UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

DEC 12 2013

Ms. Linda Campbell
Environmental, Health, Safety/training & Dev. Coordinator
SAPA Extruder, Inc. – Mountain Top Operations
330 Elmwood Avenue – Crestwood Industrial park
Mountain Top, Pennsylvania 18707

Re: Industrial User Requirements
PAP245985

Dear Ms. Campbell:

In accordance with information submitted by SAPA Extruders (formerly Mideast Aluminum), your Crestwood Industrial Park facility in Mountain Top is an industrial user of a publicly owned treatment works and subject to the Aluminum Forming Category 40 CFR Part 467 Subpart C, Pretreatment Standards for New Sources (PSNS). As such, the monitoring and reporting requirements of the General Pretreatment Regulations, 40 CFR Part 403.12, apply to the discharge from the facility.

Enclosed is information regarding your requirements as an industrial user. The package sets forth updated requirements for your facility based on reported production rates from July 2009 through September 2013, including monitoring requirements that the Environmental Protection Agency (EPA) has established in accordance with 40 CFR Part 403.12(e). Appendix A includes a summary of the General Pretreatment Regulations. Please note the monitoring and reporting provisions, including the requirements for resampling whenever a violation occurs. Appendix B includes information on hazardous waste requirements under the Resource, Conservation, and Recovery Act.

New sources are required to be in compliance with the aluminum forming regulations upon commencement of discharge. After commencement of discharge, periodic compliance reports were required to be submitted to submitted to the Environmental Protection Agency (EPA) each June and December in accordance with 40 CFR Part 403.12(e). In this package, EPA, as Control Authority, is continuing the modified due dates for periodic monitoring reports. Monitoring data obtained from sampling conducted in the January through June monitoring period will be due July 31 of each year, while data obtained in the July through December monitoring period will be due January 31 of the following year.

In the event that a violation occurs, you are required to notify EPA within 24 hours of becoming aware of the violation. In addition, you are required to resample resample for those pollutants for which the violation occurred and submit the results of the resampling within 30 days of becoming aware of the violation. Although not required by the regulations, the 30 day report should also include the cause of the violation and the steps taken to ensure that it does not recur.

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This package is based on current information supplied by SAPA Extruders. The company is required to provide EPA with complete and updated information on its manufacturing operations and discharges. Any changes to the manufacturing facilities and/or discharges may result in changes to the specific requirements for your facility. Where there is a conflict between the regulatory requirements and this package, the regulatory requirement applies.

In addition, the company must comply with the requirements of any state or local agencies which may have jurisdiction. Nothing contained in this package, or in any EPA regulations is meant to restrict state or local agencies from imposing additional requirements in accordance with applicable laws including requirements which are more stringent than those imposed by EPA.

You should carefully review the enclosed information and communicate to each responsible official the actions necessary to comply with pretreatment requirements. A copy of the General Pretreatment Regulations is enclosed for your use.

In order to promote further strides in the reduction of discharges, pollution prevention in the form of source reduction such as raw material, product substitution, and process or equipment modification, recycling and reuse are being encouraged by EPA. We strongly encourage you to explore pollution prevention alternatives in your operation and implement them as appropriate.

If you have any questions, please contact Robert Hansford at (215) 814-5791 or John Lovell at (215) 814-5790.

Sincerely,

David B. McGuigan, PhD
Associate Director
Office of NPDES Permits and Enforcement
Water Protection Division

Enclosures

cc: Mike Brunamonti, PADEP Northeast Region (w/enclosures)
Ron Furlan, PADEP Central Office (w/o enclosures)

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Discharge Limitations and Monitoring Requirements

SAPA Extruders: 330 Elmwood Avenue – Crestwood Industrial Park - Mountaintop PA 18707

PAP245985

Such discharges shall be limited and monitored by the permittee as specified below:

Parameters	<——Pollutant Discharge Limits (1)——> <~~Standard [lbs/mil•off- lbs] x Production* [mil off-lbs/day]~~> <——•WWTS-1•——> <> <——•WWTS-2•——>								Monitoring Requirements (3)	
Processes	~ Core	9 • Bath	8 • Rinse	3 •Scrubbers	◙ • TOTAL	3 Bath	3 • Rinse	◙ •**TOTAL**	Frequency	Sample Type (4)
Regulated Flows									1/Month	Measure
Production Rate									1/Month	Record
pH (2)									1/Month	4grabs/chart
Chromium										
Monthly Ave	0.0019	0.0030	0.0171	0.0101	**0.0321**	0.00002	0.00019	**0.00021**	1/6 Months	4 grabs
Daily Max	0.0050	0.0075	0.0424	0.0250	**0.0798**	0.00006	0.00047	**0.00053**		
Cyanide (5)										
Monthly Ave	0.0012	0.0017	0.0090	0.0056	**0.0173**	0.00001	0.00003	**0.00004**	1/6 months	4 grabs/lab
Daily Max	0.0027	0.0040	0.0228	0.0135	**0.0431**	0.00003	0.00008	**0.00011**		
Zinc										
Monthly Ave	0.0058	0.0084	0.0482	0.0281	**0.0903**	0.00007	0.00053	**0.00060**	1/3 Months	4 grab
Daily Max	0.0135	0.0204	0.1158	0.0682	**0.2178**	0.00016	0.00128	**0.00144**		
Oil & Grease (5)	0.1307	0.1997	1.1337	0.6688	**2.1340**	0.00054	0.00417	**0.00471**	1/3 months	4 grabs

* Production Rate… the average production per discharge day processed through a given unit operation and is calculated by dividing the total production during the six-month reporting period by the number of discharge days during the six-month reporting period.

1. Pollutant discharge allocations are cumulative for the core (quench, etc.) and each ancillary (bath, rinse/multiple rinse, scrubber) operation.

2. pH shall not be less than 5.0 standard units at any time and shall be monitored at least once a month or continuously by a pH monitoring device.

3. Process wastewater samples taken in compliance with the monitoring requirements specified above shall be designated as…
   (a) WWTS-1 collected at the Sampling & Recording Test Location and shall indicate which processes are represented by the sample. WWTS-1 flow routing is as depicted below…
   [core/ baths/ rinses/scrubbers]===>[Treatment/Lamella]===>[miscellaneous]===>**[sample]**===>POTW

   (b) WWTS-2 collected from the partswasher operations discharges via the Holding Tanks. The (SAPA-9/13) wash/rinse routing through the etch and desmut tanks is as depicted below…
   [wash]=>[rinse]=>[etch=>rinse #1=>rinse #2]=>[desmut=>rinse]=>[ww water rinse]…=>[Holding Tank].
   └(300#) └——(no change tnks)——┘

4. Compliance sampling shall be conducted during the discharge period of 1 calendar day and shall consist of a) flow- proportional composites collected after the passage of a defined volume of the discharge, or b) a series of 4 separate grab samples taken over the discharge period. Grab samples for cyanide and oil & grease may be combined in the lab prior to analysis on a flow-proportional basis or analyzed separately and the test results averaged to derive a daily maximum value. Grab samples for pH must be analyzed separately.

5. Alternative to TTO monitoring.

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