Guzek Associates, Inc.

Mechanical, Electrical, Structural,
Environmental, and Architectural Engineering

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401 DAVIS STREET
CLARKS SUMMIT, PA 18411-1837

December 22, 2015

U.S. EPA – Region III
1650 Arch Street
Philadelphia, PA 19103-2029

RECEIVED
EPA REGION III
DEC 28 2015
WATER PROTECTION DIVISION
(3WP00)

Attention: Mr. John Lovell (3WP41)
Pretreatment Coordinator

Reference: SAPA Extruders, Inc.
Permit No. PAP245985

Dear Mr. Lovell:

On behalf of my above-referenced Client, I wish to thank you for your 9/16/2015 letter with draft revisions to SAPA's Effluent Discharge Permit. I have reviewed your Industrial User Fact Sheet (copy attached) and, after consultation with Mike Bogdon of SAPA, I wish to confirm your process descriptions, counts, allocations, and calculated revised limits are true, accurate, and correct. Further, please be advised of the following clarification on SAPA's Extrusion Press Leakage.

> A discharge allocation for Extrusion Press Leakage is still not applicable in this case because there are no drain pipes from the areas or sumps near the Extrusion Presses, and no spillage or leakage is discharged to SAPA's Pretreatment facility. In the event of lubricating oil leakage from the Press or its ancillary components, SAPA collects all liquids in 55-gallon drums for offsite disposal.

Thank you for your proposed updates to SAPA's Discharge Limitations and Monitoring Requirements.

Very truly yours,

Joe Guzek

Joseph J. Guzek, P.E.

Enclosure (1 page)

E-cc: Mike Bogdon
Linda Campbell

CERTIFIED RETURN RECEIPT-REQUESTED MAIL #7015 1520 0000 6676 5865

SAPA\15_707\Comments on EDP Draft-EPA

Industrial User Fact Sheet*

*(Guzek Associates 5/4/15 Operations Update)

SAPA Extruders, Inc. • PAP245985

330 Elmwood Avenue – Crestwood Industrial Park – Mountain Top Pa 18707

• Mfg. Process Description :

<——————————(Aluminum Billets)——————————>

53% Shipped <————(0.105518 mil off-lbs/day)————> 47% Processed

• Operations Layout:

```
                    ┌──(43%)──>[ANODIZING DEPT.]──────────>[black <(Dye)>gold]==> ship
                    │            (14 bath • 14 rinse • 3 scrubber)
53 % Shipped<──[EXTRUSION (100%)]
                    └──(4%)──>[FABRICATION DEPT.] ==> ship
                                 (3 bath • 4 rinse)
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• Regulatory Category: Aluminum Forming 40 Part 467 Subpart C – (PSNS)…

(major expansion at the facility after 1982 NS date) • (Metal Finishing not applicable based on §433.10(b) and §467.01(a))

• Pollutant Limits Standards: DMax(Cr)MAve ~ DMax(CN)MAve ~ DMax(Zn)MAve ~ DMax(O&G)/MAve

-> core.------	.13	.05	.07	.03	.35	.15	3.40	3.40
-> bath ------	.067	.027	.036	.015	.183	.075	1.79	1.79
-> rinse -----	.52	.21	.28	.11	1.42	.59	13.91	13.91
-> scrubber .	.72	.29	.39	.16	1.97	.81	19.33	19.33
-> press ht tr.	.76	.31	.41	.17	2.08	.86	20.37	20.37

• Discharge Limits Summary: (process x production x standard)…

operation ~ #	production	•---------- lbs/day ---------•						
Process	mil off-lbs/dy*	[DMax<Cr>MAve]	•	[DMax<CN>MAve]	•	[DMax<Zn>MAve]		— O&G —
Core……..	.105518	.0137	.0053	.0074	.0032	.0369	.0158	.3588
Press Ht Treatm	"	.0802	.0327	.0433	.0179	.2194	.0907	2.1494
Anodize Dept	.0454							
->12 bath	"	.0365	.0147	.0196	.0082	.0997	.0409	.9752
->12 rinse	"	.2831	.1143	.1525	.0599	.7736	.3214	7.5782
->3 scrubber	"	.0980	.0395	.0531	.0218	.2681	.1102	2.6327
->1bath	.00211	.0001	.0001	.0001	.0000	.0004	.0002	.0038
->1 rinse	"	.0011	.0004	.0006	.0002	.0030	.0012	.0292
-> 1 bath	.00021	.0000	.0000	.0000	.0000	.0000	.0000	.0004
->1 rinse	"	.0001	.0000	.0001	.0000	.0003	.0001	.0028
Fabrication Dept	.004222							
-> 3 bath	"	.0009	.0003	.0005	.0002	.0023	.0009	.0226
-> 4 rinse	"	.0088	.0035	.0047	.0002	.0239	.0099	.2337
revised limits•==>		.5225	<> .2108	• .2819	<> .1116	• 1.4273	<> .5912	• 13.9868
former limits•==>		.00053	┬ .00021	.00011	┬ .00004	.00144	┬ .00060	┬ .00471
		.01000		.01000		2.890		1.1

WWTS - 2's

mg/L

•----------test results (#/dy) 2nd half 2014----------•

• Monitoring Requirement.. pending pollutant test results subsequent to the cessation of WWTS-2

(Sample Point) (Cr ~ CN ~ Zn ~ O&G) (pH ~ Production ~ Total Flow ~ regulated Flow)

WWTS-1 <-----[1/3 months]------> <---------- [1/month]---------->

• Off-Site Disposal:

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                    ╔═══════▶[Solids Separator]═══>[Holding Tank]
Extruded parts•═══> [Vibratory Debur]◀═══════════════════════════╝
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