <u>N/A</u>  |
| PWS RMI                                       | <u>N/A</u>                                   | Distance from Outfall (mi) | <u>13.0</u> |

Outfall 005 consists of stormwater from the paved parking area.

Outfall 006 has been determined to be the best representative outfall for Outfalls 001-005, and IMP 103. The sources of stormwater at this facility are from catch basins and roof drains outside of the Industrial Activity of the site. There are no floor drains that lead to the stormwater outfalls. Since Outfall 006 receives the most stormwater from the site, so it was chosen as representative of the stormwater from the entire site. Monitoring for Outfalls 001-005, and IMP 103 will be included in the Draft NPDES Permit, but the Permittee can enter the NODI code of "GG" for the represented outfalls.

**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 005, Effective Period: Permit Effective Date through Permit Expiration Date.**

| Parameter      | Effluent Limitations                |                   |                       |                    |                  |                     | Monitoring Requirements                            |                            |
|----------------|-------------------------------------|-------------------|-----------------------|--------------------|------------------|---------------------|--|----------------------------|
|                | Mass Units (lbs/day) <sup>(1)</sup> |                   | Concentrations (mg/L) |                    |                  |                     | Minimum <sup>(2)</sup><br>Measurement<br>Frequency | Required<br>Sample<br>Type |
|                | Average<br>Monthly                  | Average<br>Weekly | Minimum               | Average<br>Monthly | Daily<br>Maximum | Instant.<br>Maximum |  |                            |
| TSS            | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Aluminum | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Copper   | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Iron     | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Lead     | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Zinc     | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |

Samples taken at the following location: Outfall 005, prior to mixing with any other wastewaters.

Monitoring for Total Suspended Solids, Total Aluminum, Total Zinc, Total Copper, Total Iron, and Total Lead is based on the monitoring requirements for Appendix B facilities set in the PAG-03 General Permit.

**Discharge, Receiving Waters and Water Supply Information**

|             |                       |                   |                       |
|-------------|-----------------------|-------------------|-----------------------|
| Outfall No. | <u>006</u>            | Design Flow (MGD) | <u>0.00</u>           |
| Latitude    | <u>42° 06' 58.00"</u> | Longitude         | <u>80° 05' 35.00"</u> |
| Quad Name   | <u>-</u>              | Quad Code         | <u>-</u>              |

Wastewater Description: Stormwater and Non-Contact Cooling Water (NCCW)

|                              |  |                              |            |
|------------------------------|--|------------------------------|------------|
| Receiving Waters             | <u>Unnamed Tributary to the Presque Isle Bay</u> | Stream Code                  | <u>N/A</u> |
| NHD Com ID                   | <u>123926163</u>                                 | RMI                          | <u>N/A</u> |
| Drainage Area                | <u>-</u>   | Yield (cfs/mi <sup>2</sup> ) | <u>-</u>   |
| Q <sub>7-10</sub> Flow (cfs) | <u>-</u>   | Q <sub>7-10</sub> Basis      | <u>-</u>   |
| Elevation (ft)               | <u>-</u>   | Slope (ft/ft)                | <u>-</u>   |
| Watershed No.                | <u>15-A</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 Not Assessed

Cause(s) of Impairment -

Source(s) of Impairment -

TMDL Status - Name -

| 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 None - Pennsylvania and Canada border

|            |                  |                            |             |
|------------|------------------|----------------------------|-------------|
| PWS Waters | <u>Lake Erie</u> | Flow at Intake (cfs)       | <u>N/A</u>  |
| PWS RMI    | <u>N/A</u>       | Distance from Outfall (mi) | <u>13.0</u> |

Outfall 006 currently consists of stormwater from roof drains, paved employee parking areas, and vegetated areas.

The Shell Core Machines and related cooling equipment are planned to be moved to the building east of Cherry Street (Outfall 006) in the Spring of 2022. The discharge was previously directed to IMP 201. In anticipation of the addition of the Shell Core Machines and related cooling equipment (NCCW), monitoring for flow was added to the limits for Outfall 006.

Outfall 006 will remain the representative testing spot for all stormwater. The stormwater samples will be collected when there is no NCCW being discharged.

Outfall 006 has been determined to be the best representative outfall for Outfalls 001-005, and IMP 103. The sources of stormwater at this facility are from catch basins and roof drains outside of the Industrial Activity of the site. There are no floor drains that lead to the stormwater outfalls. Since Outfall 006 receives the most stormwater from the site, so it was chosen as representative of the stormwater from the entire site. Monitoring for Outfalls 001-005, and IMP 103 will be included in the Draft NPDES Permit, but the Permittee can enter the NODI code of "GG" for the represented outfalls.

**Compliance History**

**DMR Data for Outfall 006 (from November 1, 2020 to October 31, 2021)**

| Parameter                              | OCT-21 | SEP-21 | AUG-21 | JUL-21 | JUN-21 | MAY-21 | APR-21 | MAR-21 | FEB-21 | JAN-21 | DEC-20 | NOV-20 |
|--|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| TSS (mg/L)<br>Daily Maximum            |        |        |        |        | 84     |        |        |        |        |        | 11     |        |
| Total Aluminum (mg/L)<br>Daily Maximum |        |        |        |        | 3.8    |        |        |        |        |        | 1.65   |        |
| Total Copper (mg/L)<br>Daily Maximum   |        |        |        |        | 0.139  |        |        |        |        |        | 0.021  |        |
| Total Iron (mg/L)<br>Daily Maximum     |        |        |        |        | 15.7   |        |        |        |        |        | 1.92   |        |
| Total Lead (mg/L)<br>Daily Maximum     |        |        |        |        | 0.0244 |        |        |        |        |        | 4.83   |        |
| Total Zinc (mg/L)<br>Daily Maximum     |        |        |        |        | 0.291  |        |        |        |        |        | 0.030  |        |

**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 006, Effective Period: Permit Effective Date through Permit Expiration Date.**

| Parameter      | Effluent Limitations                |                   |                       |                    |                  |                     | Monitoring Requirements                            |                            |
|----------------|-------------------------------------|-------------------|-----------------------|--------------------|------------------|---------------------|--|----------------------------|
|                | Mass Units (lbs/day) <sup>(1)</sup> |                   | Concentrations (mg/L) |                    |                  |                     | Minimum <sup>(2)</sup><br>Measurement<br>Frequency | Required<br>Sample<br>Type |
|                | Average<br>Monthly                  | Average<br>Weekly | Minimum               | Average<br>Monthly | Daily<br>Maximum | Instant.<br>Maximum |  |                            |
| Flow (MGD)     | Report                              | XXX               | XXX                   | XXX                | XXX              | XXX                 | Continuous   | Metered                    |
| TSS            | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Aluminum | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Copper   | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Iron     | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Lead     | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |
| Total Zinc     | XXX                                 | XXX               | XXX                   | XXX                | Report           | XXX                 | 1/6 months   | Grab                       |

Samples taken at the following location: Outfall 006, prior to mixing with any other wastewaters.

Flow is monitor only based on Chapter 92a.61. Monitoring for Total Suspended Solids, Total Aluminum, Total Zinc, Total Copper, Total Iron, and Total Lead is based on the monitoring requirements for Appendix B facilities set in the PAG-03 General Permit.