

Application Type Renewal
Facility Type Storm Water
Major / Minor Minor

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

Application No. PAS802226
APS ID 779555
Authorization ID 1102028

Applicant and Facility Information

Applicant Name	<u>Wyman Gordon PA LLC</u>	Facility Name	<u>Wyman Gordon PA LLC</u>
Applicant Address	<u>PO Box 68 701 Crestwood Drive Mountain Top, PA 18707-0068</u>	Facility Address	<u>701 Crestwood Drive Mountain Top, PA 18707-2143</u>
Applicant Contact	<u>William Round</u>	Facility Contact	<u>William Round</u>
Applicant Phone	<u>(570) 474-6371</u>	Facility Phone	<u>(570) 474-6371</u>
Client ID	<u>294855</u>	Site ID	<u>258210</u>
SIC Code	<u>3724</u>	Municipality	<u>Wright Township</u>
SIC Description	<u>Manufacturing - Aircraft Engines And Engine Parts</u>	County	<u>Luzerne</u>
Date Application Received	<u>December 21, 2015</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>December 23, 2015</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>Renewal of Individual IW Stormwater NPDES Permit</u>		

Summary of Review

This is a renewal of an Individual IW Stormwater NPDES Permit for discharge upstream of the High Quality segment of Bow Creek (i.e. potential for negative impact on downstream HQ watershed).

Background: This ~13.5 acres facility includes one primary building and an outdoor storage barn. The facility does cold forming of super alloy rings for the aerospace industry. Activities include: forming, welding, sizing, machining, expanding, processing, and milling. Outside storage areas for: Scrap metal; metal turning chip bins, in-process products, and dumpsters for scrap metals, cardboard, and rubbish. Facility has a post-construction stormwater management (PCSM) retention pond.

General History:

- **2006 PAG-03 NOI:** The facility does "cold forming of Super Alloys (Ni, Co, Cr, Ti) rings" used in gas turbine engines per 2006 PAG-03 NOI. Three stormwater outfalls (001, 002, 003) identified. Barium (0.06 mg/l), Zinc (0.12 mg/l), Nickel (0.06 mg/l) detected at lab QLs.
 - Outfall 001: Northern side of building (152,583 square feet, pave/roof)
 - Outfall 002: Northern side of building (381,437 square feet, grass)
 - Outfall 003: Western side of property (57,525 square feet, grass)
- **3/19/2008:** PAG-03 Transfer to Unison Engine Components.
- **7/10/2010:** Unison Engine Components Letter (previous operator) indicated that the Department informed them that the receiving stream was reclassified as HQ, requiring an Individual IW NPDES Permit to replace the 1/26/2006 GP NPDES ID# PAR202246 (PAG-03) for Smith Aerospace Components. The GP classified the facility as under PAG-03 Appendix B (Primary Metals Industry). DMRs to 2010 in Unison Engine PAG-03 DMR file. SIC Code was corrected to SIC Code# 3724. PAG-03 Appendix A monitoring requirements referenced in Fact Sheet for: O&G; TSS, TP, TKN; Nickel; and Chromium.
- **6/1/2011:** Individual IW Stormwater NPDES permit issued to Unison Engine Components, Inc. Only stormwater authorized to discharge in Part A, with Part C allowing for discharge of uncontaminated groundwater;

Approve	Deny	Signatures	Date
X		James D. Berger, P.E. / Environmental Engineer	July 9, 2019
X		Amy M. Bellanca, P.E. / Environmental Engineer Manager	

Summary of Review

foundation/footing drains; where flows are not contaminated; uncontaminated AC condensate. The 2011 NPDES Permit Fact Sheet indicated:

- Reclassification to HQ stream.
- No direct mention of non-stormwater discharge via Outfall No. 001, which was indicated as representative of Outfalls Nos. 003 and 005. Applicant public comments asked that the “authorized non-stormwater discharges” section language be updated, but without identifying what discharges were site-specific
- SIC Code No. 3724 applied with note that metal finishing occurs onsite (but no stormwater ELG).
- GP NPDES Permit No. PAR202246 would terminate upon final permit action.
- Site description noted metals such as Nickel, Cobalt, Chromium, and Titanium. Stormwater Module 12 indicated Outfall No. 001 had groundwater and AC condensate discharges.
- 5/10/2012: PAS802226 A-1 transferred permit to Wyman Gordon PA, LLC. Part A has monitoring requirements for Outfalls Nos. 001, 003, and 005 (TSS, Oil & Grease; TKN; TP; Chromium; Nickel). Outfall #001 was noted to be representative of Outfalls #003 and #005. Outfalls Nos. 002 and 004 did not have Part A monitoring requirements.
- 11/3/2015: NOV noted current permittee not in compliance with DMRs/Additional information form submittals. Applicant responded with letter with eDMR screen shots.
- 2/1/2019: Talked to Mr. Robert Pazzaglia (EHS) about Current NPDES Permit Stormwater Sampling Requirements (Individual IW NPDES Stormwater Permit Application Form) constituents and DEP Target QLs
 - At least one analysis for: Oil & Grease, BOD5, COD, TSS, Total Nitrogen (TKN + Nitrate-Nitrite as N), Total Phosphorus, pH
 - All other constituents from last permit: Total Kjeldahl Nitrogen, Total Chromium, Total Nickel
 - PAG-03 Appendix U: Nitrate-Nitrate as N, Aluminum, Iron, Zinc (closest PAG-03 appendix)
 - ELG: List all pollutants contained within an Effluent Limitation Guideline (ELG) that is applicable to the facility’s industrial activity. For SIC Code No. 3724, 40 CFR 433 (Metal Finishing) Effluent Limitation Guidelines (ELGs) per SIC/ELG Crosswalk (EPA) applies. If doing any of the six listed operations, also sample for the ELG constituents listed. If any of the cross-referenced ELGs apply, do those ELG constituents.
 - Any other Pollutant Group 1 through 7 (Application form appendix) constituent the applicant KNOWS or has reason to BELIEVE is onsite; Cobalt, and any others
 - Outfall No. 001 also discharges air conditioner condensate and groundwater.
 - Uncontaminated condensate from air conditioners, coolers/chillers, and other compressors (if treatment through an oil/water separator is provided) and from the outside storage of refrigerated gases or liquids;
 - Uncontaminated ground water or spring water
 - Told him to include any updated BMPs/PPC plan with the submittal, and pointed out the GP PAG-03 general and sector-specific BMPs as similar to what will be going into the next NPDES Permit.
- 3/4/2019: Discussed application requirements in telephone call with consultant (Jerry Washo of Resource Management): Will expect stormwater data by end of month of March, assuming no deep freeze, and they should submit an up-to-date PPC plan if they have to update it to meet NPDES Permit requirements (including NPDES Permit addendum and current stormwater BMPs).
- 3/7/2019: Consultant called about potential address change for facility. Can be handled by letter if GIF-required information is provided, as long as it is for the same legal entity or Application update (stormwater results).
- 6/17/2019: Revised Application (with stormwater sampling data) received.
- 6/26/2019: Site visit with inspector (partial inspection). Met with Mr. Robert Pazzaglia (EHS Manager), the consultant (Jerry Washo) and others. Gave Mr. Pazzaglia an excerpt from IW Stormwater NPDES Permit template Part C conditions for informational purposes. Talked in office and then went out to see Outfalls and Outfall drainage areas while there.
 - Facility is not discharging groundwater per Mr. Pazzaglia’s assurances. They did not know why it was mentioned in the NPDES Permit Application (changes in personnel since then). Previous NPDES Permit authorized discharge of uncontaminated groundwater only, with recent Environmental Covenant prohibiting any groundwater extraction or usage. They have been closing the last monitoring wells onsite.
 - Facility is not discharging AC condensate. It is being captured and directed into wastewater system tank for offsite disposal.
 - Facility is not aware of any “inside” building discharges to the outside.
 - Outfall Areas:
 - Outfall No. 001:
 - They may modify outfall location for additional spill control option and better access. Recommended they send in a notification when they do it, for the record.

Summary of Review

- Upslope retention pond was water-filled and covered by algae. Mr. Pazzaglia had never seen it either overflow (pipe under plant to Outfall No. 001) or empty in the year or so he has been onsite. Noted general pond concerns include use of algicides and mosquito control.
- Outfall No. 003: There are storage containers in that drainage area.
- Outfall No. 005: They have been removing outdoor stored equipment from area, and plan to remove more.
- Draft NPDES Permit: Told them it would be forthcoming, and explained public comment period. They expressed a desire for limited stormwater sampling requirements.

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.

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	001, 002, 003, 004, 005	Design Flow (MGD)	0 (stormwater only)
	41° 8' 45.50" (001)		-75° 53' 8.28" (001)
	41° 8' 45.70" (002)		-75° 53' 9.96" (002)
	41° 8' 45.57" (003)		-75° 53' 8.83" (003)
	41° 8' 45.70" (004)		-75° 53' 9.96" (004)
Latitude	41° 8' 45.56" (005)	Longitude	-75° 53' 7.29" (005)
Quad Name	Wilkes-Barre West	Quad Code	0938 (4.29.4)
Wastewater Description:	Stormwater associated with industrial activities (001, 003, and 005) Other stormwater (002 and 004)		
Receiving Waters	Bow Creek	Stream Code	28250
NHD Com ID	65635625	RMI	-
Drainage Area	-	Yield (cfs/mi ²)	-
Q ₇₋₁₀ Flow (cfs)	-	Q ₇₋₁₀ Basis	-
Elevation (ft)	1680 Feet	Slope (ft/ft)	-
Watershed No.	5-B	Chapter 93 Class.	CWF
Existing Use	-	Existing Use Qualifier	-
Exceptions to Use	-	Exceptions to Criteria	-
Assessment Status	Attaining Use(s)		
Cause(s) of Impairment	-		
Source(s) of Impairment	-		
TMDL Status	-	Name	-
Background/Ambient Data: None available	Data Source: None available		
pH (SU)	-		-
Temperature (°F)	-		-
Hardness (mg/L)	-		-
Other:	-		-
Nearest Downstream Public Water Supply Intake	Danville		
PWS Waters	Susquehanna River	Flow at Intake (cfs)	-
PWS RMI	-	Distance from Outfall (mi)	50 miles

Changes Since Last Permit Issuance: Bow Creek has been designated a Natural Trout Reproduction stream. Stormwater is not expected to impact the Natural Trout Reproduction Stream non-summer Dissolved Oxygen (DO) WQS.

Other Comments:

- Bow Creek is designated High Quality downstream (starting at SR 309 bridge). Fairview Township has a MS4 NPDES Permit No. PA1132261 outfall that discharges on other side of Bow Creek to the non-HQ reach.
- Stormwater runoff flow route of to Bow Creek is unclear. E-maps and USGS PASTreamstats indicate perennial stream reaches are at a distance from the facility. There appeared to be a wet drainage channel along the side of the facility during the June 26, 2019 site visit. Facility personnel indicated the channel had drainage upslope of the onsite water retention pond (overflow piped under plant to Outfall No. 001) but 2019 has been a high precipitation year.

Outfall	Drainage Area	Description
001	88,300 Square feet (80% impervious)	Raw material storage, material/equipment storage, drum storage areas, loading & unloading areas, roof drains. BMPs include weekly inspections, good housekeeping, maintenance, spill prevention and training. Outside storage is kept to minimum with outside materials/drums kept free of residual oils and other chemicals.
002	3,000 Square Feet (0% impervious, no exposure claimed)	No industrial activity, stormwater runoff from plant grassy area and run-on from Crestwood Drive.
003	12,300 Square Feet (60% impervious, no exposure claimed)	Driveways and area around dumpsters. The facility thinks Outfall No. 001 should be representative of this area. BMPs include weekly inspections, good housekeeping, maintenance, spill prevention and training. Outside storage* is kept to minimum with outside materials/drums kept free of residual oils and other chemicals.
004	67,000 Square Feet (60% impervious)	No industrial activity, drainage from grassy areas, parking, roof drains from administrative offices, and transformers ("clean industrial equipment with no potential to transport pollutants").
005	98,600 Square Feet (20% impervious)	Transformers, chillers, roof drains, and small outside storage area*, plus stormwater drainage from retention pond, grassy/vegetated areas, and stormwater runoff from south of property. The facility thinks Outfall No. 001 should be representative of this area. BMPs include weekly inspections, good housekeeping, maintenance, spill prevention and training. Outside storage is kept to minimum with outside materials/drums kept free of residual oils and other chemicals. <u>NOTE:</u> The 2014 PPC Plan Site Plan figure shows that the upslope retention pond has an emergency overflow discharge and natural earthen channel discharge upstream of Outfall No. 005 and other overflow channel to Outfall No. 004.

*Outside storage areas are for: Raw materials, finished products, scrap metal, metal turning chip bins, in-process products, and dumpsters for scrap metal, cardboard, and rubbish per PPC Plan. With exception of storage, all activities occur within buildings or under cover per PPC Plan. The facility is a Conditionally-Exempt small quantity generators of hazardous wastes (used aerosol cans, etc.) that are contained in drums prior to shipment offsite (no HW storage area onsite).

Compliance History

DMR Data for Outfall 001 (from November 1, 2017 to October 31, 2018)

Parameter	OCT-18	SEP-18	AUG-18	JUL-18	JUN-18	MAY-18	APR-18	MAR-18	FEB-18	JAN-18	DEC-17	NOV-17
TSS (mg/L) Daily Maximum					< 2.75						< 2.50	
Oil and Grease (mg/L) Daily Maximum					< 5.21						< 5.26	
TKN (mg/L) Daily Maximum					< 1.00						< 1	
Total Phosphorus (mg/L) Daily Maximum					< 0.05						0.743	
Total Chromium (mg/L) Daily Maximum					< 0.025						0.0021	
Total Nickel (mg/L) Daily Maximum					0.0612						0.0205	

Compliance History

- Inspection History: Partial inspections on 1/23/2019 and 6/26/2019.
- This was a timely renewal application.
- No open violations per 6/27/2019 WMS Query (open violations by client):

Permit: PAS802226
Client ID: 294855
Client: All

Open Violations: 0

No data was found using the criteria entered. Please revise your choices and try again

Development of Effluent Limitations

Outfall No.	001	Design Flow (MGD)	0 (stormwater only)
	41° 8' 29.80" (001)		-75° 53' 7.40" (001)
	41° 8' 27.70" (002)		-75° 53' 13.80" (002)
	41° 8' 30.60" (003)		-75° 53' 10.60" (003)
	41° 8' 29.40" (004)		-75° 53' 13.30" (004)
Latitude	41° 8' 30.00" (005)	Longitude	-75° 53' 5.90" (005)
001, 003, and 005: Stormwater associated with industrial activities			
Wastewater Description:	002 and 004: Stormwater only – no monitoring or permit limits		

Permit Limits/Monitoring Requirements: Changes bolded

Parameter	Limit (mg/l unless otherwise specified)	SBC	Model/Basis
pH	6.0 – 9.0 SU	Inst. Min - IMAX	New permit limit (not previously monitored) based upon General Permit PAG-03 Statewide BPJ for Metal Fabricators (closest Appendix to site operations). Chapter 95.2 basis for permit limits.
TSS	100.0	IMAX	Existing monitoring requirement converted into permit limit. General Permit PAG-03 Statewide BPJ for Metal Fabricators (closest Appendix to site operations). Limit based on current PAG-03 Benchmark value.
Nitrite-Nitrate as N	Report	IMAX	New monitoring requirement based upon General Permit PAG-03 Statewide BPJ for Metal Fabricators (closest Appendix to site operations).
Total Aluminum	Report	IMAX	New monitoring requirement based upon General Permit PAG-03 Statewide BPJ for Metal Fabricators (closest Appendix to site operations).
Total Iron	Report	IMAX	New monitoring requirement based upon General Permit PAG-03 Statewide BPJ for Metal Fabricators (closest Appendix to site operations).
Total Zinc	Report	IMAX	New monitoring requirement based upon General Permit PAG-03 Statewide BPJ for Metal Fabricators (closest Appendix to site operations).
Total Cobalt	Report	IMAX	New monitoring upon request requirement (Chapter 92a.61)
Total Chromium	Report	IMAX	Existing monitoring requirement retained due to Reasonable Potential analysis. Changed to Monitoring upon request.
Total Nickel	Report	IMAX	Existing monitoring requirement retained due Reasonable potential analysis.
Oil & Grease	Not needed	-	Not a PAG-03 Appendix U (Fabricated Metal Products) constituent of interest. Will no longer require monitoring.

Total Phosphorus	Not needed	-	Not a PAG-03 Appendix U (Fabricated Metal Products) constituent of interest. Will no longer require monitoring.
Total Nitrogen	Not needed	-	Not a PAG-03 Appendix U (Fabricated Metal Products) constituent of interest.
Total Kjeldahl Nitrogen (TKN)	Not needed	-	Not a PAG-03 Appendix U (Fabricated Metal Products) constituent of interest. Will no longer require monitoring.
Other metals	Not needed	-	Not a PAG-03 Appendix U (Fabricated Metal Products) constituent of interest. See Reasonable Potential Analysis and available analytical data indicated no need for additional monitoring for these constituents.

Comments:

- **Monitoring Requirements:**
 - **General:** IMAX permit limits/monitoring and reporting due to grab sampling.
 - **Outfall No. 001:** This is the outfall that was being monitored and assumed to be representative of Outfalls Nos. 003 and 005 in previous permitting.
 - **Outfalls Nos. 003 and 005:** Previous NPDES Permit indicated Outfall No. 001 was considered representative for these outfalls (had previous Part A monitoring requirements otherwise). There was no sampling data to confirm facility belief that Outfall No. 001 is representative. Sampling will be upon request, with an initial request to sample these outfalls during the first sampling event of the NPDES Permit Term to verify representativeness of Outfall No. 001.
 - **Outfalls Nos. 002 and 004:** Previous NPDES Permit identified the outfalls as “permitted to discharge uncontaminated storm water runoff from areas unaffected by any industrial activities” (cross-referencing Part C.I.D.5 “stormwater monitoring is not required for Outfalls 002 and 004 since the discharges consist of only non-contaminated site stormwater”). No Part A sampling will be required in the absence of material handling/industrial activities. The outfalls and drainage areas remain subject to the site-wide PPC Plan plus annual stormwater inspection requirement due to potential releases from traversing vehicles (to confirm no negative impacts).
 - **Upslope Pond/Retention Basin:** This is a PCCM that must be maintained per NPDES Permit Part C requirements (i.e. maintenance and annual inspection requirements pertain to its emergency overflow outfalls). It was algae-covered during the June 26, 2019 visit, and would likely require annual mosquito control (i.e. any algicide or mosquito control chemical usage must be consistent with product directions).
- **Antidegradation:** The High Quality portion of Bow Creek (below the SR 309 bridge) is downstream of the likely surface flow route for stormwater runoff. The new permit limits, monitoring requirements, PPC Plan implementation, and stormwater BMPs will prevent any further degradation of the downstream HQ receiving stream area.

Reasonable Potential Analysis: There is only sampling data available for Outfall No. 001.

- **Facility Groundwater is Contaminated:** The facility is subject to an Environmental Covenant due to previous soil/groundwater contamination restricting property usages and prohibiting usage of site groundwater for any purpose. The Covenant indicated groundwater impacts included: Dissolved nickel and three PAHs: Benzo(a)pyrene, benzo(g,h,i)perylene, and dibenzo(a,h)anthracene. The absence of water supply wells onsite was indicated to mean there was no completed pathways for contact at the Property. Groundwater must be assumed to be contaminated if discharged. Due to assurances of no groundwater discharges, the existing Environmental Covenant Prohibition & Incomplete Pathways, no PAH monitoring will be required.
- **General Industry Constituents of Interest (pH, Total Suspended Solids (TSS), Nitrate-Nitrite as N, Total Aluminum, Total Iron, and Total Zinc):** SIC/ELG Crosswalk indicated 40 CFR 433 (Metal Finishing) applied to industries in this SIC Code. PAG-03 Appendix U (Fabricated Metal Products) constituents have been added in this permit as constituents of interest in the absence of more applicable PAG-03 appendixes. These constituents are considered industrial category indicator chemicals, not representing all potential constituents of concern.
- **Additional Constituents of Interest (Total Cobalt, Total Nickel and Total Chromium):** See summarized available monitoring data (Outfall No. 001 only). Older analytical data predates EPA Sufficiently Sensitive Rule but ballparks potential constituent ranges.
 - **Total Nickel:** Will be monitored for.
 - **Total Chromium and Total Cobalt:** Will be monitored upon request only.

- **Other Metals:** Available analytical data did not indicate need to monitor additional metals. See below for summarized historical analytical data.

Constituent	2012-2015 Application data (mg/l)	8/20/2010 GP NOI Module 13 (9 samples) (mg/l unless pH)	6/29/2005 NOI Single Sample (mg/l)	2018 Samples (mg unless pH)	2019 Sample Data (mg/l unless pH)	Most Stringent WQS from Toxic Screening Sheet default or PAG-03 Benchmark (mg/l unless pH)
BOD5	-	12.8 max; 5.2 average	-	-	<2.0	30.0
pH	-	5.21 SU min and 6.66 SU max	-	-	6.80 SU	6.0 – 9.0 SU (Chapter 95.2)
COD	-	47 max; 23.74 average	-	-	10	120.0
TSS	<5.0 – 12	20 max; 7.88 average	-	<5.00 14.00	<5.0	100.0
Oil & Grease	1.8 - <6.25	ND (no QL given)	-	-	<1.3	30.0
Total Chromium	0.0051 – 0.0129	0.023 max; 0.004 average	<0.05	<0.0200	<0.0013	N/A Total 0.0104 Hexavalent
Total Nickel	0.016 – 0.11	0.241 max; 0.199 average	-	<0.0400 0.0612	<0.010	0.0522
Total Cobalt	-	0.057 max; 0.022 average	<0.05	<0.0200	0.0012	0.019
Total Titanium	-	ND (no QL given)	<0.05	-	-	-
Total Iron	-	0.819 max; 0.406 average	-	0.277	0.15	1.500
Total Aluminum	-	-	-	0.207	0.058	0.750
TKN	0.046 – 1.37	-	-	<1.25 <1.25	- (0.66 TN)	-
Nitrate-Nitrite as N	-	-	-	-	(0.66 TN)	-
Total Phosphorus	0.038 – 0.0528	-	-	0.034	0.047	-
Total Nitrogen	<1.00	-	-	-	0.66	-
Total Lead	-	ND (no QL given)	<0.05	<0.100	<0.0030	0.0032
Total Copper	-	0.047 max; 0.005 average	<0.05	-	<0.0050	0.0093
Total Cadmium	-	ND (no QL given)	<0.01	-	<0.00033	0.000271
Total Arsenic	-	ND (no QL given)	<0.05	-	-	0.010
Total Antimony	-	-	<0.05	-	-	0.0056
Total Barium	-	-	0.06	-	-	2.400
Total Beryllium	-	-	<0.05	-	-	-
Total Mercury	-	-	<0.001	-	-	0.0005
Total Selenium	-	-	<0.05	-	-	0.005

Total Silver	-	-	<0.05	-	<0.0020	0.0038
Total Thallium	-	-	<0.05	-	-	0.00024
Total Zinc	-	-	0.12	0.0226	0.045	0.1198
n-Hexane Extractable	-	-	-	<5.95 <5.21	-	
Copper	-	-	-	<0.0200	-	

Table 1 (Stormwater Outfalls)

Outfall	Area (SF)	Sources and BMPs
001	88,300 (80% impervious per Module 1; 100% impervious per PPC Plan)	<p><u>Sources:</u> Industrial Building and surrounding area including raw material storage area, material/equipment storage, drum storage, loading/unloading area, roof drains. Groundwater discharge (source not identified, no groundwater data to show it is uncontaminated). AC Condensate discharge. PPC Plan Figure showed (A) raw material storage area (3 sided storage structure); (B) Outside material (scrap)/equipment storage; (D) Turning Bulk Storage; (F) Loading/Unloading Areas; (G) Rooftop units; <u>BMPs include:</u> inspections, good housekeeping, maintenance, spill prevention and training. Outside storage is kept to a minimum and materials/drums staged outdoors are kept free of residual oils and other chemicals. Weekly visual inspections of Outfall. Previous GP NOI indicated raw material storage is staged inside a covered, 3-sided structure. Loading and unloading areas are monitored during transfer operations with a spill kit nearby. Rooftops are inspected. <u>Available Sampling Data:</u> See Reasonable Potential Analysis for Outfall No. 001 historical data. See EDMR section for most recent monitoring data.</p>
002	3,000 (0% impervious)	<p><u>Sources:</u> Crestwood Drive including entrance-way, and grassy area discharge. No industrial activity. They believe this is a no exposure area. PPC Plan Figure showed no identified material handling area and potential sampling location. <u>BMPs:</u> None <u>Available Sampling Data:</u> None found</p>
003	12,300 (60% impervious per Module 1; 96% impervious per PPC Plan)	<p><u>Sources:</u> Driveways, area around dumpster (and exterior storage area per PPC Plan). Outfall discharges to riprap lined channel (shared with Outfall No. 001). <u>BMPs include:</u> inspections, good housekeeping, maintenance, spill prevention and training. Outside storage is kept to a minimum and materials/drums staged outdoors are kept free of residual oils and other chemicals. Weekly visual inspections of Outfall. Previous 8/20/2010 GP NOI noted dumpster is inspected quarterly. PPC Plan Figure showed A/C on pad (i.e. potential source of AC condensate) and (E) scrap metal dumpster. <u>Available Sampling Data:</u> None found.</p>
004	67,000 (60% impervious)	<p><u>Sources:</u> Grassy areas, parking area, roof drains from administrative offices and transformers (described as “clean industrial equipment with no potential to transport pollutants”). They believe this is a no exposure area. Previous GP NOI stated Transformers are located on concrete pads on a gravel bed. PPC Plan Figure showed H (Transformer) with Outfall that can be sampled. <u>BMPs:</u> None identified <u>Available Sampling Data:</u> None found.</p>
005	98,600 (20% impervious)	<p><u>Sources:</u> Offsite runoff from south of the property, grassy/vegetated area, and retention pond, with transformers, chillers, roof drains and small outside storage area. PPC Plan Figure showed: (B) Outside Material/Equipment Storage (scrap metal); (C) Empty Drum Storage; (H) Transformers <u>BMPs include:</u> inspections, good housekeeping, maintenance, spill prevention and training. Outside storage is kept to a minimum and materials/drums staged outdoors are kept free of residual oils and other chemicals. Weekly visual inspections of Outfall. Previous GP NOI indicated “only clean materials are stored outside on concrete pads”. <u>Available Sampling Data:</u> None found</p>