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DEPARTMENT OF ENVIRONMENTAL PROTECTION

Northwest Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0253006**
Facility Type	**Industrial**	APS ID	**1014683**
Major / Minor	**Minor**	Authorization ID	**1311125**

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

Applicant and Facility Information

Applicant Name	**Cook, Inc.**	Facility Name	**Cook Vandergrift**
Applicant Address	1186 Montgomery Lane	Facility Address	1186 Montgomery Lane
	Vandergrift, PA 15690		Vandergrift, PA 15690
Applicant Contact	Andrew Clevenger	Facility Contact	Andrew Clevenger
Applicant Phone	(724) 845-8621	Facility Phone	(724) 845-8621
Client ID	307309	Site ID	655285
SIC Code	3841	Municipality	Parks Township
SIC Description	Manufacturing - Surgical and Medical Instruments	County	Armstrong County
Date Application Received	March 31, 2020	EPA Waived?	Yes
Date Application Accepted	April 15, 2020	If No, Reason	-
Purpose of Application	The application is for a renewal of an NPDES permit for an existing discharge of treated Industrial Waste.		

Summary of Review

Act 14 - Proof of Notification was submitted and received.

This facility is not subject to any ELGs.

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

The applicant should be able to continue 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 or Revocation for Changes to BAT or BCT

SPECIAL CONDITIONS:

II. Requirements Applicable to Stormwater Outfalls

III. Groundwater Cleanup - Granular Activated Carbon (GAC) Adsorption of Organic Pollutants

There are no open violations in efacts associated with the subject Client ID (307309) as of 3/19/2021.

Approve	Deny	Signatures	Date
X		Stephen A. McCauley Stephen A. McCauley, E.I.T. / Environmental Engineering Specialist	3/19/2021
X		Justin C. Dickey Justin C. Dickey, P.E. / Environmental Engineer Manager	3/22/2021

Discharge, Receiving Waters and Water Supply Information

Outfall No.	001	Design Flow (MGD)	0.036
Latitude	40º 37' 44.0"	Longitude	-79º 35' 8.0"
Quad Name	-	Quad Code	-
Wastewater Description:	Groundwater Cleanup Discharge		
Receiving Waters	Kiskiminetas River (WWF)	Stream Code	42816
NHD Com ID	125290358	RMI	7.86
Drainage Area	1560	Yield (cfs/mi^2)	0.13
Q_{7-10} Flow (cfs)	249	Q_{7-10} Basis	USGS StreamStats
Elevation (ft)	820	Slope (ft/ft)	0.00161
Watershed No.	18-B	Chapter 93 Class.	WWF
Existing Use	-	Existing Use Qualifier	-
Exceptions to Use	-	Exceptions to Criteria	-
Assessment Status	Impaired*		
Cause(s) of Impairment	Metals, Total Suspended Solids (TSS)		
Source(s) of Impairment	Acid Mine Drainage		
TMDL Status	Final, 1/29/2010	Name	Kiskiminetas-Conemaugh River Watersheds TMDL

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

Nearest Downstream Public Water Supply Intake	Buffalo Township Municipal Water Authority - Freeport		
PWS Waters	Allegheny River	Flow at Intake (cfs)	2576
PWS RMI	30.0	Distance from Outfall (mi)	8.5

* - The metals impairment was addressed previously, with the result being monitoring for Total Manganese which will be retained. The Total Suspended Solids (TSS) impairment is not an issue as the groundwater is treated using Granular Activated Carbon (GAC) which removes the majority of solids prior to discharge.

The stormwater at Outfall 001 continues to be covered under a No Exposure Certification.

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.

Narrative: This Fact Sheet details the determination of draft NPDES permit limits for an existing discharge of 0.036 MGD of treated groundwater, and stormwater in Parks Township, Armstrong County.

Existing treatment permitted under WQM 0306201 consists of: A collection manhole, a 20 gpm self-priming pump, and two liquid phase activated carbon vessels containing Granular Activated Carbon (GAC) for carbon adsorption.

Streamflow: Kiskiminetas River (USGS Gage 03048500) @ Outfall 001:

Q_{7-10}:	249	cfs	USGS StreamStats
Drainage Area:	1860	sq. mi.	USGS StreamStats
% of stream allocated:	100%	Basis:	No nearby discharges
Yieldrate:	0.13	cfsm	calculated

2. Wasteflow: Outfall 001

Maximum discharge: 0.036 MGD = 0.055 cfs

Runoff flow period: 24 hours Basis: Continuous groundwater treatment

The calculated stream flow is more than 3 parts to the discharge flow. Therefore, in accordance with the SOP, no treatment requirements will be required from document number 391-2000-014, titled, “Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers”, dated April 12, 2008.

Flow will continue to be monitored as authorized under Chapter 92a.61, and as recommended in the SOP.

3. Parameters evaluated:

a. pH

Between 6.0 and 9.0 at all times

Basis: Application of Chapter 95.2 technology-based limits.

b. Total Suspended Solids (TSS)

No TSS limits are necessary with this renewal.

Basis: Since Granular Activated Carbon (GAC) is used, the majority of solids are removed prior to discharge.

4. Reasonable Potential Analysis:

A Reasonable Potential Analysis was performed in accordance with State practices for Outfall 001 through the use of the Department’s Toxics Management Spreadsheet (see Attachment 1). Based on the spreadsheet, none of the parameters sampled in the renewal application will be required to be monitored or will be given limits.

Result: No WQBELs are necessary for this renewal.

However, due to the existing groundwater contamination, the previous monitoring for Total Manganese and cis-1,2-Dichloroethylene will be retained with this renewal. The previous concentration limits for Trichloroethylene will also be retained with this renewal as the limits are attainable.

5. NO_2-NO_3, Fluoride, Phenolics, Sulfates, Chlorides, and TDS:

Nearest Downstream potable water supply (PWS): Buffalo Township Municipal Water Authority - Freeport

Distance downstream from the point of discharge: 8.5 miles (approximate)

☒ No limits necessary
☐ Limits needed

Basis: Significant dilution is available. While none of the PWS parameters were sampled in the renewal application, the ratio of the downstream PWS flow to the discharge flow is greater than 4500:1.

6. Anti-Backsliding

Since all the permit limits in this renewal are the same or more restrictive than the previous NPDES Permit, anti-backsliding is not applicable.

7. Attachment List:

Attachment 1 - Toxics Management Spreadsheet

(The Attachments above can be found at the end of this document)

Compliance History

DMR Data for Outfall 001 (from February 1, 2020 to January 31, 2021)

Parameter	JAN-21	DEC-20	NOV-20	OCT-20	SEP-20	AUG-20	JUL-20	JUN-20	MAY-20	APR-20	MAR-20	FEB-20
Flow (MGD) Average Monthly	0.0072	0.0067	0.0059	0.0064	0.0063	0.0068	0.0069	0.0076	0.0089	0.0097	0.0099	0.010
Flow (MGD) Daily Maximum	0.010	0.010	0.0095	0.012	0.0096	0.0093	0.0080	0.0098	0.011	0.014	0.015	0.014
pH (S.U.) Minimum	6.5	6.2	6.3	6.1	6.12	6.24	6.39	6.46	5.9	6.1	6.0	6.35
pH (S.U.) Maximum	6.2	6.3	6.0	6.0	6.12	6.0	6.15	6.46	5.9	6.1	6.0	6.14
Total Manganese (mg/L) Instantaneous Maximum		< 0.0040			0.0045			0.0040			0.0096	
cis-1,2-Dichloroethylene (mg/L) Average Monthly	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001	< 0.001
cis-1,2-Dichloroethylene (mg/L) Instantaneous Maximum	< 0.00025	< 0.00025	< 0.00025	< 0.00025	0.00037	< 0.00025	< 0.00025	< 0.00025	< 0.00025	< 0.00025	< 0.00025	< 0.00025
Trichloroethylene (mg/L) Average Monthly	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Trichloroethylene (mg/L) Instantaneous Maximum	< 0.012	< 0.012	< 0.012	< 0.012	< 0.012	< 0.012	< 0.012	< 0.012	< 0.012	< 0.012	< 0.012	< 0.012

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) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Average Monthly	Average Monthly	Maximum	Instant. Maximum		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	2/month	Measured
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	2/month	Grab
Total Manganese	XXX	XXX	XXX	XXX	XXX	Report	1/quarter	Grab
cis-1,2-Dichloroethylene	XXX	XXX	Report	XXX	XXX	Report	2/month	Grab
Trichloroethylene	XXX	XXX	XXX	0.005	XXX	0.012	2/month	Grab

Compliance Sampling Location: Outfall 001, prior to mixing with any other waters.

Flow, Total Manganese, and cis-1,2-Dichloroethylene are monitor only based on Chapter 92a.61. The limits for pH are technology-based on Chapter 95.2. The limits for Trichloroethylene (TCE) are water quality-based on the US EPA MCL for drinking water.

Attachment 1

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Toxics Management Spreadsheet
Version 1.2, February 2021

Discharge Information

Instructions | Discharge | Stream

Facility: **Cook Vandergrift** NPDES Permit No.: **PA0253006** Outfall No.: **001**

Evaluation Type: **Major Sewage / Industrial Waste** Wastewater Description: **Groundwater Cleanup**

Discharge Characteristics								
Design Flow (MGD)*	Hardness (mg/l)*	pH (SU)*	Partial Mix Factors (PMFs)				Complete Mix Times (min)	
			AFC	CFC	THH	CRL	Q_{7-10}	Q_h
0.036	100	6.4						

					0 if left blank		0.5 if left blank		0 if left blank			1 if left blank	
	Discharge Pollutant	Units	Max Discharge Conc		Trib Conc	Stream Conc	Daily CV	Hourly CV	Stream CV	Fate Coeff	FOS	Criteria Mod	Chem Transl
Group 1	Total Dissolved Solids (PWS)	mg/L											
	Chloride (PWS)	mg/L											
	Bromide	mg/L											
	Sulfate (PWS)	mg/L											
	Fluoride (PWS)	mg/L											
Group 2	Total Aluminum	µg/L											
	Total Antimony	µg/L											
	Total Arsenic	µg/L											
	Total Barium	µg/L											
	Total Beryllium	µg/L											
	Total Boron	µg/L											
	Total Cadmium	µg/L											
	Total Chromium (III)	µg/L											
	Hexavalent Chromium	µg/L											
	Total Cobalt	µg/L											
	Total Copper	µg/L											
	Free Cyanide	µg/L											
	Total Cyanide	µg/L											
	Dissolved Iron	µg/L											
	Total Iron	µg/L											
	Total Lead	µg/L											
	Total Manganese	µg/L		9.6		0							
	Total Mercury	µg/L											
	Total Nickel	µg/L											
	Total Phenols (Phenolics) (PWS)	µg/L											
	Total Selenium	µg/L											
	Total Silver	µg/L											
	Total Thallium	µg/L											
	Total Zinc	µg/L											
	Total Molybdenum	µg/L											
	Acrolein	µg/L	<										
	Acrylamide	µg/L	<										
	Acrylonitrile	µg/L	<										
	Benzene	µg/L	<										
	Bromoform	µg/L	<										
	Carbon Tetrachloride	µg/L	<										

Group 3	Chlorobenzene	µg/L											
	Chlorodibromomethane	µg/L	<										
	Chloroethane	µg/L	<										
	2-Chloroethyl Vinyl Ether	µg/L	<										
	Chloroform	µg/L	<										
	Dichlorobromomethane	µg/L	<										
	1,1-Dichloroethane	µg/L	<										
	1,2-Dichloroethane	µg/L	<										
	1,1-Dichloroethylene	µg/L	<										
	1,2-Dichloropropane	µg/L	<										
	1,3-Dichloropropylene	µg/L	<										
	1,4-Dioxane	µg/L	<										
	Ethylbenzene	µg/L	<										
	Methyl Bromide	µg/L	<										
	Methyl Chloride	µg/L	<										
	Methylene Chloride	µg/L	<										
	1,1,2,2-Tetrachloroethane	µg/L	<										
	Tetrachloroethylene	µg/L	<										
	Toluene	µg/L	<										
	1,2-trans-Dichloroethylene	µg/L	<										
	1,1,1-Trichloroethane	µg/L	<										
	1,1,2-Trichloroethane	µg/L	<										
	Trichloroethylene	µg/L	<	12		0							
	Vinyl Chloride	µg/L	<										
Group 4	2-Chlorophenol	µg/L	<										
	2,4-Dichlorophenol	µg/L	<										
	2,4-Dimethylphenol	µg/L	<										
	4,6-Dinitro-o-Cresol	µg/L	<										
	2,4-Dinitrophenol	µg/L	<										
	2-Nitrophenol	µg/L	<										
	4-Nitrophenol	µg/L	<										
	p-Chloro-m-Cresol	µg/L	<										
	Pentachlorophenol	µg/L	<										
	Phenol	µg/L	<										
	2,4,6-Trichlorophenol	µg/L	<										
Group 5	Acenaphthene	µg/L	<										
	Acenaphthylene	µg/L	<										
	Anthracene	µg/L	<										
	Benzidine	µg/L	<										
	Benzo(a)Anthracene	µg/L	<										
	Benzo(a)Pyrene	µg/L	<										
	3,4-Benzofluoranthene	µg/L	<										
	Benzo(ghi)Perylene	µg/L	<										
	Benzo(k)Fluoranthene	µg/L	<										
	Bis(2-Chloroethoxy)Methane	µg/L	<										
	Bis(2-Chloroethyl)Ether	µg/L	<										
	Bis(2-Chloroisopropyl)Ether	µg/L	<										
	Bis(2-Ethylhexyl)Phthalate	µg/L	<										
	4-Bromophenyl Phenyl Ether	µg/L	<										
	Butyl Benzyl Phthalate	µg/L	<										
	2-Chloronaphthalene	µg/L	<										
	4-Chlorophenyl Phenyl Ether	µg/L	<										
	Chrysene	µg/L	<										
	Dibenzo(a,h)Anthrancene	µg/L	<										
	1,2-Dichlorobenzene	µg/L	<										
	1,3-Dichlorobenzene	µg/L	<										
	1,4-Dichlorobenzene	µg/L	<										
	3,3-Dichlorobenzidine	µg/L	<										
	Diethyl Phthalate	µg/L	<										
	Dimethyl Phthalate	µg/L	<										
	Di-n-Butyl Phthalate	µg/L	<										
	2,4-Dinitrotoluene	µg/L	<										
	2,6-Dinitrotoluene	µg/L	<										

	Di-n-Octyl Phthalate	µg/L	<										
	1,2-Diphenylhydrazine	µg/L	<										
	Fluoranthene	µg/L	<										
	Fluorene	µg/L	<										
	Hexachlorobenzene	µg/L	<										
	Hexachlorobutadiene	µg/L	<										
	Hexachlorocyclopentadiene	µg/L	<										
	Hexachloroethane	µg/L	<										
	Indeno(1,2,3-cd)Pyrene	µg/L	<										
	Isophorone	µg/L	<										
	Naphthalene	µg/L	<										
	Nitrobenzene	µg/L	<										
	n-Nitrosodimethylamine	µg/L	<										
	n-Nitrosodi-n-Propylamine	µg/L	<										
	n-Nitrosodiphenylamine	µg/L	<										
	Phenanthrene	µg/L	<										
	Pyrene	µg/L	<										
	1,2,4-Trichlorobenzene	µg/L	<										
Group 6	Aldrin	µg/L	<										
	alpha-BHC	µg/L	<										
	beta-BHC	µg/L	<										
	gamma-BHC	µg/L	<										
	delta BHC	µg/L	<										
	Chlordane	µg/L	<										
	4,4-DDT	µg/L	<										
	4,4-DDE	µg/L	<										
	4,4-DDD	µg/L	<										
	Dieldrin	µg/L	<										
	alpha-Endosulfan	µg/L	<										
	beta-Endosulfan	µg/L	<										
	Endosulfan Sulfate	µg/L	<										
	Endrin	µg/L	<										
	Endrin Aldehyde	µg/L	<										
	Heptachlor	µg/L	<										
	Heptachlor Epoxide	µg/L	<										
	PCB-1016	µg/L	<										
	PCB-1221	µg/L	<										
	PCB-1232	µg/L	<										
	PCB-1242	µg/L	<										
	PCB-1248	µg/L	<										
	PCB-1254	µg/L	<										
	PCB-1260	µg/L	<										
	PCBs, Total	µg/L	<										
	Toxaphene	µg/L	<										
	2,3,7,8-TCDD	ng/L	<										
Group 7	Gross Alpha	pCi/L											
	Total Beta	pCi/L	<										
	Radium 226/228	pCi/L	<										
	Total Strontium	µg/L	<										
	Total Uranium	µg/L	<										
	Osmotic Pressure	mOs/kg											

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Toxics Management Spreadsheet
Version 1.2, February 2021

Stream / Surface Water Information

Cook Vandergrift, NPDES Permit No. PA0253006, Outfall 001

Instructions | Discharge | *Stream*

Receiving Surface Water Name: Kiskiminetas River

No. Reaches to Model: 1

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

Location	Stream Code*	RMI*	Elevation (ft)*	DA (mi^2)*	Slope (ft/ft)	PWS Withdrawal (MGD)	Apply Fish Criteria*
Point of Discharge	042816	7.86	820	1560			Yes
End of Reach 1	042816	5.52	800	1570			Yes

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

Location	RMI	LFY (cfs/mi^2)*	Flow (cfs)		W/D Ratio	Width (ft)	Depth (ft)	Velocity (fps)	Travel Time (days)	Tributary		Stream		Analysis	
			Stream	Tributary						Hardness	pH	Hardness*	pH*	Hardness	pH
Point of Discharge	7.86	0.13										100	7		
End of Reach 1	5.52	0.13													

Q_h

Location	RMI	LFY (cfs/mi^2)	Flow (cfs)		W/D Ratio	Width (ft)	Depth (ft)	Velocity (fps)	Travel Time (days)	Tributary		Stream		Analysis	
			Stream	Tributary						Hardness	pH	Hardness	pH	Hardness	pH
Point of Discharge	7.86														
End of Reach 1	5.52														

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Toxics Management Spreadsheet
Version 1.2, February 2021

Model Results

Cook Vandergrift, NPDES Permit No. PA0253006, Outfall 001

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

☑ ***Hydrodynamics***

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

RMI	Stream Flow (cfs)	PWS Withdrawal (cfs)	Net Stream Flow (cfs)	Discharge Analysis Flow (cfs)	Slope (ft/ft)	Depth (ft)	Width (ft)	W/D Ratio	Velocity (fps)	Travel Time (days)	Complete Mix Time (min)
7.86	202.80		202.80	0.056	0.002	1.156	239.354	207.092	0.733	0.195	1569.874
5.52	204.10		204.1								

Q_h

RMI	Stream Flow (cfs)	PWS Withdrawal (cfs)	Net Stream Flow (cfs)	Discharge Analysis Flow (cfs)	Slope (ft/ft)	Depth (ft)	Width (ft)	W/D Ratio	Velocity (fps)	Travel Time (days)	Complete Mix Time (min)
7.86	771.55		771.55	0.056	0.002	2.081	239.354	115.046	1.549	0.092	650.282
5.52	775.875		775.87								

☑ ***Wasteload Allocations***

☑ ***AFC*** CCT (min): 15 PMF: 0.098 Analysis Hardness (mg/l): 100 Analysis pH: 7.00

Pollutants	Stream Conc (µg/L)	Stream CV	Trib Conc (µg/L)	Fate Coef	WQC (µg/L)	WQ Obj (µg/L)	WLA (µg/L)	Comments
Total Manganese	0	0		0	N/A	N/A	N/A	
Trichloroethylene	0	0		0	2,300	2,300	820,984	

☑ ***CFC*** CCT (min): 720 PMF: 0.677 Analysis Hardness (mg/l): 100 Analysis pH: 7.00

Pollutants	Stream Conc (µg/L)	Stream CV	Trib Conc (µg/L)	Fate Coef	WQC (µg/L)	WQ Obj (µg/L)	WLA (µg/L)	Comments
Total Manganese	0	0		0	N/A	N/A	N/A	
Trichloroethylene	0	0		0	450	450	1,110,191	

☑ ***THH*** CCT (min): 720 PMF: 0.677 Analysis Hardness (mg/l): N/A Analysis pH: N/A

Pollutants	Stream Conc	Stream	Trib Conc	Fate	WQC	WQ Obj	WLA (µg/L)	Comments

Pollutants	Conc (µg/L)	CV	(µg/L)	Coef	(µg/L)	(µg/L)	WLA (µg/L)	Comments
Total Manganese	0	0		0	1,000	1,000	2,467,090	
Trichloroethylene	0	0		0	N/A	N/A	N/A	

☑ ***CRL*** CCT (min): ###### PMF: 1 Analysis Hardness (mg/l): N/A Analysis pH: N/A

Pollutants	Stream Conc (µg/L)	Stream CV	Trib Conc (µg/L)	Fate Coef	WQC (µg/L)	WQ Obj (µg/L)	WLA (µg/L)	Comments
Total Manganese	0	0		0	N/A	N/A	N/A	
Trichloroethylene	0	0		0	2.5	2.5	34,637	

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

No. Samples/Month: 4

Pollutants	*Mass Limits*		*Concentration Limits*				Governing WQBEL	WQBEL Basis	Comments
	AML (lbs/day)	MDL (lbs/day)	AML	MDL	IMAX	Units			

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

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

Pollutants	Governing WQBEL	Units	Comments
Total Manganese	2,467,090	µg/L	Discharge Conc ≤ 10% WQBEL
Trichloroethylene	34,637	µg/L	Discharge Conc ≤ 25% WQBEL