

DOCKET NO. D-1979-026-3

DELAWARE RIVER BASIN COMMISSION

**ArcelorMittal Plate, LLC
Conshohocken Industrial Wastewater Treatment Plant
Plymouth Township, Montgomery County, Pennsylvania**

PROCEEDINGS

This docket is issued in response to an Application submitted to the Delaware River Basin Commission (DRBC or Commission) by ArcelorMittal Plate LLC (docket holder), on January 3, 2017 (Application) for renewal of the docket holder's existing industrial wastewater treatment plant (IWTP) and its discharge. The Pennsylvania Department of Environmental Protection (PADEP) issued National Pollutant Discharge Elimination System (NPDES) Permit No. PA0050326 for the IWTP discharge on June 8, 2012.

The Application was reviewed for approval under Section 3.8 of the *Delaware River Basin Compact*. The Montgomery County Planning Commission has been notified of pending action. A public hearing on this project was held by the DRBC on August 16, 2017.

A. DESCRIPTION

- 1. Purpose.** The purpose of this docket is to renew approval of the docket holder's existing 1.2 million gallon per day (mgd) Conshohocken IWTP and its discharge.
- 2. Location.** The docket holder's Conshohocken steel production and finishing facility is located between Conshohocken Road and the Schuylkill River, just south of a railroad bridge owned by the docket holder that spans the Schuylkill River, in Plymouth Township, Montgomery County, Pennsylvania. The IWTP will continue to discharge to the Schuylkill River at River Mile 92.47 – 21.5 (Delaware River – Schuylkill River).

The project outfall is located in the Schuylkill River Watershed as follows:

OUTFALL NO.	LATITUDE (N)	LONGITUDE (W)
001	40° 05' 22"	75° 19' 15"

- 3. Area Served.** The docket holder's IWTP will continue to receive industrial wastewater and cooling water flows from the steel production and finishing operations at the ArcelorMittal Plate Conshohocken facility located in Plymouth Township, Montgomery County, Pennsylvania.

For the purpose of defining the Area Served, Section B (Type of Discharge) and D (Service Area) of the docket holder’s Application are incorporated herein by reference, to the extent consistent with all other conditions contained in the DECISION Section of this docket.

4. Physical features.

a. Design criteria. The docket holder’s facility produces finished carbon, alloy, and stainless steel plates from slab stock at a hot rolling mill and heat production facilities located on-site. The 1.2 mgd IWTP treats process industrial wastewater and contact and non-contact cooling water used for slab surface descaling and non-contact cooling at the hot rolling mill, and contact cooling at the heat production facilities. The cooling water is combined with process water prior to treatment. The treatment processes include 1) oil skimming of the top of a concentrator; 2) coagulant (ferric chloride) and flocculent (cationic polymer) addition for settling; 3) decanting off the top of the clarifier; and 4) sludge conditioning through lime slurry addition and sludge dewatering through a filter press. Filtrate from the sludge filtering is returned to the influent stream.

b. Facilities. The existing IWTP facilities consist of a river pump house, a 125-foot diameter clarifier which receives both Schuylkill River water and process wastewater, a recirculation pump house, an oil/water separator, a scale pit, a sludge lagoon and ancillary equipment.

The project facilities are outside the 100-year floodplain.

Wasted sludge will continue to be hauled off-site by a licensed hauler for disposal at a state approved facility.

c. Water withdrawals. Water withdrawn for the use of process water and contact cooling and non-contact cooling is from an on-site water withdrawal owned and operated by the docket holder. The withdrawal was approved by DRBC Docket No. D-2009-039-1 on July 14, 2010.

d. NPDES Permit / DRBC Docket. NPDES Permit No. PA0050326 was issued by the PADEP on June 8, 2012 and includes final effluent limitations for the project discharge of 1.2 mgd to surface waters classified by the PADEP as Warm Water Fishery (WWF). The following average monthly effluent limits are among those listed in the NPDES permit and meet or are more stringent than the effluent requirements of the DRBC.

EFFLUENT TABLE A-1: DRBC Parameters Included in NPDES Permit

OUTFALL 001 (Schuylkill River)		
PARAMETER	LIMIT	MONITORING
pH (Standard Units)	6 to 9 at all times	As required by NPDES Permit

OUTFALL 001 (Schuylkill River)		
PARAMETER	LIMIT	MONITORING
Total Suspended Solids	30 mg/l	As required by NPDES Permit
Color	Monitor & Report	As required by NPDES Permit
Total Dissolved Solids *	Monitor & Report	As required by NPDES Permit
Temperature	110 ° F (Max)	As required by NPDES Permit

* See EFFLUENT Table A-2 below and Condition C.II.s. in the Decision section

EFFLUENT TABLE A-2: DRBC Parameters Not Included in NPDES Permit

OUTFALL 001 (Schuylkill River)		
PARAMETER	LIMIT	MONITORING
Total Dissolved Solids *	1,000 mg/l	Quarterly

* NPDES Permit No. PA0050326 requires quarterly monitoring only for total dissolved solids (TDS). This docket includes an average monthly effluent limit of 1,000 mg/l TDS. See Condition C.II.s. in the Decision section

B. FINDINGS

The docket holder submitted an Application to renew the approval of their existing 1.2 mgd Conshohocken IWTP and its discharge. No modifications to the IWTP are proposed.

Near the project site, the Schuylkill River has an estimated seven-day low flow with a recurrence interval of ten years (Q₇₋₁₀) of 194 mgd (300 cfs). The ratio of this low flow to the average design process water discharge from the facility (1.2 mgd) is 160 to 1.

The nearest surface water intake of record for public water supply downstream of the project discharge is the Queen Lane intake operated by the Philadelphia Water Department on the Schuylkill River, located approximately 9 miles downstream of the project outfall.

The project does not conflict with the Comprehensive Plan and is designed to prevent substantial adverse impact on the water resources related environment, while sustaining the current and future water uses and development of the water resources of the Basin.

The effluent limits in the NPDES Permit are in compliance with Commission effluent quality requirements, where applicable.

The project is designed to produce a discharge meeting the effluent requirements as set forth in the Commission’s *Water Quality Regulations (WQR)*.

C. DECISION

I. Effective on the approval date for Docket No. D-1979-026-3 below, the project described in Docket D-1979-026-2 is terminated and replaced by Docket No. D-1979-026-3 to the extent that it is not included in Docket No. D-1979-026-2.

II. The project and appurtenant facilities as described in the Section A “Physical features” of this docket are approved pursuant to Section 3.8 of the *Compact*, subject to the following conditions:

a. Docket approval is subject to all conditions, requirements, and limitations imposed by the PADEP in its NPDES permit.

b. The facility and operational records shall be available at all times for inspection by the DRBC.

c. The facility shall be operated at all times to comply with the requirements of the Commission’s *WQR* and *Flood Plain Regulations (FPR)*.

d. The docket holder shall comply with the requirements contained in the EFFLUENT TABLES in Section A.4.d. of this docket. The docket holder shall submit the required monitoring results electronically to the DRBC Project Review Section via email aemr@drbc.state.nj.us on the **Annual Effluent Monitoring Report Form** located at this web address: <http://www.state.nj.us/drbc/programs/project/pr/info.html>. The monitoring results shall be submitted annually, absent any observed limit violations, by January 31. If a DRBC effluent limit is violated, the docket holder shall submit the result(s) to the DRBC within 30 days of the violation(s) and provide a written explanation that states the action(s) the docket holder has taken to correct the violation(s) and protect against any future violations.

e. Except as otherwise authorized by this docket, if the docket holder seeks relief from any limitation based upon a DRBC water quality standard or minimum treatment requirement, the docket holder shall apply for approval from the Executive Director or for a docket revision in accordance with Section 3.8 of the *Compact* and the *Rules of Practice and Procedure*.

f. If at any time the receiving treatment facilities prove unable to produce an effluent that is consistent with the requirements of this docket approval, no further connections shall be permitted until the deficiency is remedied.

g. Nothing herein shall be construed to exempt the docket holder from obtaining all necessary permits and/or approvals from other State, Federal or local government agencies having jurisdiction over this project.

h. The docket holder is permitted to treat and discharge wastewaters as set forth in the Area Served Section of this docket, which incorporates by reference Sections B (Type of Discharge) and D (Service Area) of the docket holder's Application to the extent consistent with all other conditions of this DECISION Section.

i. The docket holder shall discharge wastewater in such a manner as to avoid injury or damage to fish or wildlife and shall avoid any injury to public or private property.

j. No sewer service connections shall be made to newly constructed premises with plumbing fixtures and fittings that do not comply with water conservation performance standards contained in Resolution No. 88-2 (Revision 2).

k. Nothing in this docket approval shall be construed as limiting the authority of DRBC to adopt and apply charges or other fees to this discharge or project.

l. The issuance of this docket approval shall not create any private or proprietary rights in the waters of the Basin, and the Commission reserves the right to amend, suspend or rescind the docket for cause, in order to ensure proper control, use and management of the water resources of the Basin.

m. The docket holder is responsible for timely submittal to the DRBC of a docket renewal application on the appropriate application form including the appropriate docket application filing fee (see 18 CFR 401.43) at least 6 months in advance of the docket expiration date set forth below. The docket holder will be subject to late filed renewal surcharges in the event of untimely submittal of its renewal application, whether or not DRBC issues a reminder notice in advance of the deadline or the docket holder receives such notice. In the event that a timely and complete application for renewal has been submitted and the DRBC is unable, through no fault of the docket holder, to reissue the docket before the expiration date below, the terms and conditions of the current docket will remain fully effective and enforceable against the docket holder pending the grant or denial of the application for docket approval.

n. The docket holder shall be subject to applicable DRBC regulatory program fees, in accordance with duly adopted DRBC resolutions and/or regulations (see 18 CFR 401.43).

o. This approval is transferable by request to the DRBC Executive Director provided that the project purpose and area served approved by the Commission in this docket will not be materially altered because of the change in project ownership. The request shall be submitted on the appropriate form and be accompanied by the appropriate fee (see 18 CFR 401.43).

p. The docket holder shall request a name change of the entity to which this approval is issued if the name of the entity to which this approval is issued changes its name. The

request for name change shall be submitted on the appropriate form and be accompanied by the appropriate fee (see 18 CFR 401.43).

q. The Executive Director may modify or suspend this approval or any condition thereof, or require mitigating measures pending additional review, if in the Executive Director's judgment such modification or suspension is required to protect the water resources of the Basin.

r. Any person who objects to a docket decision by the Commission may request a hearing in accordance with Article 6 of the Rules of Practice and Procedure. In accordance with Section 15.1(p) of the Delaware River Basin Compact, cases and controversies arising under the Compact are reviewable in the United States district courts.

s. The docket holder may request of the Executive Director in writing the substitution of specific conductance for TDS. The request should include information that supports the effluent specific correlation between TDS and specific conductance. Upon review, the Executive Director may modify the docket to allow the substitution of specific conductance for TDS monitoring.

t. The docket holder is prohibited from treating/pre-treating any hydraulic fracturing wastewater from sources in or out of the Basin at this time. Should the docket holder wish to treat/pre-treat hydraulic fracturing wastewater in the future, the docket holder will need to first apply to the Commission to renew this docket and be issued a revised docket allowing such treatment and an expanded service area. Failure to obtain this approval prior to treatment/pre-treatment will result in action by the Commission.

BY THE COMMISSION

DATE APPROVED: September 13, 2017

EXPIRATION DATE: June 30, 2022