

Community Advisory Group (CAG) Minutes for Feb. 7, 2011

Present: Maria Coles, Ken Deschere, Regina Deschere, Jennifer Dotson, Peter Fortunato, Michele Palmer, Leia Raphaelidis, Eric Rosario, Kathy Woodcock

City Staff: Nels Bohn, Facilitator

Guests: John Graves, President of the South Hill Civic Association; Liz Cameron of Tompkins County Health Environmental Dept.; Susan Pratt, Barbara Lifton's Ithaca Office "Chief of Staff"

Minutes from the January 3, 2011 CAG meeting are approved and will be posted on the City of Ithaca website.

GENERAL DISCUSSION:

Town of Ithaca Board - Maria Coles spoke with Town of Ithaca Board members Rich DePaolo and Bill Goodman about attending our meetings. She will follow-up with Mayor Peterson and ask her to work with Town Supervisor Herb Engman to appoint someone from the Town Board, because contamination exists in the town but migrates into the city.

Therm Home Toxin Test Results – Information has not been released yet although it has been approximately 60 days. Karen Cahill reported there were delays in processing.

Therm Legal Ad was posted in the Ithaca Journal on 1/27/11 – Therm is requesting that ground and storm water run-off monthly monitoring be changed to quarterly monitoring. Supposedly this type of discharge will not have a significant impact on the environment. Comments can be submitted in writing no later than February 25, 2011.

Therm has built new construction and paved, so Michele Palmer thinks they must have applied for a drainage permit. This legal notice came from the Albany DEC office, whereas analysis of and supervision of steps taken related to Ithaca toxin pollution is handled through the Syracuse DEC office. The question arose as to whether these two departments have communicated? Ms. Cahill **has** contacted the Albany office.

CAG is concerned about chemical toxin monitoring. Leia Raphaelidis wonders whether there a time period for analyzing toxins? Ken Deschere said the vapor intrusion testing protocol includes roughly 65 chemicals, but the list considered "site-related" and "chemicals of concern" has been narrowed down to 8 chemicals.

Soap Foaming Downstream – Peter Fortunato has not heard back from IC regarding the cause of the soap suds flowing downhill towards Six Mile Creek. Kathy Woodcock recently smelled soap suds again while walking on the Six Mile Recreation Way, so it may be a reoccurring problem?

SITES UPDATES:

***See the attached progress report from the Department of Conservation (DEC)**

Emerson Sign Posting – John Graves investigated and a guard yelled at him not to trespass or he would be arrested. J. Graves explained to the guard that it has been a month since equipment was auctioned off but no signs have been posted. The guard said locks are on the buildings and keys have been given to the Police and Fire Departments. Security guards have been hired for one year. Eric Rosario will follow-up about lack of signs with DEC. It could be a liability issue? Tom Parsons, Fire House Assistant, should be invited to attend a CAG meeting to hear Emerson neighborhood complaints.

Markles Flats Appeal – The City of Ithaca did appeal a judge’s recent decision to give the school district the power of determination.

Assignments:

Ken and Regina Deschere – Invite Tom Parsons to CAG and other future guest speakers
Determine whether Therm legal ad needs a response by Feb. 25
Maria Coles – Speak with mayor about appointing a Town of Ithaca representative
Eric Rosario – Follow-up with Karen Cahill about lack of posted signs

Next Meeting Schedule:

Monday, March 7, 2011 at City Hall, 2nd floor Conference Room, 6-7:30 p.m.

Attachments:

Therm SPDES Legal Notice (prints more readably on legal-size paper)
Updates from Syracuse DEC on Ithaca Sites
Therm Draft SPDES permit
Industrial Factsheet

Legals 050

Legals 050

1/27/11
 Ithaca
 Journal
 Therm

New York State
 Department of
 Environmental
 Conservation

Notice of Intent to Modify
 Date: January 14, 2011
 Permittee: THERM INC
 PO BOX 220
 ITHACA, NY 14851-0220
 Facility: THERM INC
 HUDSON ST EXT
 ITHACA, NY 14850

Application ID:
 7-5030-00016/00005

Permits(s) being Modified:
 1 - Article 17 Titles 7 & 8 Industrial SPDES - Surface Discharge

Project is located: in ITHACA in TOMPKINS COUNTY

Project Description:
 The New York State Department of Environmental Conservation (DEC) is pursuing a Department Initiated Modification (DIM) to the State Pollutant Discharge Elimination System (SPDES) Permit (NY0244261), pursuant to 6 NYCRR Part 750-1.18, and 750-1.19, the Priority Ranking System known as New York State's Environmental Benefit Permit Strategy (EBPS).

Therm Incorporated focuses on various machine processes. The facility specializes in the preparation of airfoil components for the aerospace and industrial turbine industry. No process wastewater is discharged through surface water outfalls. Outfalls discharge groundwater and stormwater runoff only; The facility has discharge to a drainage ditch tributary to Six Mile Creek; a class C water.

The following changes to the permit are proposed
 Outfall 001: Monitoring for two parameters has been removed and will be monitored at Outfall O1A. Water Quality Based Effluent Limit for Total Iron was increased; as a result of a new water quality standard.

Outfall O1A: Monitoring and limits for parameters have been removed since they have not been detected in the effluent during the last three year period and beyond. The monitoring frequency for the remaining parameters has been reduced from Monthly to Quarterly. These parameters are either consistently below limits or have rarely been detected. The Tetrachloroethylene limit has been retained. A quarterly total suspended solids limit was added to the permit based on best professional judgement.

Best Management Practices plan requirement has been added. The monitoring locations page has been updated. Discharge Notifications Act page has been added. The recording,

reporting and additional monitoring requirements page has been updated.

A availability of Application Documents: Filed application documents, and Department draft permits where applicable, are available for inspection during normal business hours at the address of the contact person. To ensure timely service at the time of inspection, it is recommended that an appointment be made with the contact person.

State Environmental Quality Review (SEQR) Determination

Project is an Unlisted Action and will not have a significant impact on the environment. A Negative Declaration is on file. A coordinated review was not performed.

SEQR Lead Agency None Designated

State Historic Preservation Act (SHPA) Determination
 The proposed activity is not subject to review in accordance with SHP A. The permit type is exempt or the activity is being reviewed in accordance with federal historic preservation regulations.

Coastal Management

This project is not located in a Coastal Management area and is not subject to the Waterfront Revitalization and Coastal Resources Act.

Availability For Public Comment

Comments on this project must be submitted in writing to the Contact Person no later than 02/25/2011 or 30 days after the publication date of this notice, whichever is later.

Contact Person
 TERESA DIEHSNER
 NYSDEC
 625 BROADWAY
 ALBANY, NY 12233
 (518) 402-9167
 1/27/2011

LEGAL NOTICE

The Chemung-Schuyler-Stauben Workforce New York (CSSWFNY) on behalf of the Southern Tier of New York 13N (STNY 13N) Partnership, is requesting proposals for implementing Round 3 of the STNY-13N Regional Talent Pipeline Development across the Southern Tier of New York State.

The purpose of this Request for Proposals (RFP) is to solicit initiatives that seek to increase the region's competitive strength and advantage by improving the supply and quality of the region's talent pipeline for the advanced manufacturing sector through transformation strategies developed by the Southern Tier of New York 13N Partnership. The STNY 13N

Feb. 4 2011 Update on Ithaca Sites from Stephanie Harrington, Syracuse DEC

Campagnolo Property (Site No. 755013)

Initial lab results from the December 2010 soil vapor intrusion sampling are going through the data validation process. Letters describing the results will be sent to the homeowners within 30-days after data validation is complete. The Responsible Party (RP) is considering entering into an Order on Consent (Order) with the State to perform the selected remedy documented in the Record of Decision for this site. If the RP declines to enter into the Order, the State will continue to implement the remedial program in accordance with applicable State and Federal Law.

315 North Meadow Street (Site No. 755014)

The DEC is sending an Order on Consent (Order) to the Potential Responsible Parties (PRPs) as an offer to implement the Record of Decision. If the PRPs decline the to enter into the Order, the State will implement the remedial program in accordance with applicable State and Federal Law.

Clinton West Plaza (Site No. 755015)

The remedial design contract been administered and the remedial design work has been started. Sub-slab vacuum pressure testing has been conducted at the commercial building. Information from this testing will be used in the design of the sub-slab depressurization (SSD) system. The SSD system will be installed by the end of February 2011. Monitoring for Vapor Intrusion at the site and at the residential structures within the immediate vicinity of the site expected to be initiated in February 2011.

The first phase of the pre-remedial design investigation will begin in March/April 2011 and will include the installation and development of additional site monitoring wells, groundwater sampling, and soil boring advancement for the purposes of subsurface soil sample collection. Additional groundwater sampling may be conducted; the groundwater sampling data will be used to aid in the remedial design. All of this work is being conducted pursuant to the ROD for this site.

Feb. 7 2011 Update on Ithaca Sites from Karen Cahill, Syracuse DEC

Therm Neighborhood Test Results

I cannot estimate at this time when we would be having a public meeting on the Phase VII investigation as we have just received the results analytical (yet to be validated). Once the Department has reviewed the validated results and DOH has made their recommendations, I will have a better idea on the future schedule.

Therm SPDES Legal Notice

I am not too familiar with SPDES permit modifications, but in reading this notice, it sounds as if a review was done by DEC on the existing permit and changes are being proposed based on historical sampling data. Also, the effluent limit for iron was increased, so DEC may be proposing changes to all permits with iron included in the sampling schedule. The notice indicates that the PCE limit was retained, so I have no comments/concerns on this proposed modification

[30 minutes later] In response to your concerns, please see attached:

- 1) Therm Draft SPDES permit
- 2) Industrial Factsheet

Our permit division informed me that generally, the Department Initiated Modification (DIM) is noticed and the draft permit and fact sheet are public. The public comment period runs until 2/25/11, so if the CAG has comments on the draft, submit them, in writing, to the contact person Teresa Dieshner who is handling this modification out of the Albany office. They will review all comments received and then provide a response. I am also going to be discussing this DIM with our industrial permits division.



NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
State Pollutant Discharge Elimination System (SPDES)
DISCHARGE PERMIT

Industrial Code:	9511	SPDES Number:	NY0244261
Discharge Class (CL):	01	DEC Number:	7-5030-00016/00001
Toxic Class (TX):	T	Effective Date (EDP):	10/01/2010
Major Drainage Basin:	07	Expiration Date (ExDP):	09/30/2015
Sub Drainage Basin:	05	Modification Dates:(EDPM)	
Water Index Number:	ONT 66-12-P296-75		
Compact Area:			

This SPDES permit is issued in compliance with Title 8 of Article 17 of the Environmental Conservation Law of New York State and in compliance with the Clean Water Act, as amended, (33 U.S.C. §1251 et.seq.)(hereinafter referred to as "the Act").

PERMITTEE NAME AND ADDRESS

Name:	Therm Incorporated	Attention:	Robert R. Sprole, III
Street:	1000 Hudson Street Extension		
City:	Ithaca	State:	NY
		Zip Code:	14850

is authorized to discharge from the facility described below:

FACILITY NAME AND ADDRESS

Name:	Therm Incorporated		
Location (C,T,V):	Ithaca (C)	County:	Tompkins
Facility Address:	1000 Hudson Street Extension		
City:	Ithaca	State:	NY
		Zip Code:	14850
NYTM -E:		NYTM - N:	

From Outfall No.: 001 at Latitude: 42 ° 25 ' 15 '' & Longitude: 76 ° 29 ' 15 ''

into receiving waters known as: Drainage Ditch Tributary to Six Mile Creek Class: C

and; (list other Outfalls, Receiving Waters & Water Classifications)

01A, 002, 003 Drainage Ditch Tributary to Six Mile Creek Class: C

in accordance with: effluent limitations; monitoring and reporting requirements; other provisions and conditions set forth in this permit; and 6 NYCRR Part 750-1.2(a) and 750-2.

DISCHARGE MONITORING REPORT (DMR) MAILING ADDRESS

Mailing Name:	Therm Incorporated		
Street:	1000 Hudson Street Extension		
City:	Ithaca	State:	NY
		Zip Code:	14850
Responsible Official or Agent:	Robert R. Sprole, III	Phone:	(607) 272-8500

This permit and the authorization to discharge shall expire on midnight of the expiration date shown above and the permittee shall not discharge after the expiration date unless this permit has been renewed, or extended pursuant to law. To be authorized to discharge beyond the expiration date, the permittee shall apply for permit renewal not less than 180 days prior to the expiration date shown above.

DISTRIBUTION:

CO BWP - Permit Coordinator
 RWE – Region 7
 RPA – Region 7
 EPA Region II - Michelle Josilo

Permit Administrator:	
Address:	
Signature:	Date: / /

PERMIT LIMITS, LEVELS AND MONITORING DEFINITIONS

OUTFALL	WASTEWATER TYPE	RECEIVING WATER	EFFECTIVE	EXPIRING		
	This cell describes the type of wastewater authorized for discharge. Examples include process or sanitary wastewater, storm water, non-contact cooling water.	This cell lists classified waters of the state to which the listed outfall discharges.	The date this page starts in effect. (e.g. EDP or EDPM)	The date this page is no longer in effect. (e.g. ExDP)		
PARAMETER	MINIMUM	MAXIMUM	UNITS	SAMPLE FREQ.	SAMPLE TYPE	
e.g. pH, TRC, Temperature, D.O.	The minimum level that must be maintained at all instants in time.	The maximum level that may not be exceeded at any instant in time.	SU, °F, mg/l, etc.			
PARA-METER	EFFLUENT LIMIT	PRACTICAL QUANTITATION LIMIT (ML)	ACTION LEVEL	UNITS	SAMPLE FREQUENCY	SAMPLE TYPE
	Limit types are defined below in Note 1. The effluent limit is developed based on the more stringent of technology-based standards, required under the Clean Water Act, or New York State water quality standards. The limit has been derived based on existing assumptions and rules. These assumptions include receiving water hardness, pH and temperature; rates of this and other discharges to the receiving stream; etc. If assumptions or rules change the limit may, after due process and modification of this permit change.	For the purposes of compliance assessment, the analytical method specified in the permit shall be used to monitor the amount of the pollutant in the outfall to this level, provided that the laboratory analyst has complied with the specified quality assurance/quality control procedures in the relevant method. Monitoring results that are lower than this level must be reported, but shall not be used to determine compliance with the calculated limit. This ML can be neither lowered nor raised without a modification of this permit.	Action Levels are monitoring requirements, as defined below in Note 2, that trigger additional monitoring and permit review when exceeded.	This can include units of flow, pH, mass, Temperature, concentration. Examples include µg/l, lbs/d, etc.	Examples include Daily, 3/week, weekly, 2/month, monthly, quarterly, 2/yr and yearly.	Examples include grab, 24 hour composite and 3 grab samples collected over a 6 hour period.

Note 1: DAILY DISCHARGE: The discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for the purposes of sampling. For pollutants expressed in units of mass, the ‘daily discharge’ is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurement, the ‘daily discharge’ is calculated as the average measurement of the pollutant over the day. **DAILY MAX:** The highest allowable daily discharge. **DAILY MIN:** The lowest allowable daily discharge. **MONTHLY AVG (daily avg):** The highest allowable average of daily discharges over a calendar month, calculated as the sum of each of the daily discharges measured during a calendar month divided by the number of daily discharges measured during that month. **RANGE:** The minimum and maximum instantaneous measurements for the reporting period must remain between the two values shown. **7 DAY ARITHMETIC MEAN (7 day average):** The highest allowable average of daily discharges over a calendar week. **12 MRA (twelve month rolling avg):** The average of the most recent twelve month’s monthly averages. **30 DAY GEOMETRIC MEAN (30 d geo mean):** The highest allowable geometric mean of daily discharges over a calendar month, calculated as the antilog of : the sum of the log of each of the daily discharges measured during a calendar month divided by the number of daily discharges measured during that month. **7 DAY GEOMETRIC MEAN (7 d geo mean):** The highest allowable geometric mean of daily discharges over a calendar week.

Note 2: ACTION LEVELS: Routine Action Level monitoring results, if not provided for on the Discharge Monitoring Report (DMR) form, shall be appended to the DMR for the period during which the sampling was conducted. If the additional monitoring requirement is triggered as noted below, the permittee shall undertake a short-term, high-intensity monitoring program for the parameter(s). Samples identical to those required for routine monitoring purposes shall be taken on each of at least three consecutive operating and discharging days and analyzed. Results shall be expressed in terms of both concentration and mass, and shall be submitted no later than the end of the third month following the month when the additional monitoring requirement was triggered. Results may be appended to the DMR or transmitted under separate cover to the same address. If levels higher than the Action Levels are confirmed, the permit may be reopened by the Department for consideration of revised Action Levels or effluent limits. The permittee is not authorized to discharge any of the listed parameters at levels which may cause or contribute to a violation of water quality standards. The additional monitoring requirement is triggered upon receipt by the permittee of any monitoring results in excess of the stated Action Level.

PERMIT LIMITS, LEVELS AND MONITORING

OUTFALL No.	WASTEWATER TYPE	RECEIVING WATER	EFFECTIVE	EXPIRING			
001	Stormwater bypass (outlet for flows in excess of capacity of the oil/water separator)	Drainage Ditch Tributary to Six Mile Creek	EDPM	09/30/2015			
PARAMETER	EFFLUENT		MONITORING ACTION LEVEL	UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FN
	Monthly Avg.	Daily Max.					
Flow	-	Monitor		gpd	Quarterly	Instantaneous	

OUTFALL No.	WASTEWATER TYPE	RECEIVING WATER	EFFECTIVE	EXPIRING			
01A ¹	Storm water and groundwater infiltration through Oil/Water Separator	Drainage Ditch Tributary to Six Mile Creek	EDPM	09/30/2015			
PARAMETER	MINIMUM	MAXIMUM	UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FOOTNOTES (FN)	
pH	6.0	9.0	SU	Quarterly	Grab		
PARAMETER	EFFLUENT		MONITORING ACTION LEVEL	UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FN
	Monthly Avg.	Daily Max.					
Flow	-	Monitor		gpd	Instantaneous	Grab	
Oil & Grease	-	15		mg/l	Quarterly	Grab	
Total Suspended Solids	-	50		mg/l	Quarterly	Grab	
Copper, Total	-	0.088		mg/l	Quarterly	Grab	
Iron, Total	-	0.6		mg/l	Quarterly	Grab	
Tetrachloroethylene	-	0.002		mg/l	Quarterly	Grab	

OUTFALL No.	WASTEWATER TYPE	RECEIVING WATER	EFFECTIVE	EXPIRING			
002	Stormwater	Drainage Ditch Tributary to Six Mile Creek	EDPM	09/30/2015			
PARAMETER	EFFLUENT		MONITORING ACTION LEVEL	UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FN
	Monthly Avg.	Daily Max.					
Tetrachloroethylene	-	-	0.005	mg/l	Quarterly	Grab	

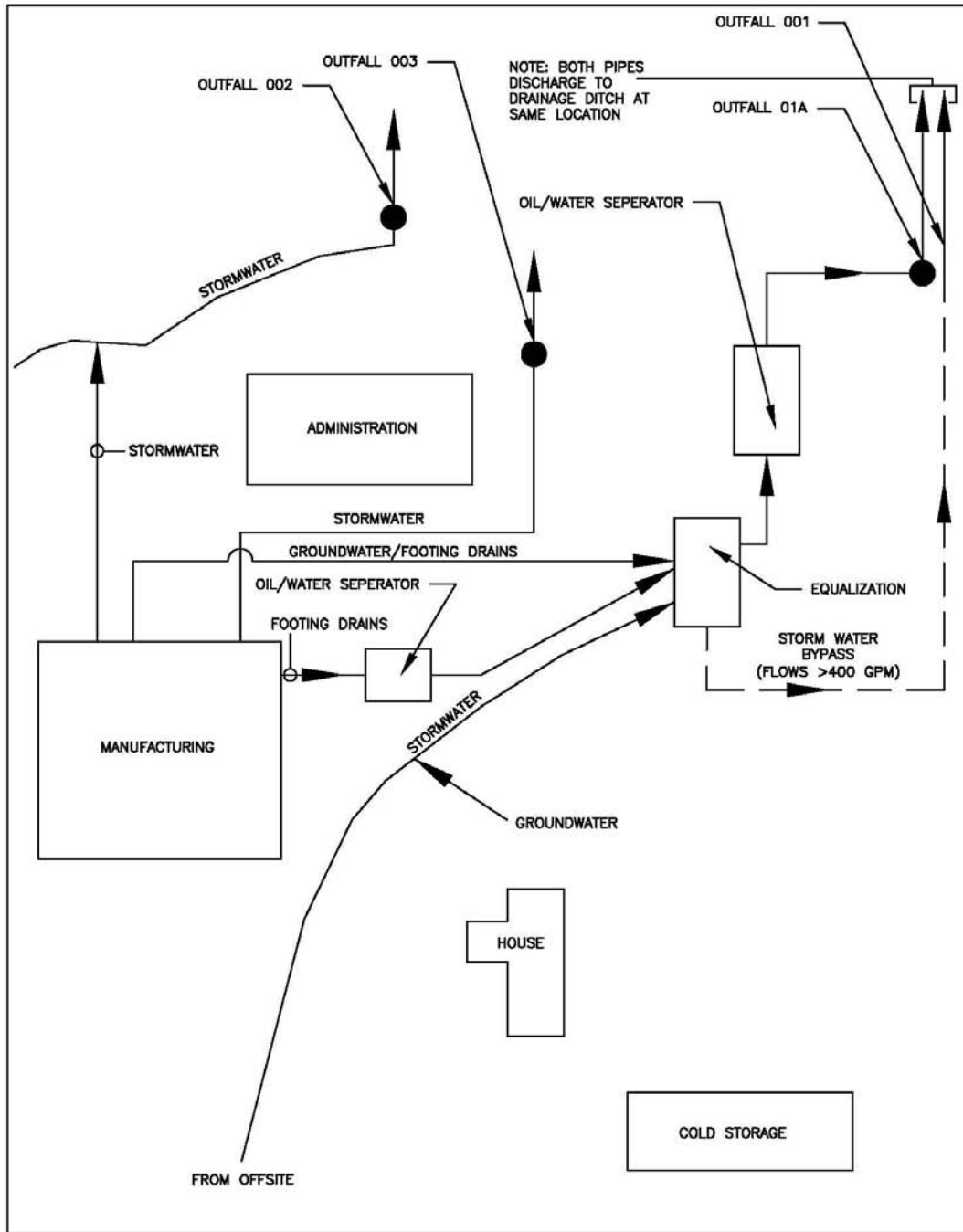
OUTFALL No.	WASTEWATER TYPE	RECEIVING WATER	EFFECTIVE	EXPIRING
003	Stormwater	Drainage Ditch Tributary to Six Mile Creek	EDPM	09/30/2015
NO MONITORING REQUIRED				

Footnotes:

Note 1 - Sampling of Outfall 01A shall be conducted on the first day flow is present in each monitoring period.

MONITORING LOCATIONS

The permittee shall take samples and measurements, to comply with the monitoring requirements specified in this permit, at the location(s) specified below:



<p>Seeler Engineering, P.C. 1151 PITTSFORD-VICTOR ROAD, SUITE 125 PITTSFORD, NEW YORK 14534 PHONE 585-248-9520 FAX 585-248-9532</p>	<p>PROPOSED PERMIT MODIFICATION THERM INCORPORATED ITHACA, NEW YORK</p>	<p>FIGURE NUMBER 2</p>
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SPECIAL CONDITIONS - INDUSTRY BEST MANAGEMENT PRACTICES

1. **General** - The permittee shall develop, maintain, and implement a Best Management Practices (BMP) plan to prevent releases of significant amounts of pollutants to the waters of the State through plant site runoff; spillage and leaks; sludge or waste disposal; and stormwater discharges including, but not limited to, drainage from raw material storage.

The BMP plan shall be documented in narrative form and shall include the 13 minimum BMPs and any necessary plot plans, drawings, or maps. Other documents already prepared for the facility such as a Safety Manual or a Spill Prevention, Control and Countermeasure (SPCC) plan may be used as part of the plan and may be incorporated by reference. A copy of the current BMP plan shall be submitted to the Department as required in item (2.) below and a copy must be maintained at the facility and shall be available to authorized Department representatives upon request.
2. **Compliance Deadlines** - The initial completed BMP plan shall be submitted, by **EDPM + 6 months**, to the Regional Water Engineer. The BMP plan shall be implemented within 6 months of submission. The BMP plan shall be reviewed annually and shall be modified whenever: (a) changes at the facility materially increase the potential for releases of pollutants; (b) actual releases indicate the plan is inadequate, or (c) a letter from the Department identifies inadequacies in the plan. The permittee shall certify in writing, as an attachment to the December Discharge Monitoring Report (DMR), that the annual review has been completed. All BMP plan revisions (with the exception of SWPPPs - see item (4.B.) below) must be submitted to the Regional Water Engineer within 30 days. Note that the permittee is not required to obtain Department approval of the BMP plan (or of any SWPPPs) unless notified otherwise. Subsequent modifications to or renewal of this permit does not reset or revise these deadlines unless a new deadline is set explicitly by such permit modification or renewal.
3. **Facility Review** - The permittee shall review all facility components or systems (including but not limited to material storage areas; in-plant transfer, process, and material handling areas; loading and unloading operations; storm water, erosion, and sediment control measures; process emergency control systems; and sludge and waste disposal areas) where materials or pollutants are used, manufactured, stored or handled to evaluate the potential for the release of pollutants to the waters of the State. In performing such an evaluation, the permittee shall consider such factors as the probability of equipment failure or improper operation, cross-contamination of storm water by process materials, settlement of facility air emissions, the effects of natural phenomena such as freezing temperatures and precipitation, fires, and the facility's history of spills and leaks. The relative toxicity of the pollutant shall be considered in determining the significance of potential releases.
4. **A. 13 BMPs** - Whenever the potential for a release of pollutants to State waters is determined to be present, the permittee shall identify BMPs that have been established to prevent or minimize such potential releases. Where BMPs are inadequate or absent, appropriate BMPs shall be established. In selecting appropriate BMPs, the permittee shall consider good industry practices and, where appropriate, structural measures such as secondary containment and erosion/sediment control devices and practices. USEPA guidance for development of stormwater elements of the BMP is available in the September 1992 manual *Storm Water Management for Industrial Activities*, EPA 832-R-92-006 (available from NTIS, (703) 487-4650, order # PB 92235969).

The BMPs are listed below:

- | | | |
|-------------------------------------|---|---------------------------------|
| 1. BMP Pollution Prevention Team | 6. Security | 10. Spill Prevention & Response |
| 2. Reporting of BMP Incidents | 7. Preventive Maintenance | 11. Erosion & Sediment Control |
| 3. Risk Identification & Assessment | 8. Good Housekeeping | 12. Management of Runoff |
| 4. Employee Training | 9. Materials/Waste Handling, Storage, & Compatibility | 13. Street Sweeping |
| 5. Inspections and Records | | |

Note that for some facilities, especially those with few employees, some of the above BMPs may not be applicable. It is acceptable in these cases to indicate "Not Applicable" for the portion(s) of the BMP Plan that do not apply to your facility, along with an explanation.

B. Stormwater Pollution Prevention Plans (SWPPPs) Required for Discharges of Stormwater From Construction Activity to Surface Waters

- As part of BMP #11, a SWPPP shall be developed prior to the initiation of any site disturbance of one acre or more of uncontaminated area. Uncontaminated area means soils or groundwater which are free of contamination by any toxic or non-conventional pollutants identified in Tables 6-10 of SPDES application Form NY-2C.

SPECIAL CONDITIONS - INDUSTRY BEST MANAGEMENT PRACTICES-Continued

Disturbance of any size contaminated area(s) and the resulting discharge of contaminated stormwater is not authorized by this permit unless the discharge is under State or Federal oversight as part of a remedial program or after review by the Regional Water Engineer; nor is such discharge authorized by any SPDES general permit for stormwater discharges. SWPPPs are not required for discharges of stormwater from construction activity to groundwaters.

The SWPPP shall conform to the *New York Standards and Specifications for Erosion and Sediment Control* and *New York State Stormwater Management Design Manual*, unless a variance has been obtained from the Regional Water Engineer, and to any local requirements. The permittee shall submit a copy of the SWPPP and any amendments thereto to the local governing body and any other authorized agency having jurisdiction or regulatory control over the construction activity **at least 30 days prior to soil disturbance**. The SWPPP shall also be submitted to the Regional Water Engineer if contamination, as defined above, is involved and the permittee must obtain a determination of any SPDES permit modifications and/or additional treatment which may be required prior to soil disturbance. Otherwise, the SWPPP shall be submitted to the Department only upon request. When a SWPPP is required, a properly completed *Notice of Intent* (NOI) form shall be submitted (available at www.dec.ny.gov/chemical/43133.html) prior to soil disturbance. Note that submission of a NOI is required for informational purposes; the permittee is not eligible for and will not obtain coverage under any SPDES general permit for stormwater discharges, nor are any additional permit fees incurred. SWPPPs must be developed and submitted for subsequent site disturbances in accordance with the above requirements. The permittee is responsible for ensuring that the provisions of each SWPPP are properly implemented.

DISCHARGE NOTIFICATION REQUIREMENTS

- a) The permittee shall maintain the existing identification signs at all outfalls to surface waters, which have not been waived by the Department in accordance with ECL 17-0815-a. The sign(s) shall be conspicuous, legible and in as close proximity to the point of discharge as is reasonably possible while ensuring the maximum visibility from the surface water and shore. The signs shall be installed in such a manner to pose minimal hazard to navigation, bathing or other water related activities. If the public has access to the water from the land in the vicinity of the outfall, an identical sign shall be posted to be visible from the direction approaching the surface water.

The signs shall have **minimum** dimensions of eighteen inches by twenty four inches (18" x 24") and shall have white letters on a green background and contain the following information:

<p style="text-align: center;">N.Y.S. PERMITTED DISCHARGE POINT</p> <p style="text-align: center;">SPDES PERMIT No.: NY _____</p> <p style="text-align: center;">OUTFALL No. : _____</p> <p>For information about this permitted discharge contact:</p> <p>Permittee Name: _____</p> <p>Permittee Contact: _____</p> <p>Permittee Phone: () - ### - ####</p> <p>OR:</p> <p>NYSDEC Division of Water Regional Office Address :</p> <p>NYSDEC Division of Water Regional Phone: () - ### -####</p>

- b) For each discharge required to have a sign in accordance with a), the permittee shall provide for public review at a repository accessible to the public, copies of the Discharge Monitoring Reports (DMRs) as required by the **RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS** page of this permit. This repository shall be open to the public, at a minimum, during normal daytime business hours. The repository may be at the business office repository of the permittee or at an off-premises location of its choice (such location shall be the village, town, city or county clerk's office, the local library or other location as approved by the Department). In accordance with the **RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS** page of your permit, each DMR shall be maintained on record for a period of five years.
- c) The permittee shall periodically inspect the outfall identification signs in order to ensure that they are maintained, are still visible and contain information that is current and factually correct.

RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS

- a) The permittee shall also refer to 6 NYCRR Part 750-1.2(a) and 750-2 for additional information concerning monitoring and reporting requirements and conditions.
- b) The monitoring information required by this permit shall be summarized, signed and retained for a period of five years from the date of the sampling for subsequent inspection by the Department or its designated agent. **Also, monitoring information required by this permit shall be summarized and reported by submitting;**

(if box is checked) completed and signed Discharge Monitoring Report (DMR) forms for each 1 month reporting period to the locations specified below. Blank forms are available at the Department's Albany office listed below. The first reporting period begins on the effective date of this permit and the reports will be due no later than the 28th day of the month following the end of each reporting period.

(if box is checked) an annual report to the Regional Water Engineer at the address specified below. The annual report is due by February 1 and must summarize information for January to December of the previous year in a format acceptable to the Department.

(if box is checked) a monthly "Wastewater Facility Operation Report..." (form 92-15-7) to the:

Regional Water Engineer and/or County Health Department or Environmental Control Agency specified below

Send the DMRs with **original signatures** to:

Department of Environmental Conservation
Division of Water
Bureau of Water Compliance Programs
625 Broadway
Albany, New York 12233-3506

Phone: (518) 402-8177

Send a **copy** of each DMR page to:

Department of Environmental Conservation
Regional Water Engineer
6150 Erie Boulevard West
Syracuse, New York 13204-2400

Phone: (315) 426-7500

Send an **additional copy** of each DMR page to:

Tompkins County Health Department
Div. of Environmental Health
401 Harris B. Dates Drive
Ithaca, New York 14850

- c) Noncompliance with the provisions of this permit shall be reported to the Department as prescribed in 6 NYCRR Part 750-1.2(a) and 750-2.
- d) Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit.
- e) If the permittee monitors any pollutant more frequently than required by the permit, using test procedures approved under 40 CFR Part 136 or as specified in this permit, the results of this monitoring shall be included in the calculations and recording of the data on the Discharge Monitoring Reports.
- f) Calculation for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified in this permit.
- g) Unless otherwise specified, all information recorded on the Discharge Monitoring Report shall be based upon measurements and sampling carried out during the most recently completed reporting period.
- h) Any laboratory test or sample analysis required by this permit for which the State Commissioner of Health issues certificates of approval pursuant to section five hundred two of the Public Health Law shall be conducted by a laboratory which has been issued a certificate of approval. Inquiries regarding laboratory certification should be sent to the Environmental Laboratory Accreditation Program, New York State Health Department Center for Laboratories and Research, Division of Environmental Sciences, The Nelson A. Rockefeller Empire State Plaza, Albany, New York 12201.

Industrial Fact Sheet

Summary of Proposed Permit Changes:

The following changes were made to the draft permit as compared to the currently issued permit:

Outfall 001: Since the discharge from Outfall 001 (outlet for flows in excess of the capacity of the oil/water separator) is also monitored at Outfall 01A, monitoring for Tetrachloroethylene and Trichloroethylene have both been removed for this outfall since these two parameters will be monitored at 01A. In addition, neither one of these parameters have been detected at Outfall 001 during the last three year period that was evaluated.

Outfall 01A: Monitoring and limits, for the following parameters, have been removed from the permit since they have not been detected in the effluent from Outfall 01A during the last three year period (and beyond):

Benzene, Toluene, Xylenes, Ethylbenzene, Chloroform, Bromodichloromethane, Naphthalene, n-Butylbenzene, sec-Butylbenzene, Tert-Butylbenzene, Isopropylbenzene, p-Isopropyltoluene, n-Propylbenzene, 1,2,4-Trimethylbenzene, 1,3,5-Trimethylbenzene, 1,1-Dichloroethane, 1,2-(cis)-Dichloroethylene, 1,2-(trans)-Dichloroethylene, Trichloroethylene, 1,1,1-Trichloroethane and Zinc.

Outfall 01A: The monitoring frequency for the remaining parameters for Outfall 01A in the current permit have been reduced, from Monthly to Quarterly. These parameters are either consistently below current permit limits or have rarely been detected. The Tetrachloroethylene limit has been retained since it was last detected in August 2010 (0.0021 mg/l was reported on the August 2010 Discharge Monitoring Report which exceeds the permit limit of 0.002 mg/l).

Outfall 01A: A quarterly total suspended solids limit of 50 mg/l was added to the permit based on best professional judgement due to the nature of the discharge (stormwater runoff).

Outfall 001: The Water Quality based effluent limit for Total Iron was increased from 0.6 mg/l to 2.0 mg/l. This change is the result of a new water quality standard which has become effective since the last permit was issued. The new Water Quality Standard is now in Table 1 in Appendix B.

Best Management Practices plan: As per TOGS 1.2.1 a Best Management Practices (BMP) plan to prevent releases of significant amounts of pollutants to the waters of the State through plant site runoff; spillage and leaks; sludge or waste disposal; and stormwater discharges including, but not limited to, drainage from raw material storage was added to the permit. The initial completed BMP plan shall be submitted, by EDPM + 6 months, to the Regional Water Engineer.

Monitoring Locations page: Updated the Monitoring Locations page of the permit.

Discharge Notifications Act: Added the standard Discharge Notifications Act page to the permit, which requires the permittee to maintain existing identification signs at all outfalls. It also requires the permittee to provide, for public review at a repository accessible to the public, copies of the Discharge Monitoring Reports (DMRs) as required by the permit.

Last Page of Permit: Updated the Recording, Reporting and Additional Monitoring Requirements page of the permit.

Treatment Plant Description

Therm Incorporated focuses on various machining processes. These include grinding, milling, and turning high strength metal parts made of a variety of alloys, along with on site welding, and vacuum heat treating. The facility specializes in the preparation of airfoil components for the aerospace and industrial turbine industry. Finished products are stored inside and main building until shipment by truck from the loading dock. No process wastewater is discharged through surface water outfalls. Outfalls discharge groundwater and stormwater runoff only.

Background Information

The current SPDES permit, SPDES Number NY0244261, for Therm Incorporated became effective on October 1, 1994, and has been administratively renewed in 1998, 2002, 2006 and 2010.

The Department of Environmental Conservation has initiated a modification to the facility's SPDES permit, pursuant to 6 NYCRR Part 750-1.18 & 750-1.19, the priority ranking system, known as New York State's Environmental Benefit Permit Strategy (EBPS). The facility currently has an EBPS score of 97 and a ranking of 86 of 825. In response to the Department's April 20, 2010 Request for Information (RFI), the Therm Incorporated (Permittee) provided a SPDES NY-2C permit application and sampling data for the Therm Incorporated (facility) in September 2010. Sampling requested included Conventionals, Priority Pollutant Metals, Volatiles, Acid Compounds and Base Neutral for Outfalls 001, 01A and 002.

A review of the facility's Discharge Monitoring Reports from September 2007 to September 2010 shows that the following exceedances were reported:

<u>DMR Period</u>	<u>Outfall</u>	<u>Parameter</u>	<u>Permit Limit</u>	<u>Value Reported</u>
August 2010	01A	Tetrachloroethylene	0.002 mg/l	0.0021 mg/l

Discharge Composition

Table 1 in Appendix B presents the existing effluent quality of the facility. The average and maximum concentration and mass reported are based on 3 years (September 2007 to September

2010) of Discharge Monitoring Report (DMR) data submitted by the permittee. Additional pollutants detected in the effluent were reported in the SPDES NY-2C permit application.

Outfall and Receiving Water Information

The facility discharges stormwater and groundwater through Outfalls 001, 01A, 002 and 003 into a drainage ditch tributary to Six Mile Creek. The drainage ditch and Six Mile Creek are classified as Class C by the Department with the following beneficial uses:

Class C - The best usage of Class C waters is fishing. These waters shall be suitable for fish, shellfish, and wildlife propagation and survival. The water quality shall be suitable for primary and secondary contact recreation, although other factors may limit the use for these purposes.

The facility maintains the following outfalls:

Outfall No.	Design Flow Rate (MGD)	Latitude	Longitude	Receiving Water	Water Class	Water Index Number
001	0.58**	42°, 25', 15"	76°, 29', 15"	Drainage Ditch Trib. To Six Mile Creek	C	ONT 66-12-P296-75
01A	0.32**	42°, 25', 15"	76°, 29', 15"	Drainage Ditch Trib. To Six Mile Creek	C	ONT 66-12-P296-75
002	0.83**	42°, 25', 15"	76°, 29', 15"	Drainage Ditch Trib. To Six Mile Creek	C	ONT 66-12-P296-75
003	0.30**	42°, 25', 15"	76°, 29', 15"	Drainage Ditch Trib. To Six Mile Creek	C	ONT 66-12-P296-75

** based on two year, 15 minute storm. See individual outfall tables for actual average and maximum flows for each.

Critical flow and receiving water data is as follows:

Outfall No.	Receiving Water	7Q10 (MGD)	30Q10 (MGD)	Dilution/Mixing	pH (SU)	Temp (°C)	Hardness (mg/l)	Salinity
001	Drainage Ditch Trib. To Six Mile Creek	NA	NA	1:1*	NA	NA	~125	-
01A	Drainage Ditch Trib. To Six Mile Creek	NA	NA	1:1*	NA	NA	~125	-
002	Drainage Ditch Trib. To Six Mile Creek	NA	NA	1:1*	NA	NA	~125	-
003	Drainage Ditch Trib. To Six Mile Creek	NA	NA	1:1*	NA	NA	~125	-

* 1:1 dilution assumed for stormwater discharge.

Critical Flows

The 7Q10 flow was obtained from USGS data. The 30Q10 flow was estimated by (applying a multiplier to the 7Q10 flow.

Dilution/Mixing Zone Analysis

Mixing zone analyses are conducted in accordance with the following documents:

1. EPA T.S.D, entitled “Water Quality Based Toxics Control,” dated March, 1991.
2. EPA Region VIII “Mixing Zones and Dilution Policy”, dated December, 1994.
3. TOGS 1.3.1, entitled “Total Maximum Daily Loads and Water Quality Based Effluent Limits.”

Critical Receiving Water Data

Temperature, pH, hardness and salinity values were obtained from the Rotating Intensive Basin Studies (RIBS) Water Quality Assessment Program.

Effluent Limitations

The NYSDEC followed the Clean Water Act, state and federal regulations, and the Division of Waters Technical and Operational Guidance Series documents for developing the effluent limits. In general, the Clean Water Act requires that the effluent limits for a particular pollutant are the more stringent of either the technology-based or water quality-based limits. A technology-based effluent limit requires a minimum level of treatment for industrial point sources based on currently available treatment technologies. A water quality-based effluent limit (WQBEL) is designed to ensure that the water quality standards of receiving waters are being met. The table detailing the effluent limits is included in the draft permit. More information on the derivation of technology- and water quality-based effluent limits is presented in Appendix B.

Monitoring Requirements

Section 308 of the Clean Water Act and federal regulations 40 CFR 122.44(i) require that monitoring be included in permits to determine compliance with effluent limitations. Additional effluent monitoring may also be required to gather data to determine if effluent limitations may be required. The permittee is responsible for conducting the monitoring and for reporting results on Discharge Monitoring Reports (DMRs) to NYSDEC.

The draft permit contains the monitoring requirements for the facility. Monitoring frequency is based on the minimum sampling necessary to adequately monitor the facility’s performance. For industrial facilities, sampling frequency is based on guidance provided in TOGS 1.2.1.

Other Permit Conditions

Best Management Practices

The permittee is required to implement a Best Management Practices (BMP) plan that prevents, or minimizes the potential for, the release of significant amounts of toxic or hazardous pollutants to state waters. The BMP plan requires annual review by the permittee.

Additional Permit Provisions

The draft permit contains standard regulatory language that is/are required to be in all SPDES permits. These permit provisions are based largely upon 40 CFR 122, subpart C and include requirements pertaining to monitoring, recording, reporting, and compliance responsibilities.

Other Legal Requirements

Discharge Notification Act

In accordance with Discharge Notification Act (ECL 17-0815-a), the permittee is required to post a sign at each point of wastewater discharge to surface waters. The permittee is also required to provide a public repository for DMRs as required by the SPDES permit.

Antidegradation Policy

New York State implements the antidegradation portion of the CWA based upon two documents:

1. Organization and Delegation Memorandum #85-40, entitled "Water Quality Antidegradation Policy," signed by the Commissioner of NYSDEC, dated September 9, 1985.
2. TOGS 1.3.9, entitled "Implementation of the NYSDEC Antidegradation Policy – Great Lakes Basin (Supplement to Antidegradation Policy dated September 9, 1985)."

A SPDES permit cannot be issued that would result in the water quality criteria being violated. The draft permit for the facility contains effluent limits which ensure that the existing beneficial uses of a Class C water will be maintained.

Appendix A

Basis for Effluent Limitations

Statutory and Regulatory Basis for Limits

Sections 101, 301(b), 304, 308, 401, 402, and 405 of the Clean Water Act (CWA) provide the basis for the effluent limitations and other conditions in the draft permit. The NYSDEC evaluates discharges with respect to these sections of the CWA and the relevant SPDES regulations to determine which conditions to include in the draft permit.

In general, the permit writer does a statistical analysis of the monitoring data provided in permittee-submitted discharge monitoring reports (DMRs). Pollutant screening data as required in the Request for Information is also reviewed to determine the presence of additional contaminants that should be considered for inclusion in the permit. The permit writer determines the technology-based limits that must be incorporated into the permit in accordance with federal and state rules, regulations, and technical guidance. The Department then evaluates the water quality expected to result from these controls to determine if any exceedances of water quality standards in the receiving water would result. If there is a reasonable potential for exceedances to occur, water quality-based limits must be included in the permit. The draft permit limits reflect whichever requirements, technology or water quality, are more stringent. The proposed limits are located on Effluent Limits Page[s] of the draft permit. This Appendix describes the technology-based and water quality-based evaluation for the facility.

Technology-Based Evaluation

Section 301(b) and 402 of the CWA require technology-based controls on effluents. This section of the Clean Water Act requires that, by March 31, 1989, all permits contain effluent limitations which: (1) control toxic pollutants and non-conventional pollutants through the use of “best available technology economically achievable” (BAT), and (2) represent “best conventional pollutant control technology” (BCT) for conventional pollutants. In no case may BCT or BAT be less stringent than “best practical control technology currently available” (BPT), which is the minimum level of control required by Section 301(b)(1)(A) of the Clean Water Act. After March 31, 1989, all permits for new sources are required to contain effluent limitations for all categories of point sources which control toxic pollutants through the use of best available demonstrated technology (BADT). BADT is specifically applied through New Source Performance Standards (NSPS).

Water Quality-Based Evaluation

In addition to the technology-based limits previously discussed, the NYSDEC evaluated the discharge to determine compliance with Section 301(b)(1)(C) of the Clean Water Act. This section requires the establishment of limitations in permits necessary to meet water quality standards by July 1, 1977.

The regulations in 40 CFR 122.44(d)(1) implement Section 301(b)(1)(C) of the Clean Water Act. These regulations require that SPDES permits include limits for all pollutants or parameters which “are or may be discharged at a level which will cause, or contribute to an excursion above any State water quality standard, including State narrative criteria for water quality.” The limits must be stringent enough to ensure that water quality standards are met and must be consistent with any available wasteload allocation (WLA).

Water Quality Criteria

Water quality regulations detailed in 6 NYCRR Parts 700-706 and ambient water quality standards and guidance values specified in TOGS 1.1.1 were applied to the facility’s discharge. Specific application of the regulations and standards is detailed in Table 1 of Appendix B.

Reasonable Potential Evaluation

Reasonable potential analysis is the process for determining whether a discharge causes, has the reasonable potential to cause, or contributes to an excursion above New York State water quality criteria for toxic pollutants. When conducting a reasonable potential analysis for each pollutant of concern, factors such as receiving water classification and corresponding water quality criteria and guidance values, pollutant concentration in the effluent, dilution available in the receiving water, background concentrations and additional upstream and downstream dischargers containing the pollutant of concern are used to quantify the receiving water quality. If the expected concentration of the pollutant of concern in the receiving water exceeds the ambient water quality criteria or guidance value then there is reasonable potential that the discharge may cause or contribute to a violation of the water quality standard, and a water quality-based effluent limit or load allocation for the pollutant is required. Calculations performed specifically for the effluent of this facility can be found at the end of this Appendix.

Procedure for Deriving Water Quality-Based Effluent Limits (WQBELs)

The TMDL process is a water quality based approach to implementing water quality standards. It is applied to an entire watershed or drainage basin whenever possible, but may also be applied to waterbody segments with individual or multiple pollutant sources. The TMDL analysis is carried out separately for each pollutant. It allows for the consideration of all sources of the pollutant including point sources, non-point sources, atmospheric deposition and natural background. Dependant on the complexity of the issue and the amount of data available, the analysis can be relatively simple such as a desk-top, mass-balance calculation or it can be exacting and detailed by using complex, multidimensional water quality models. The TMDL process serves a dual function in the permit development process. It provides the basis for the reasonable potential analysis. If the reasonable potential analysis indicates that the pollutant of concern has the potential to cause or contribute to an excursion of water quality standards, the TMDL process is then used to determine the WQBELs for all sources of the pollutant to assure compliance with the standards.

Appendix B

Individual Outfall Data Summaries and Permit Limit Development

Existing Effluent Quality and Technology Based Effluent Limits (TBEL)

Technology Based Effluent Limit (TBEL) is set based upon an evaluation of Best Available Technology Economically Achievable (BAT), Best Conventional Pollutant Control Technology (BCT), Best Practicable Technology Currently Available (BPT), and Best Professional Judgment (BPJ). BPJ limits may be set using any reasonable method that takes into consideration the criteria set forth in 40 CFR 125.3.

For the Existing Effluent Quality, the statistical methods utilized are in accordance with TOGS 1.2.1 and the USEPA, Office of Water, Technical Support Document For Water Quality-based Toxics Control, March 1991, Appendix E. Statistical calculations were not performed for parameters with insufficient data. Generally, ten or more data points are needed to calculate percentiles (See TOGS 1.2.1 Appendix D). Two or more data points are necessary to calculate an average and a maximum. Non-detects were excluded in the statistical calculations.

Monitoring data collected during the following time period of September 2007 to September 2010 was used to calculate statistics and these data were taken from the SPDES Information System (SIS) from data provided on monthly DMRs.

Water Quality Based Effluent Limits (WQBEL)

Ambient Water Quality Criteria (AWQC) and guidance values specified in “Water Quality Regulations” New York State Codes, Rules and Regulations Title 6, Chapter X, Parts 700-705 and TOGS 1.1.1 were applied to the following pollutants identified in the facilities discharge. Water Quality Based Effluent Limits (WQBEL's) were calculated by applying the TMDL process for each pollutant.

TABLE 1

(1) General Permittee Data:

Permit Number	Permittee Name	Facility Name	Location (C, T, V)	County	Industrial Code	Major/Sub Basin
NY0244261	Therm Inc.	Therm Inc.	Ithaca (C)	Tompkins	9511	07-05

(2) Summary of Final Outfall Flow Rate(s) and Receiving Water Data:

Outfall Information					Receiving Water Information								
Outfall #	Latitude	Longitude	Flow Rate (MGD)		Name	Class	Water Index Number	For use by WQ Engineer - Critical Data					
	°, ', "	°, ', "	Average	Maximum or Design				7Q10 (MGD)	30Q10 (MGD)	Dilution/Mixing	pH (SU)	Temp (°F)	Hardness (mg/l)
001	42°, 25', 15"	76°, 29', 15"	0.02	0.58**	Drainage Ditch Trib. To Six Mile Creek	C	ONT 66-12-P296-75	NA	NA	~1:1*	NA	NA	~125
01A	42°, 25', 15"	76°, 29', 15"	0	0.32**	Drainage Ditch Trib. To Six Mile Creek	C	ONT 66-12-P296-75	NA	NA	~1:1*	NA	NA	~125
002	42°, 25', 15"	76°, 29', 15"	0.006	0.83**	Drainage Ditch Trib. To Six Mile Creek	C	ONT 66-12-P296-75	NA	NA	~1:1*	NA	NA	~125
003	42°, 25', 15"	76°, 29', 15"	0.003	0.30**	Drainage Ditch Trib. To Six Mile Creek	C	ONT 66-12-P296-75	NA	NA	~1:1*	NA	NA	~125

* 1:1 dilution assumed for stormwater discharge.

** based on two year, 15 minute storm (according to NY-2C SPDES application dated September 2010). See individual outfall tables for actual average and maximum flows for each.

(3) Individual Outfall Data Summaries and Permit Limit Development:

Outfall	001
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Source(s) of Wastewater	Stormwater and groundwater infiltration (Oil/Water Separator by-pass)
Existing Wastewater Treatment Facilities	
EPA Point Source Category & Production Rate	NA

Effluent Parameter (Units) (concentration units - mg/l, ug/l or ng/l; mass units - lbs/d or g/d)	Existing Effluent Quality				Technology Based Effluent Limit					Water Quality Based Effluent Limit				Permit Basis (T or WQ)
	Concentration		Mass		conc.	Mass	Type	PQL conc.	Basis	AWQC conc.	Effluent		Type	
	Avg/Max	95%/99%	Avg/Max	95%/99%							conc.	mass		
WET TESTING					NA					NO				
Flow Rate, units = gpd	Average	5,857	Maximum	18,783	Monitor			NA	R					T
pH (su)	Minimum	-	Maximum	-	None			Range	BPJ	6.5-8.5	NA			T
Tetrachloroethylene, mg/l	<0.001	<0.001			None				BPJ	0.001	TBEL ok			T
Trichloroethylene, mg/l	<0.001	<0.001			None				BPJ	0.04	TBEL ok			T
Chromium, Total – mg/l	<0.02	<0.02			None				BPJ	0.54	TBEL ok			T

(3) Individual Outfall Data Summaries and Permit Limit Development:

Outfall	01A
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Source(s) of Wastewater	Storm water and groundwater infiltration through Oil/Water Separator.
Existing Wastewater Treatment Facilities	Oil/Water Separator
EPA Point Source Category & Production Rate	-

Effluent Parameter (Units) (concentration units - mg/l, ug/l or ng/l; mass units - lbs/d or g/d)	Existing Effluent Quality				Technology Based Effluent Limit					Water Quality Based Effluent Limit				Permit Basis (T or WQ)	
	concentration		mass		conc.	Mass	Type	PQL conc.	Basis	AWQC conc.	Effluent		Type		
	Avg/Max	95%/99%	Avg/Max	95%/99%							conc.	conc.	mass	Type	
WET TESTING					NA					NO					
Flow Rate, units = MGD	Average	5,857	Maximum	5,857	Monitor			NA	BPJ						T
pH (su)	Minimum	6.5	Maximum	8.5	6.0 – 9.0		Range		BPJ	6.5-8.5	TBEL ok				T
Benzene – mg/l	<0.001	<0.001			None		DM		BPJ	0.01	TBEL ok				T
Toluene – mg/l	<0.001	<0.001			None		DM		BPJ	0.1	TBEL ok				T
Xylenes, Total – mg/l	<0.001	<0.001			None		DM		BPJ	0.65	TBEL ok				T
Ethylbenzene – mg/l	<0.001	<0.001			None		DM		BPJ	0.17	TBEL ok				T
Chloroform – mg/l	<0.001	<0.001			None		DM		BPJ	Class A only	TBEL ok				T
Bromodichloromethane – mg/l	<0.001	<0.001			None		DM		BPJ	Class A only	TBEL ok				T
Tetrachloroethylene – mg/l	0.001	0.0021			0.002		DM		R (WQ)	0.001	0.002				WQ
Naphthalene – mg/l	<0.001	<0.001			None		DM		BPJ	0.13	TBEL ok				T

Effluent Parameter (Units) (concentration units - mg/l, ug/l or ng/l; mass units - lbs/d or g/d)	Existing Effluent Quality				Technology Based Effluent Limit						Water Quality Based Effluent Limit				Permit Basis (T or WQ)
	concentration		mass		conc.	Mass	Type	PQL	Basis	AWQC	Effluent				
	Avg/Max	95%/99%	Avg/Max	95%/99%							conc.	conc.	mass	Type	
n-Butylbenzene – mg/l	<0.001	<0.001			None		DM		BPJ	Class A only	TBEL ok			T	
sec-Butylbenzene – mg/l	<0.001	<0.001			None		DM		BPJ	Class A only	TBEL ok			T	
Tert-Butylbenzene – mg/l	<0.001	<0.001			None		DM		BPJ	Class A only	TBEL ok			T	
Isopropylbenzene – mg/l	<0.001	<0.001			None		DM		BPJ	0.026	TBEL ok			T	
p-Isopropyltoluene – mg/l	<0.001	<0.001			None		DM		BPJ	Class A only	TBEL ok			T	
n-Propylbenzene – mg/l	<0.001	<0.001			None		DM		BPJ	Class A only	TBEL ok			T	
1,2,4-Trimethylbenzene – mg/l	<0.001	<0.001			None		DM		BPJ	0.33	TBEL ok			T	
1,3,5-Trimethylbenzene – mg/l	<0.001	<0.001			None		DM		BPJ	Class A only	TBEL ok			T	
1,1-Dichloroethane – mg/l	<0.001	<0.001			None		DM		BPJ	Class A only	TBEL ok			T	
1,2-(cis)-Dichloroethylene – mg/l	<0.001	<0.001			None		DM		BPJ	Class A only	TBEL ok			T	
1,2-(trans)-Dichloroethylene – mg/l	<0.001	<0.001			None		DM		BPJ	Class A only	TBEL ok			T	
Trichloroethylene – mg/l	<0.001	<0.001			None		DM		BPJ	0.04	TBEL ok			T	
1,1,1-Trichloroethane – mg/l	<0.001	<0.001			None		DM		BPJ	Class A only	TBEL ok			T	
Oil & Grease – mg/l	5.48	10			15		DM		R	Narr std.	TBEL ok			T	
Copper, Total – mg/l	0.021	0.05			0.088		DM		R (WQ)	0.036	0.088			WQ	

Effluent Parameter (Units) (concentration units - mg/l, ug/l or ng/l; mass units - lbs/d or g/d)	Existing Effluent Quality				Technology Based Effluent Limit					Water Quality Based Effluent Limit				Permit Basis (T or WQ)
	concentration		mass		conc.	Mass	Type	PQL conc.	Basis	AWQC conc.	Effluent		Type	
	Avg/Max	95%/99%	Avg/Max	95%/99%							conc.	mass		
Copper, Dissolved – mg/l	0.02	0.04			None		DM		BPJ	0.013	TBEL ok			T
Iron, Total - mg/l	0.18	0.61*			0.6		DM		R (WQ)	1.0	2.0			WQ
Zinc, Total – mg/l	0.021	0.05			None		DM		BPJ	0.37	TBEL ok			T

*from RFI sample collected on 8/10/10.

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(3) Individual Outfall Data Summaries and Permit Limit Development:

Outfall	002
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Source(s) of Wastewater	Stormwater
Existing Wastewater Treatment Facilities	
EPA Point Source Category & Production Rate	

Effluent Parameter (Units) (concentration units - mg/l, ug/l or ng/l; mass units - lbs/d or g/d)	Existing Effluent Quality				Technology Based Effluent Limit					Water Quality Based Effluent Limit				Permit Basis (T or WQ)
	concentration		mass		conc.	mass	Type	PQL conc.	Basis	AWQC conc.	Effluent		Type	
	Avg/Max	95%/99%	Avg/Max	95%/99%							conc.	conc.	mass	Type
WET TESTING					NA					NO				
Flow Rate, units = MGD	Average	-	Maximum	-	-			NA	BPJ					
pH (su)	Minimum	-	Maximum	-	-			Range	BPJ	6.5-8.5	NA			
1,2-(cis)-Dichloroethylene – mg/l	<0.001	<0.001			None				BPJ	Class A only	TBEL ok			T
1,2-(trans)-Dichloroethylene – mg/l	<0.001	<0.001			None				BPJ	Class A only	TBEL ok			T
Tetrachloroethylene – mg/l	<0.001	<0.001			0.005				R	0.001	0.002			WQ
Iron, Total (RFI sample), mg/l	0.61				None				BPJ	1.0	2.0			T
Zinc, mg/l (RFI sample dated 8/10/10).	0.03				None				BPJ	0.37	NA			T

(3) Individual Outfall Data Summaries and Permit Limit Development:

Outfall	003
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Source(s) of Wastewater	Stormwater (from groundwater infiltration/footing drains)
Existing Wastewater Treatment Facilities	
EPA Point Source Category & Production Rate	
NO MONITORING REQUIRED	

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