Message

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Sent: 10/7/2021 6:43:47 PM
To: Camperson, Joseph [Camperson.Joseph@epa.gov]; Martino, Leah [Martino.Leah@epa.gov]
CC: Possler, Aron [Possler.Aron@epa.gov]; Shuart, Ryan [shuart.ryan@epa.gov]
Subject: FW: PA0013463 US Steel Fairless Hills Facility
Attachments: Current 316(b) Template Language.docx

Just forwarding some comments on an industrial permit that had a number of questions regarding application of the ELGs.

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Sent: Thursday, October 07, 2021 2:30 PM
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Cc: sefurjanic@pa.gov; Schumack, Maria <maschumack@pa.gov>; Patel, Pravin <prpatel@pa.gov>; Martinsen, Jessica <Martinsen.Jessica@epa.gov>; Hales, Dana <Hales.Dana@epa.gov>
Subject: PA0013463 US Steel Fairless Hills Facility

Ketan,

According to our Memorandum of Agreement, the Environmental Protection Agency (EPA) Region III has received the draft National Pollutant Discharge Elimination System (NPDES) permit for:

US Steel Fairless Hills Facility
NPDES Number: PA0013463
EPA Received: September 9, 2021
30-day response due date: October 9, 2021

This is a major permit that discharges to Biles Creek and the Delaware River, and is affected by the Delaware River PCB TMDL. EPA has chosen to perform a limited review of the draft permit based on the wasteload allocation (WLA) requirements of the approved Delaware River PCB TMDL, Steam Electric Power Generating Point Source Category ELG (40 CFR Part 423), Iron and Steel Manufacturing Point Source Category (40 CFR Part 420), and Clean Water Act Cooling Water Intake 316(b) and 40 CFR Part 125 (Subpart J) requirements. EPA has completed its review and as discussed in a phone conversation with EPA on October 6, 2021, EPA offers the following comments:

1. Regarding MP 103:
    a. 40 CFR Part 423.15(a)(10)(i) includes requirements for cooling tower blowdown. The quantity of total chromium and total zinc discharged in this wastestream is to be determined using the flow of cooing tower blowdown and the listed concentrations. Page 5 of the fact sheet calculates mass loads for these pollutants based on the entire flow of 2.442 MGD as opposed to cooling tower blowdown flow of 2.01 MGD. The limitations for MP 103 will need to be recalculated and revised in the fact sheet and permit.

b. 40 CFR Part 423.15(a)(10)(i) provides limitations for free available chlorine in cooling tower blowdown, but this parameter is not imposed in the permit. The permit provides limits for TRC, but the fact sheet does not an explanation as to why this parameter was utilized in the permit. 423.15(a)(8)(i) limits TRC for plants with a rated electric generating capacity of 25 or more megawatts; however, this is applicable to once through cooling water. It is unclear if once through cooling water discharges to MP103. The fact will need to clarify the applicable ELGs and pollutant parameters that are imposed in the permit.
c. While Part C of the permit includes the "no-detectable amount" requirement for the 126 priority pollutants except chromium and zinc, it does not include the requirement at 40 CFR 423.15(a)(10)(ii). The permit should be revised to include this requirement.
d. Part C of the permit will also need to include the NSPS at 40 CFR 423.15(a)(2) regarding no discharge of PCBs. As discussed, PADEP can provide a fact sheet discussion to document why PCB monitoring and PMP efforts related to the Delaware River PCB TMDL are appropriate. Additionally, PADEP will evaluate the need for influent PCB monitoring in an appropriate mechanism to evaluate influent vs. effluent PCB levels.

2. Regarding MP 403:
   a. It is unclear why some of the ELG standards for the wastestreams to MP 403 are being applied to MP 103, as opposed to MP 403. TSS, oil and grease, and pH are have standards for each applicable wastestream per 40 CFR 420.112(b), 420.102(a)(4), and 420.122(a)(1), and while these appear to have been adequately evaluated, the fact sheet doesn't explain why these TBELs were applied at MP 103.
   b. 40 CFR 420.102(a)(4) And 420.103(a)(4) both include production based limits for chromium and nickel, but mass-based limits were not evaluated and imposed at MP 403. It was discussed that PADEP would re-evaluate the TBELs for those pollutants and impose the appropriate limitations at MP 403. If limitations based on the technical development document are to be maintained in the permit, then the fact sheet would need to provide the justification. A discussion for the rationale behind limitations on copper using the technical development document should also be included in the fact sheet.
3. PADEP's current template language for 316(b) requirements (attached) includes some additional language that does not appear in this draft permit. PADEP may want to consider adding the "missing" language for clarity in the permit, if appropriate:
   a. Part C.VI.E of the permit already requires the permittee to monitor the velocity at the screen at a daily minimum frequency. PADEPs template also includes that intake screen monitoring velocity monitoring results are to be submitted on the Cooling Water Intake Monitoring Supplemental Report as an attachment to monthly DMRs.
   b. Part C.VI.G. of the permit doesn't include the requirement for the annual certification submission by January 28 of each year.

Please address the above and provide us with any changes to the draft permit and/or fact sheet, if necessary. Please contact Dana Hales on my staff via telephone at 215-814-2928 or via electronic mail at hales.dana@epa.gov.

Thank you,

Jen Fulton

Jennifer Fulton, Acting Chief
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