Resolution # 17-134

RESOLUTION AUTHORIZING EXECUTION OF AN INDUSTRIAL SEWER CONNECTION PERMIT MODIFICATION TO: Arconic - Howmet Castings & Services, Inc. Block 10101 / Lots 1 & 4 Township of Rockaway, New Jersey

WHEREAS, the Rockaway Valley Regional Sewerage Authority (hereinafter "the Authority") is authorized by the Sewerage Authorities Law [N.J.S.A. 40:14A-7(11)] to make and enforce rules and regulations for the management and regulation of its business and affairs and/or the use, maintenance, and operation of the sewerage system and any other of its properties and to amend the same; and

WHEREAS, the Authority is a Delegated Local Agency of the New Jersey Department of Environmental Protection and administers an industrial pretreatment program within the service area of the Authority; and

WHEREAS, in accordance with the regulations governing industrial pretreatment programs established at N.J.S.A. 7:14A-1 et. seq., the Authority is required to issue permits and renew permits to industrial discharges within the RVRSA that discharge process wastewater to the Authority's facility; and

WHEREAS, in compliance with the regulations contained at N.J.A.C. 7:14A-15.10, public notice of the issuance of a draft Industrial Sewer Connection Permit to Arconic – Howmet Castings & Services, Inc. was published in the Daily Record on September 9, 2017, and a thirty (30) day public comment period commenced from the date of publication until October 8, 2017, wherein no comments were received.

NOW THEREFORE, BE IT RESOLVED, by the Rockaway Valley Regional Sewerage Authority as follows:

 The Executive Director, JoAnn Mondsini, is hereby authorized to execute an Industrial Sewer Connection Permit modification in accordance with the terms and conditions of a form of Industrial Sewer Connection Permit (ISCP), SIC Codes 3341 and 3369 dated November 10, 2017 marked Schedule "A" attached hereto and a part hereof, a copy of which is also, on file at the offices of RVRSA, to **Arconic – Howmet Castings & Services, Inc.**, subject to compliance with any permit condition(s) which must be satisfied prior to issuance of this permit renewal, if any; and subject to compliance with

all remaining engineering requirements, if any.

2. This approval is subject to the payment of the appropriate RVRSA pretreatment

annual permit fee.

3. This ISCP is subjected to a flow limitation not to exceed 73,000 gallons per day.

monthly average.

I hereby certify that this Resolution was adopted at a meeting of the Rockaway Valley Regional

Authority held on November 9, 2017.

On motion of Glenn Corbett

Seconded by Joseph Lowell

And a Roll Call Vote as Follows:

Yeas: (7) Andes, Cegelka, Corbett, Laverty, Lowell, Recchia, Rossi

Nays: (0) None

Abstain: (1) Vincitore

Absent: (2) Guadagno and Schorno

Mary Roman

Assistant Board Secretary



FACT SHEET Arconic: Howmet Castings & Services Inc.

This fact sheet sets forth the principal facts and the significant factual, legal, and policy considerations examined during preparation of the draft permit.

PERMIT ACTION:

Modification of Industrial Sewer Connection Permit

PERMITTEE NAME AND ADDRESS:

Arconic: Howmet Castings & Services Inc.

9 Roy Street Dover, NJ 07801

FACILITY NAME AND ADDRESS:

Arconic: Howmet Castings & Services Inc.

9 Rov Street

Rockaway Township, NJ

FACILITY CONTACT INFORMATION:

David Knapp

Manager, Environmental, Health and Safety

Phone No.: (973) 328-8522 Email: david.knapp2@alcoa.com

RECEIVING LOCAL AGENCY:

Rockaway Valley Regional Sewerage Authority

RECEIVING COLLECTION SYSTEM:

Rockaway Valley Regional Sewerage Authority (main-trunk line, metered at Meter Chamber RT-3)

DESCRIPTION OF FACILITY OPERATIONS:

The primary activity at this facility is precision investment castings (foundry) and production of alloys from elemental metals (SIC Codes: 3341 and 3369). The "Alloy" facility produces superalloys for use at various casting facilities. The "Castings" facility re-melts alloys into ceramic molds formed by wax patterns. The castings are then cleaned and shipped out. This facility is subject to 40 CFR 433 – Metal Finishing Point Source Category, Subpart A – Metal Finishing Subcategory and 40 CFR 433.15 – Pretreatment Standards for Existing Sources (PSES). Additional process/activities at the facility include: Castings Division: wax pattern, ceramic shell, shell wrap, steam autoclave, vacuum induction melting, ceramic shell removal, gate removal, metal finishing. Quality Control Division: FPI, X-Ray, etching, packing. Alloy Division: Ingot processing, refractory processing, vacuum induction melting, and air induction melting.

Alcoa-Howmet Castings and Alloy generates **73,000** (permitted) gallons per day (monthly average) of combined wastewater from its two (2) castings plants, alloy plant, wastewater treatment plant and offices.

The on-site wastewater treatment plant and pretreatment devices consist of: filtration system, oil/grease separation, grease trap, silver recovery/removal system, spill protection, settling weir

Fact Sheet Arconic - Howmet Castings Page 2 of 11



system, coalesce equipment, chemical precipitation neutralization, pH correction, and sedimentation.

DESCRIPTION OF DISCHARGE LOCATION(S) (see attached Figure 1):

Name:

DSN-01 [Existing discharge point]

Latitude:

40° 52' 54.95' N

Longitude:

74° 31' 40.65' W

Description: HDC-1 Manhole (Outfall DSN-01)

Name:

DSN-02 [New proposed discharge point]

Latitude:

40° 52' 49' N

Longitude:

74° 31' 51' W **Description:** HDC-2 Manhole (Outfall DSN-02)

SUMMARY OF PERMIT CONDITIONS (see attached Table 1):

The following pollutants are regulated: in addition to flow, CBOD5, BOD5, COD, suspended solids (TSS), dissolved solids (TDS), pH, oil & grease, phosphorus, NH3-N, arsenic (As), beryllium (Be), cadmium (Cd), chromium (Cr), cobalt (Co), copper (Cu), lead (Pb), mercury (Hg), molybdenum (Mo), nickel (Ni), silver (Ag), zinc (Zn), phenols, cyanide, and total toxic organics (TTO).

The basis for the limitations established is summarized in the local limits evaluation report entitled RVRSA Local Limit Study, prepared by Kleinfelder, dated November 2014, last revised December 2016, including April 14, 2017 Addendum; approved by the NJDEP on April 24, 2017, and approved by the RVRSA board on August 10, 2017 and the proposed amendments approved by the RVRSA board on October 12, 2017.

Below is a summary of key aspects of this permit modification application.

- 1. Flow: The flow from Howmet Castings (Howmet) is proposed to increase from 72,000 gpd (monthly average) to 73,000 gpd (monthly average). In a letter dated June 16, 2017, Howmet requested an 8,000 gpd increase in gallonage, to a proposed permitted limit of 80,000 gpd. RVRSA determined that Howmet did not demonstrate the need for more than a monthly average flow of 73,000 gpd, and therefore RVRSA personnel recommends an increase of only 1,000 gpd. The prior twelve (12) months of flow show an average flow of 56,696 gpd and a maximum flow of 78,162 gpd. The additional 1,000 gpd being recommended by RVRSA personnel is to allow for the addition of a new line for the discharge of non-contact cooling water as described below.
- 2. Non-Contact Cooling Water Discharge (additional flows): Due to future plant improvements, increased production, and the NJDEP no longer permitting their noncontact cooling water discharge into storm drains, therefore, Howmet requested to tie-in additional flows and processes into the sewer system. These processes consist mainly of non-contact cooling water discharges from three (3) cooling towers, needed to supply cooling water to furnaces. RVRSA recommends granting an



increase in flow from 72,000 gpd (monthly average) to 73,000 gpd (monthly average).

- Introduction of Second Sampling Location (DSN 02): The 2,750 gpd of non-contact cooling water from the Alloy Division will not be entering the current DSN-01 sampling location and therefore, an additional sampling point (DSN-02) is being added to permit and regulate the non-contact cooling water discharge from the Alloy buildings.
- 4. <u>Non-Contact Cooling Water Discharge (emergency discharge only)</u>: Howmet is also requesting approval to discharge up to 120,000 gpd to the RVRSA in an emergency situation (power outage when the existing cooling systems would not be operable). During the emergency situation, potable water will be used to cool the process. In the event of an emergency, Howmet estimates that approximately 76,000 gallons (from castings buildings) will flow to the DSN-01 discharge point, and 44,000 gallons (from alloy buildings) will flow to the DSN-02 discharge point.
- 5. <u>Total Suspended Solids (TSS) Parameter:</u> Due to occasional historic exceedances of this parameter, RVRSA has granted a higher limit for TSS from its unallocated reserve (750 mg/L rather than 500 mg/L).
- 6. <u>Parameters of Concern:</u> During the previous and current permit cycle the following parameters were exceeded on occasion: NH₃-N, TSS, pH, nickel, and silver.
- 7. Other Parameters: The following parameters limitations have been updated or have been added as per the local limits study dated, dated November 2014, last revised December 2016, and including the April 14, 2017 Addendum; approved by the NJDEP on April 24, 2017, and approved by the RVRSA board on August 10, 2017 and the proposed amendments approved by the RVRSA board on October 12, 2017. Limitation updated: CBOD₅, BOD₅, total suspended solids (TSS), ammonianitrogen (NH₃-N), arsenic, cadmium, chromium, copper, cyanide, lead, mercury, nickel, and zinc. Parameters added: molybdenum
- 8. <u>Emergency Discharge Plan:</u> Section 27: Emergency Discharge Limitation Plan, has been added to this permit modification request.

VARIANCES OR ALTERNATIVES TO PERMIT CONDITIONS:

N/A

REGULATIONS APPLICABLE TO THIS PERMIT ACTION:

This permit is issued in accordance with N.J.S.A 58:10A-6f, N.J.A.C. 7:14A-19.8, and 40 CFR Part 403.8. Requirements for the contents of this Fact Sheet are in accordance with N.J.A.C. 7:14A-15.8.



This facility is also subject to 40 CFR 433 – Metal Finishing Point Source Category, Subpart A – Metal Finishing Subcategory and 40 CFR 433.15 – Pretreatment Standards for Existing Sources (PSES).

INDUSTRIAL PRETREATMENT PROGRAM CONTACT PERSON:

Additional information concerning this permit may be obtained from Natalie Pisarcik, RVRSA IPP Coordinator, at 973-263-1555 ext. 213.

TABLE - 1: DISCHARGE LIMITATIONS

ARCONIC: HOWMET CASTINGS

Sample Location: DSN - 01 (HDC - 1 Manhole)

Parameter	Daily Max. Limit	Mo. Avg. Limit	Sample Freq.	Sample-Type
Flow (3)	Report	69,250 GPD	Continuous	Metered
BOD ₅	Report	Report	Monthly	Comp.
CBOD ₅	500 mg/L (1) (2)	Report	Monthly	Comp.
TSS	750 mg/L (2) (9)	Report	Monthly	Comp.
TDS	Report	Report	Monthly	Comp.
рH	5.5-9.5 S.U. (1) (7)	N/À	Monthly	Grab
O&G	100 mg/L (1)	Report	Monthly	Grab
Phosphorus	Report	Report	Monthly	Comp.
NH ₃ -N	80 mg/L (1) (2)	Report	Monthly	Comp.
Chromium (Cr)	1.3 mg/L (1)	0.9 mg/L (4)	Monthly	Comp.
Cobalt (Co) (8)	Report	Report	Monthly	Comp.
Copper (Cu)	1.7 mg/L (4)	1.1 mg/L (4)	Monthly	Comp.
Nickel (Ni)	0.8 mg/L (1)	0.8 mg/L (1)	Monthly	Comp.
Silver (Ag)	0.2 mg/L (4)	0.1 mg/L (4)	Monthly	Comp.
Zinc (Zn)	1.3 mg/L (4)	0.8 mg/L (4)	Monthly	Comp.
TTO	1.09 mg/L (4) (5) (6)	Report	Semi-Ánnually	C&Ġ
Arsenic (As)	0.2 mg/L (1)	Report	Semi-Annually	Comp.
Cadmium (Cd)	0.4 mg/L (4)	0.1 mg/L (4)	Semi-Annually	Comp.
Lead (Pb)	0.4 mg/L (4)	0.2 mg/L (4)	Semi-Annually	Comp.
Molybdenum (Mo	o) 0.3 mg/L (1)	Report	Semi-Annually	Comp.
Cyanide	0.5 mg/L (1)	0.3 mg/L (4)	Semi-Annually	Grab
Phenols	Report	Report	Semi-Annually	Grab
Mercury (Hg)	0.06 mg/L _. (1)	Report	Annually	Comp.

Notes:

(1) Discharge limits are based upon the RVRSA local limits.



- CBOD₅ or TSS concentration exceeding 250 mg/L and NH₃-N concentration exceeding 40 mg/L are subject to the Surcharge for Wastewaters of Excessive Strength as per Section 8B of this ISCP. Any discharge over the CBOD₅ limit of 500 mg/L, a TSS limit of 750 mg/L, or the NH₃-N of 80 mg/L will be considered a permit violation and subject to applicable enforcement actions.
- (3) Monthly average of flow is based on a COMBINED (Process and Sanitary) wastewater flow.
- The discharge limits are based upon the Federal Categorical Standards for Metal Finishing Industries, 40 CFR § 433.15 (PSES). A Combined Waste Stream Formula (CWSF) was used to account for the dilution factor (see Table 2 and Table 3).
- (5) The Total Toxic Organics (TTO) list is attached.
- (6) A NON-USE Certification form is attached. This is allowed in lieu of TTO Sampling, pursuant to 40 CFR § 433 regulations. The Permittee may use this form for volatiles, acids, base/neutrals, organics and/or pesticides/PCBs sampling. The sample type is Composite and Grab.
- (7) The pH sample shall be analyzed by a NJDEP certified lab, within 15 minutes of collection of the sample.
- (8) Cobalt is included because of its use in the manufacturing process at Howmet Castings.
- (9) RVRSA has granted a higher limit for TSS from its unallocated reserve (750 mg/L, rather than 500 mg/L), based on historical exceedances of this parameter.

Additional Notes:

The permittee shall notify the RVRSA, at a minimum 10 days in advance, of any Changed Condition, including (+/-) 20% change in the production, operations, reported average water use, discharge streams, discharge volume or discharge quality. The facility is also required to notify regarding introduction of any new waste stream or new pollutant previously not identified.

The Self-Monitoring Report (SMR) is due and shall be received by the RVRSA office on or before the 21st day of the month following the sampling month, or next business day (if date shall fall on a weekend and/or holiday). If no pollutant sample is collected or analyzed during a month, then the monthly report shall include at least flow data.

Fact Sheet Arconic – Howmet Castings Page 6 of 11



Parameters shall be tested according to monitoring frequency and submitted in accordance to the SMR along with copies of analytical results and the chain of custody. All SMR's submitted must comply and contain the signatory requirement as required under 40 CFR § 403.6 (a)(2)(ii) and it must be signed by a responsible corporate officer as required under 40 CFR § 430.12(I).

Composite samples shall be collected over a twenty-four (24) hour period; programmed to sample every 15 minutes, unless otherwise noted.

"Daily Maximum" limits equals "Monthly Average" limits if only one sampling event is performed during the month, unless otherwise noted.

The "Quarterly" sample period shall correspond to the January-March, April-June, July-September, and October-December quarters.

The "Semi-Annually" sample period shall correspond to the January – June calendar year and the July – December calendar year.

The "Annually" sample period shall correspond to the January – December calendar year.

Copies of manifests for process wastewater trucked offsite for disposal shall be made available for review by our offices.



TABLE - 2: DISCHARGE LIMITATIONS

ARCONIC: HOWMET CASTINGS

Sample Location: DSN – 02 (Alloy Building Discharge)

Parameter	Daily Max. Limit	Mo. Avg. Limit	Sample Freq.	Sample-Type
Flow (3)	Report	3,750 GPD	Continuous	Metered
CBOD ₅	500 mg/L (1) (2)	Report	Quarterly (5)	Grab
TSS	500 mg/L (1) (2)	Report	Quarterly	Grab
TDS	Report	Report	Quarterly	Grab
pН	5.5-9.5 S.U. (1) (4)	N/Á	Quarterly	Grab
O&G	100 mg/L (1)	Report	Quarterly	Grab
Phosphorus	Report	Report	Quarterly	Grab
NH ₃ -N	80 mg/L (1) (2)	Report	Quarterly	Grab
Arsenic (As)	0.2 mg/L (1)	Report	Quarterly	Grab
Cadmium (Cd)	0.4 mg/L (1)	Report	Quarterly	Grab
Chromium (Cr)	1.3 mg/L (1)	Report	Quarterly	Grab
Copper (Cu)	1.7 mg/L ₍₁₎	Report	Quarterly	Grab
Lead (Pb)	1.0 mg/L (1)	Report	Quarterly	Grab
Mercury (Hg)	0.06 mg/L (1)	Report	Quarterly	Grab
Molybdenum (Mo)	0.3 mg/L (1)	Report	Quarterly	Grab
Nickel (Ni)	0.8 mg/L _. (1)	Report	Quarterly	Grab
Zinc (Zn)	2.1 mg/L (1)	Report	Quarterly	Grab
Cyanide	0.5 mg/L (1)	Report	Quarterly	Grab
Phenols	Report	Report	Quarterly	Grab

Notes:

(1) Discharge limits are based upon the RVRSA local limits.



- CBOD₅ or TSS concentration exceeding 250 mg/L and NH₃-N concentration exceeding 40 mg/L are subject to the Surcharge for Wastewaters of Excessive Strength as per Section 8B of this ISCP. Any discharge over the CBOD₅ and/or TSS limit of 500 mg/L or the NH₃-N of 80 mg/L will be considered a permit violation and subject to applicable enforcement actions.
- (3) Monthly average of flow from Alloy Building: 2,750 gallons from cooling towers and 1,000 gallons from sanitary.
- (4) The pH sample shall be analyzed by a NJDEP certified lab, within 15 minutes of collection of the sample.
- (5) Quarterly sampling shall occur during the following months:
 - 2017: January, April, July, October
 - 2018: February, May, August, November
 - 2019: March, June, September, December
 - 2020: January, April, July, October

Additional Notes:

The permittee shall notify the RVRSA, at a minimum 10 days in advance, of any Changed Condition, including (+/-) 20% change in the production, operations, reported average water use, discharge streams, discharge volume or discharge quality. The facility is also required to notify regarding introduction of any new waste stream or new pollutant previously not identified.

The Self-Monitoring Report (SMR) is due and shall be received by the RVRSA office on or before the 21st day of the month following the sampling month, or next business day (if date shall fall on a weekend and/or holiday). If no pollutant sample is collected or analyzed during a month, then the monthly report shall include at least flow data.

Parameters shall be tested according to monitoring frequency and submitted in accordance to the SMR along with copies of analytical results and the chain of custody. All SMR's submitted must comply and contain the signatory requirement as required under 40 CFR § 403.6 (a)(2)(ii) and it must be signed by a responsible corporate officer as required under 40 CFR § 430.12(I).

"Daily Maximum" limits equals "Monthly Average" limits if only one sampling event is performed during the month, unless otherwise noted.

The "Quarterly" sample period shall correspond as follows:

• 2017: January, April, July, October



- 2018: February, May, August, November
- 2019: March, June, September, December
- 2020: January, April, July, October

Copies of manifests for process wastewater trucked offsite for disposal shall be made available for review by our offices

FIGURE 1: Facility Sampling Location

ARCONIC - HOWMET CASTINGS

SAMPLING LOCATION: (Discharge location: DSN - 01) HDC - 1 Manhole





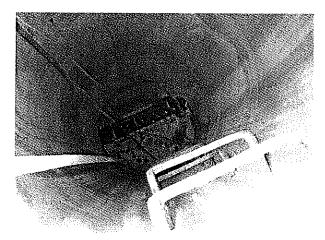




FIGURE 2: Facility Sampling Location

ARCONIC - HOWMET CASTINGS

SAMPLING LOCATION: (Discharge location: DSN - 02)
Alloy Building Manhole

Fact Sheet Arconic – Howmet Castings Page 11 of 11



