pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Northwest Regional Office
CLEAN WATER PROGRAM

Application Type	**New**	Application No.	**PA0288713**
Facility Type	**Storm Water**	APS ID	**1023092**
Major / Minor	**Minor**	Authorization ID	**1326711**

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

Applicant and Facility Information

Applicant Name	**Metaldyne Sinterforge Products, LLC**	Facility Name	**AAM St Marys**
Applicant Address	197 W Creek Road Saint Marys, PA 15857	Facility Address	197 West Creek Road Saint Marys, PA 15857-3339
Applicant Contact	Adam Wehler	Facility Contact	Adam Wehler
Applicant Phone	(814) 834-8153	Facility Phone	(814) 834-8153
Client ID	254213	Site ID	456974
SIC Code	3499	Municipality	Saint Marys City
SIC Description	Manufacturing - Fabricated Metal Products, Nec	County	Elk
Date Application Received	May 22, 2020	EPA Waived?	Yes
Date Application Accepted	September 15, 2020	If No, Reason	

Purpose of Application: An Individual NPDES Permit for an existing discharge of stormwater for industrial activities.

Summary of Review

This facility is a Powder Metallurgy Part Manufacturer, SIC Code 3499.

This permit does not qualify for a general PAG-03 permit because it discharges to West Creek, which has an HQ-CWF, MF stream designation.

There are no open violations for subject client no. 254213 as of April 14, 2021.

Public Participation

DEP will publish notice of the receipt of the NPDES permit application and a tentative decision to issue the individual NPDES permit in the *Pennsylvania Bulletin* in accordance with 25 Pa. Code § 92a.82. Upon publication in the *Pennsylvania Bulletin*, DEP will accept written comments from interested persons for a 30-day period (which may be extended for one additional 15-day period at DEP's discretion), which will be considered in making a final decision on the application. Any person may request or petition for a public hearing with respect to the application. A public hearing may be held if DEP determines that there is significant public interest in holding a hearing. If a hearing is held, notice of the hearing will be published in the *Pennsylvania Bulletin* at least 30 days prior to the hearing and in at least one newspaper of general circulation within the geographical area of the discharge.

Approve	Deny	Signatures	Date
X		Jon F. Bucha Jonathan F. Bucha / Civil Engineer Trainee	April 13, 2021
X		Justin C. Dickey Justin C. Dickey, P.E. / Environmental Engineer Manager	April 23, 2021

Discharge, Receiving Waters and Water Supply Information

Outfall No.	001	Design Flow (MGD)	0
Latitude	41º 27' 12"	Longitude	-78º 32' 42"
Quad Name	Saint Marys	Quad Code	0717
Wastewater Description:	Stormwater		
Receiving Waters	Unnamed Tributary to West Creek (HQ-CWF, MF)	Stream Code	25332
NHD Com ID	61429612	RMI	0.3
Drainage Area	-	Yield (cfs/mi^2)	-
Q_{7-10} Flow (cfs)	-	Q_{7-10} Basis	-
Elevation (ft)	1627	Slope (ft/ft)	-
Watershed No.	8-A	Chapter 93 Class.	HQ-CWF, MF
Existing Use	-	Existing Use Qualifier	-
Exceptions to Use	-	Exceptions to Criteria	-
Assessment Status	Attaining Use(s)		
Cause(s) of Impairment	Metals and pH (low)		
Source(s) of Impairment	Acid Mine Drainage		
TMDL Status	Final	Name	West Creek

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

Nearest Downstream Public Water Supply Intake	-		
PWS Waters	-	Flow at Intake (cfs)	-
PWS RMI	-	Distance from Outfall (mi)	-

Changes Since Last Permit Issuance: This facility was previously covered by a No Exposure certification that expired on June 8, 2016. Because West Creek has a High Quality stream designation, an Individual Industrial Stormwater permit is now required to ensure the stream is being protected.

Other Comments: This section of West Creek has a Final TMDL due to Acid Mine Drainage for Metals, pH, Aluminum, Iron, Manganese, and Low pH. This facility does not have an assigned waste load allocation.

Compliance History	
Summary of DMRs:	Stormwater sampling results provided on the Individual NPDES Industrial Stormwater application were within benchmark stormwater values except COD was 39 mg/L, and BOD_5 did not use a low enough QL.
Summary of Inspections:	N/A

Development of Effluent Limitations

Outfall No.	001	**Design Flow (MGD)**	0
Latitude	41º 27' 12"	**Longitude**	-78º 32' 42"
Wastewater Description:	Stormwater		

Best Professional Judgment (BPJ) Limitations

Comments: Monitoring for parameters listed in Module 1 of the NPDES Industrial Waste Permit Application will be incorporated into the permit to demonstrate compliance with the "non-degrading discharge" condition of 25 Pa. Code Chapter 93.4a. A continual assurance of this will be done through the establishment of 1/year monitoring in place of once every 5 years monitoring required on the No Exposure Certification. A monitoring requirement for Total Aluminum, Total Iron, and Total Manganese is being implemented in order to collect data since the discharge is to a watercourse with a Final TMDL, but with no waste load allocations assigned to the facility.

Anti-Backsliding

Anti-backsliding does not apply.

Antidegradation Evaluation

This facility was previously covered by a No Exposure certification that expired on June 8, 2016. Because West Creek has a High Quality (HQ) stream designation, an Individual Industrial Stormwater permit is now required to ensure the stream is being protected. However, anti-degradation procedures were followed since this permit involves a "new" discharge to a High Quality (HQ) designated stream (considered "new" because it was not in existence and/or has been expanded since the stream was designated as High Quality).

The Department has determined that the permittee is demonstrating the "non-degrading discharge" condition of 25 Pa. Code Chapter 93.4a will be achieved because the site meets "no exposure" conditions. In general, DEP considers industrial stormwater discharges that are controlled by post-construction stormwater management BMPs implemented under 25 Pa. Code Chapter 102 and "no exposure" conditions to be non-degrading. For existing stormwater discharges to HQ/EV waters seeking permit coverage for the first time such as this facility, DEP may also consider existing stormwater quality data. The site does have stormwater controls that are existing and have been in-place for many years (see attached Google Earth aerial imagery showing minimal difference in site conditions between 1985 and present. The condition of "no exposure" appears to be met at this facility and the site has historically been covered under a "no exposure" certification. Although the permit application showed an exceedance of the benchmark value for COD and BOD5 was not reported at a low enough QL, these values are "benchmarks" only and there is no reason from the site conditions to believe that the industrial activity is contributing to the exceedances. However, effluent quality of the "no exposure" benchmark value parameters will be monitored as a condition of the permit at a frequency of 1/year for further evaluation in future permit renewals. This will provide the Department with at least 5 effluent samples compared to the one required by the application.

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	Minimum	Annual Average	Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab
Biochemical Oxygen Demand (BOD_5)	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab
Chemical Oxygen Demand (COD)	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab
Total Suspended Solids (TSS)	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab
Oil and Grease	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab
Total Nitrogen	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab
Total Phosphorus	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab
Total Aluminum	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab
Total Iron	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab
Total Manganese	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab

Compliance Sampling Location: Outfall 001 (before mixing with other waters).

Google Earth Aerial Imagery (2017 – most current)

Google Earth Aerial Imagery (1985)