

Ohio EPA

Re: OEPA Permit No. 3IF00006*GD

PC 7-6-84
X

June 25, 1984

GenCorp, Inc.
GTR Chemical Division
P.O. Box 68
Ashtabula, Ohio 44004

Gentlemen:

Transmitted herewith is one copy of the Public Notice, Fact Sheet and Draft Permit in the above-referenced matter.

The public has been invited to submit comments regarding this Draft Permit. If sufficient public interest is indicated, a public meeting will be held.

The permit as drafted will be issued as a final action unless the Director revises the permit after consideration of all written comments received during the 30 day period following Public Notice and consideration of the record of a public meeting, if one is held, or unless the draft is disapproved by the Regional Administrator, U.S. Environmental Protection Agency.

You should note that a general condition of your permit states that issuance of an NPDES permit does not relieve you of the duty of complying with all applicable Federal, State, and local laws, ordinances, and regulations.

Sincerely,

Sandra J. Turner

Sandra J. Turner, Manager
Permits and Compliance Section

SJT/jtr

Certified Mail

vmp - 04/NE

Application No.: OH0002283

OEPA Permit No.: 3IF00006*GD

Effective Date:

National Pollutant Discharge Elimination System (NPDES) Permit Program

PUBLIC NOTICE

NPDES Permit Renewal to Discharge to State Waters

Ohio Environmental Protection Agency
P.O. Box 1049
361 East Broad Street
Columbus, Ohio 43216
614-466-4891

Public Notice No. OEPA-84-06-034
Date of Issue of Public Notice: June 29, 1984

Name and Address of Applicant: GenCorp, Inc., GTR Chemical Division, P.O. Box 68, Ashtabula, Ohio 44004

Name and Address of Facility where Discharge Occurs: GenCorp, Inc., GTR Chemical Division, Middle Road, Ashtabula, Ohio

Location of Discharge: 41° 53' 15"N; 80° 45' 40"W

Receiving Water: Fields Brook

This applicant is a manufacturer of polyvinyl chloride and vinyl acetate - vinyl chloride copolymer and has 1 existing discharge point. The current operations of this discharger result in an average effluent flow of 400,000 gallons per day. Key parameters to be limited in the permit are as follows: Biochemical Oxygen Demand, COD, Total Suspended Solids, Total Dissolved Solids, Mono Vinyl Chloride. Director's Findings and Orders to be issued in conjunction with this permit also available for inspection.

Form EPA 4434

GENC 19910

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Application No.: OH0002283

OEPA Permit No.: 3IF00006*GD

Public Notice No. OEPA-84-06-034

On the basis of preliminary staff review and application of standards and regulations, the Director of the Ohio Environmental Protection Agency will issue a permit for the discharge subject to certain effluent conditions and special conditions. The draft permit will be issued as a final action unless the Director revises the draft after consideration of the record of a public meeting or written comments, or upon disapproval by the Administrator of the U.S. Environmental Protection Agency. Any person may submit written comments on the draft permit and administrative record and may request a public hearing. A request for public hearing shall be in writing and shall state the nature of the issues to be raised. In appropriate cases, including cases where there is significant public interest, the Director may hold a public hearing on a draft permit or permits prior to final issuance of the permit or permits. Following final action by the Director, any aggrieved party has the right to appeal to the Environmental Board of Review.

Interested persons are invited to submit written comments upon the discharge permit. Comments should be submitted in person or by mail no later than 30 days after the date of this Public Notice. Deliver or mail all comments to:

Permit and Approval Section
Ohio Environmental Protection Agency
P.O. Box 1049
361 East Broad Street
Columbus, Ohio 43216

The OEPA permit number and Public Notice numbers should appear next to the address on the envelope and on each page of any submitted comments. All comments received no later than 30 days after the date of this Public Notice will be considered.

The application, fact sheets, permit including effluent limitations, special conditions, comments received and other documents are available for inspection and may be copied at a cost of 15 cents per page at the Ohio Environmental Protection Agency at the address shown above any time between the hours of 8:00 a.m. and 4:30 p.m., Monday through Friday. Copies of the Public Notice are available at no charge at the same address.

Mailing lists are maintained for persons or groups who desire to receive Public Notice for all applications in the state or for certain geographical areas. Persons or groups may also request copies of fact sheets, applications or other documents pertaining to specific applications. Persons or groups may have their names put on such a list by making a written request to the Agency at the address shown above.

OEPA Permit No.: 3IF00006*GD

Application No.: OH 0002383

National Pollutant Discharge Elimination System (NPDES) Permit Program

FACT SHEET

Regarding NPDES Permit to Discharge to State Waters

Ohio Environmental Protection Agency
P. O. Box 1049
361 East Broad Street
Columbus, Ohio 43216
614-466-4891

Public Notice No.: 84-06-034
Public Notice Date: June 29, 1984

Name and Address of Applicant:
GenCorp, Inc.
GTR Chemical Division
P.O. Box 68
Ashtabula, Ohio 44004

Name and Address of Facility
Where Discharge Occurs:
GenCorp, Inc.
GTR Chemical Division
Middle Road
Ashtabula, Ohio

Receiving Water: Fields Brook

I. Location of Discharge

The above named applicant has applied for an NPDES permit, which will be issued by the Ohio Environmental Protection Agency, to discharge into the designated receiving water. A description and/or sketch of the location of the discharge is appended as Attachment I.

II. Description of Existing Discharge

A quantitative description of the existing discharge in terms of significant effluent parameters is appended as Attachment II.

III. Determinations

The Ohio Environmental Protection Agency has examined the application and has made the determination to issue the permit subject to certain effluent limitations and other mandatory conditions.

The effluent limitations in the permit are appended as Attachment IIIa.

The schedule of compliance for meeting the effluent limitations is appended as Attachment IIIb.

Derivation and calculation of specific effluent limitations are accomplished in accordance with standard engineering practices and applicable guidelines, standards and documents. Justification of specific characteristics is appended as Attachment IV.

GENC 19912

The other special conditions in the permit may include, but are not necessarily limited to: monitoring, recording, and reporting discharges, limiting discharges of oil, hazardous substances, collected solids, visible floating solids, foams, prevention and containment; and prohibiting bypass of treatment facilities. Persons wishing further information about the special conditions may contact the Ohio Environmental Protection Agency.

Permit requirements are based upon Section 6111.03(J) of the Ohio Revised Code and upon Chapter 3745-33 of the Ohio Administrative Code in order to achieve and maintain full compliance with national effluent limitations, standards of performance, toxic and pretreatment standards.

IV. Procedures for the Formulation of Final Determinations

The determination shall be issued as a final action unless the Director revises the draft after consideration of the record of a public meeting or written comments, or upon disapproval by the Administrator of the U.S. Environmental Protection Agency.

Within thirty days of the date of the Public Notice, any person may request or petition for a public meeting for presentation of evidence, statements or opinions. The purpose of the public meeting or hearing is to obtain additional evidence. Statements concerning the issues raised by the party requesting the hearing are invited. Evidence may be presented by the applicant, the state, and other parties, and following presentation of such evidence other interested persons may present testimony of facts or statements of opinion.

Requests for public meeting should be addressed to:

Legal Records Section
Ohio Environmental Protection Agency
P. O. Box 1049
361 East Broad Street
Columbus, Ohio 43216

Interested persons are invited to submit written comments upon the discharge permit. Comments should be submitted in person or by mail no later than 30 days after the date of this Public Notice. Deliver or mail all comments to:

Permit and Approval Section
Ohio Environmental Protection Agency
P. O. Box 1049
361 East Broad Street
Columbus, Ohio 43216

The OEPA permit number and Public Notice numbers should appear next to the above address on the envelope and on each page of any submitted comments. All comments received no later than 30 days after the date of the Public Notice will be considered.

Form EPA 4436

The application, fact sheets, permit including effluent limitations, special conditions, comments received and other documents are available for inspection and may be copied at a cost of 15 cents per page at the Ohio Environmental Protection Agency at the address shown above any time between the hours of 8:00 a.m. and 4:30 p.m., Monday through Friday. Copies of the Public Notice are available at no charge at the same address.

Mailing lists are maintained for persons or groups who desire to receive Public Notice for all applications in the state or for certain geographical areas. Persons or groups may also request copies of fact sheets, applications or other documents pertaining to applications. Persons or groups may have their names put on such a list by making a written request to the Agency at the address shown above.

V. Use Classification, Water Quality Standards, Effluent Limitations and Significant Factual and Legal Questions Considered.

The receiving water is classified for Warmwater Habitat, Primary Contact Recreation, Agricultural and Industrial Water Supply.

The following water quality standards and effluent standards and limitations were applied to the discharge: Best Conventional Pollutant Control Technology, Best Available Technology, Ohio Water Quality Standards

The terms and conditions of the permit will comply with the requirements of Chapter 3745-33, Ohio Administrative Code and Section 6111.03(J), Ohio Revised Code.

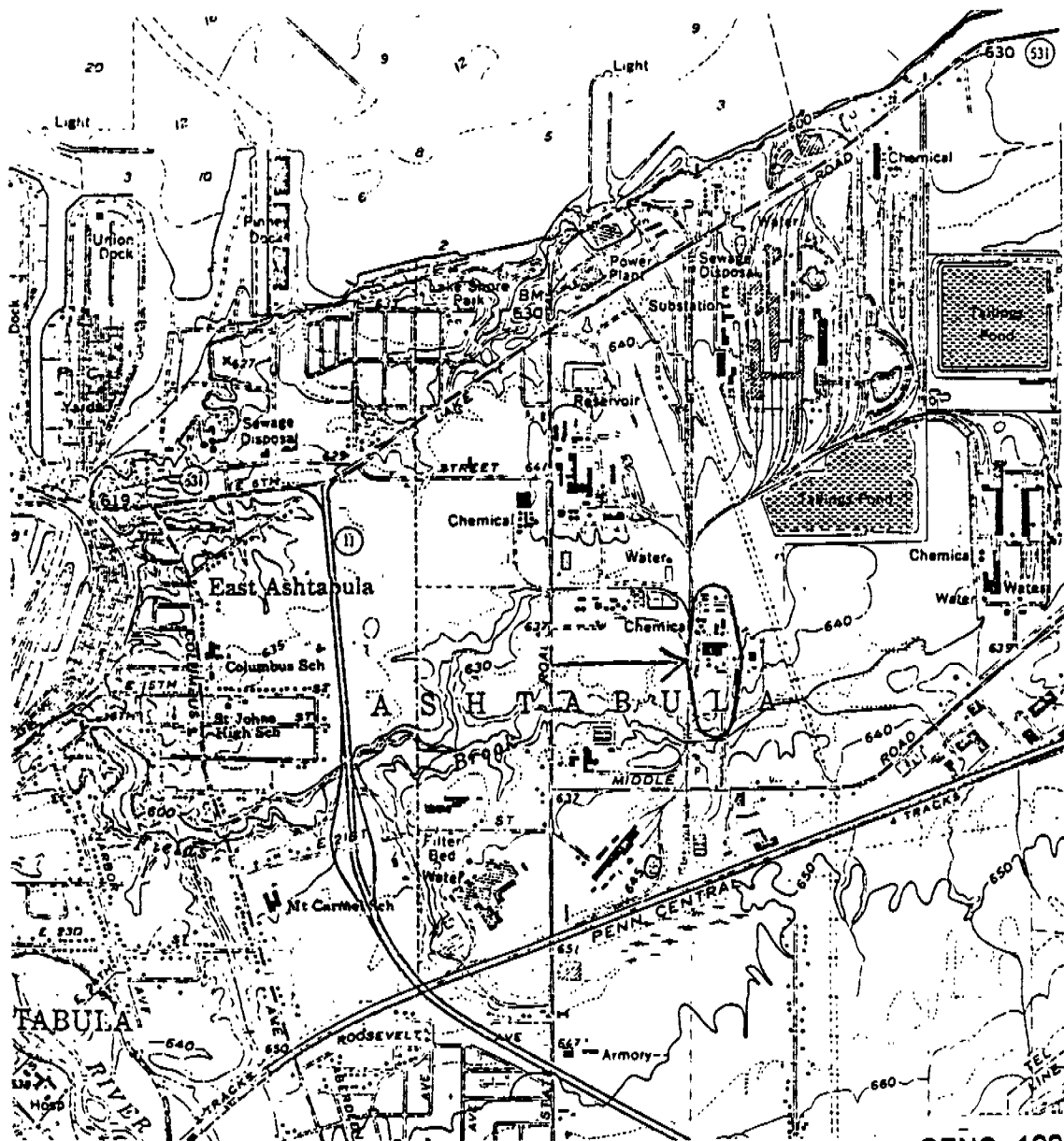
VI. Average Flows and Temperature, if significant.

The discharge from this facility into waters of the state is as follows:

<u>Discharge Point</u>	<u>Average Monthly Flows (MGD)</u>
001	.400

VII. This permit contains limitations on toxic pollutants because it is known or believed that there is or may be such pollutants in the effluent.

NPDES No. 3IF00006*
Gen Corp Inc.
GTR Chemical Div.
Ashtabula, Ashtabula Co.



GENC 19915

ATTACHMENT I

USGS Topo Map 2 NE

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date and lasting until July 1, 1985, the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from the following outfall: 3IF0006001. SEE PART II, OTHER REQUIREMENTS, for location of effluent sampling.

<u>EFFLUENT CHARACTERISTIC</u>			<u>DISCHARGE LIMITATIONS</u>			
REPORTING Code	UNITS	PARAMETER	Concentration		Loading	
			Other Units	(Specify)	kg/day	
			30 day	Daily	30 day	Daily
50050	MGD	Flow	-	-	-	-
00310	mg/l	BOD ₅	(22)	(49)	(42)	(93)
00335	mg/l	COD	150	290	-	(549)
00530	mg/l	Suspended Solids	20	40	(38)	(76)
00515	mg/l	Dissolved Solids	900	1570	(1700)	(3000)
70352	mg/l	Mono Vinyl Chloride	-	(0.250)	-	(0.47)
00010	°C	Temperature	-	-	-	-
01051	ug/l	Total Lead	-	-	-	-

O = changed

2. The pH (Reporting Code 00400) shall not be less than 6.5 S.U. nor greater than 9.0 S.U. and shall be monitored daily by grab sample.
3. Samples taken in compliance with monitoring requirements specified above shall be taken at Sampling Stations described in Part II, OTHER REQUIREMENTS.
4. See PART II, OTHER REQUIREMENTS.

ATTACHMENT II

OEPA 3IF00006*60

PART I, A - FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from the following outfall: 3IF00006001. SEE PART II, OTHER REQUIREMENTS, for location of effluent sampling.

<u>EFFLUENT CHARACTERISTIC</u>			<u>DISCHARGE LIMITATIONS</u>			
REPORTING Code	UNITS	PARAMETER	Concentration		Loading	
			Other Units	(Specify)	kg/day	
			30 day	Daily	30 day	Daily
50050	MGD	Flow	-	-	-	-
00310	mg/l	BOD ₅	22	49	42	93
00335	mg/l	COD	150	290	-	549
00530	mg/l	Total Suspended Solids	20	40	38	76
00515	mg/l	Total Dissolved Oxygen	900	1570	1700	3000
70352	mg/l	Mono Vinyl Chloride	-	0.05	-	0.09
00010	°C	Temperature	-	-	-	-
01051	ug/l	Total Lead	-	-	-	-

○ = changed

2. The pH (Reporting Code 00400) shall not be less than 6.5 S.U. nor greater than 9.0 S.U. and shall be monitored daily by grab sample.
3. Samples taken in compliance with monitoring requirements specified above shall be taken at Sampling Stations described in Part II, OTHER REQUIREMENTS.
4. See PART II, OTHER REQUIREMENTS.

ATTACHMENT IIIa

Form EPA 4436

GENC 19917

OEPA 3IF00006*GD.

PART I, A - FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from the following outfalls: 3IF00006601 and 3IF600006602. SEE PART II, OTHER REQUIREMENTS, for location of effluent sampling. *Sub to No. 4*

REPORTING Code	UNITS	PARAMETER	DISCHARGE LIMITATIONS			
			Concentration		Loading	
			Other Units (Specify)	30 day	kg/day	30 day
				Daily	Daily	Daily
50050 MGD		Flow	-	-	-	-
00310 mg/l		BOD ₅	-	-	-	-
00335 mg/l		COD	-	-	-	-
00530 mg/l		Total Suspended Solids	-	-	-	-
00515 mg/l		Total Dissolved Solids	-	-	-	-
70352 mg/l		Mono Vinyl Chloride	-	-	-	-
00010 °C		Temperature	-	-	-	-
01051 ug/l		Total Lead	-	-	-	-

2. The pH (Reporting Code 00400) shall not be less than 6.5 S.U. nor greater than 9.0 S.U. and shall be monitored daily by grab sample.
3. Samples taken in compliance with monitoring requirements specified above shall be taken at Sampling Stations described in Part II, OTHER REQUIREMENTS.
4. See PART II, OTHER REQUIREMENTS.

ATTACHMENT IIIa

Form EPA 4436

GENC 19918

OEPA 3IF00006*GD

PART I, C. - SCHEDULE OF COMPLIANCE

1. The permittee shall achieve compliance with specified effluent limitations in accordance with the following schedule:
 - A. Install flow measurement facilities at outfall 3IF00006601 capable of measuring and recording the expected range of flows bypassing lagoons 4 and 5 no later than October 1, 1984.

ATTACHMENT IIIb

Form EPA 4436

GENC 19919

ATTACHMENT IV-JUSTIFICATION OF SPECIFIC CHARACTERISTICS

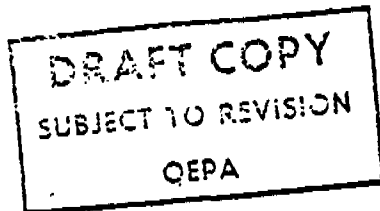
Final Table
Outfall: 3IF00006001

Final Table
Outfalls: 3IF00006601
3IF00006602

<u>Characteristic</u>	<u>Justification</u>	<u>Characteristic</u>	<u>Justification</u>
Flow	Monitor Only	Flow	Monitor Only
BOD	proposed BCT	BOD	Monitor Only
COD	EEQ	COD	Monitor Only
TSS	EEQ	TSS	Monitor Only
TDS	EEQ	TDS	Monitor Only
Mono vinyl chloride	proposed BAT	mono vinyl chloride	Monitor Only
Temperature	Monitor Only	Temperature	Monitor Only
pH	WQS	pH	WQS
Pb	Monitor Only	Pb	Monitor Only

Abbreviations Mean: (WQS) Ohio Water Quality Standards, 2-14-78; MRS (Mahoning River Standards, 11/14/77); IJC (International Joint Commission, 1978 Great Lakes Water Quality Agreement); ORS (ORSANCO); BEJ (Best Engineering Judgement, P.L. 95-217, Section 402 (a)(1); EEQ (Existing Effluent Quality, OAC 3745-33-04(B)(3)); BPT (Best Practicable Control Technology); BCT (Best Conventional Pollutant Control Technology); BAT (Best Available Technology); NSPS (New Source Performance Standards)

04/NE



Page 1 of 14

OEPA Permit No. 3IF00006*GD

Application No. OH0002283

Effective Date:

Expiration Date: 5 Years

OHIO ENVIRONMENTAL PROTECTION AGENCY
AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, as amended (33 U.S.C. 1251 et. seq. hereinafter referred to as "the Act"), and the Ohio Water Pollution Control Act (Ohio Revised Code Section 6111),

GenCorp, Inc.
GTR Chemical Division

is authorized by the Ohio Environmental Protection Agency, hereafter referred to as "Ohio EPA", to discharge from the wastewater treatment works located on Middle Road, Ashtabula, Ohio and discharging to Fields Brook in accordance with the conditions specified in Parts I, II and III of this permit.

This permit is conditioned upon payment of applicable fees as required by Section 3745.11 of the Ohio Revised Code.

This permit and the authorization to discharge shall expire at midnight on the expiration date shown above. In order to receive authorization to discharge beyond the above date of expiration, the permittee shall submit such information and forms as are required by the Ohio EPA no later than 180 days prior to the above date of expiration.

Steven J. Grossman
Assistant Director
Form EPA 4428

GENC 19921

PART I, A - FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from the following outfall: 3IF00006001. SEE PART II, OTHER REQUIREMENTS, for location of effluent sampling.

<u>EFFLUENT CHARACTERISTIC</u>		<u>DISCHARGE LIMITATIONS</u>				<u>MONITORING REQUIREMENTS</u>	
REPORTING Code	UNITS PARAMETER	Concentration		Loading		Meas. Freq.	Sample Type
		Other Units	(Specify)	kg/day			
		30 day	Daily	30 day	Daily		
50050 MGD	Flow	-	-	-	-	Daily	24 Hour Total
00310 mg/l	BOD ₅	22	49	42	93	1/Week	Composite
00335 mg/l	COD	150	290	-	549	1/Week	Composite
00530 mg/l	Total Suspended Solids	20	40	38	76	1/Week	Composite
00515 mg/l	Total Dissolved Oxygen	900	1570	1700	3000	1/Week	Composite
70352 mg/l	Mono Vinyl Chloride	-	0.05	-	0.09	2/Week	Grab
00010 °C	Temperature	-	-	-	-	1/Week	Max. Ind. Therm.
01051 ug/l	Total Lead	-	-	-	-	1/Month	Composite

2. The pH (Reporting Code 00400) shall not be less than 6.5 S.U. nor greater than 9.0 S.U. and shall be monitored daily by grab sample.
3. Samples taken in compliance with monitoring requirements specified above shall be taken at Sampling Stations described in Part II, OTHER REQUIREMENTS.
4. See PART II, OTHER REQUIREMENTS.

PART I, A - FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from the following outfalls: 3IF00006601 and 3IF600006602. SEE PART II, OTHER REQUIREMENTS, for location of effluent sampling.

<u>EFFLUENT CHARACTERISTIC</u>			<u>DISCHARGE LIMITATIONS</u>				<u>MONITORING REQUIREMENTS</u>	
REPORTING Code	UNITS	PARAMETER	Concentration		Loading		Meas.	Sample
			Other Units	(Specify)	kg/day		Freq.	Type
			30 day	Daily	30 day	Daily		
50050 MGD		Flow	-	-	-	-	Daily	24 Hour Total
00310 mg/l		BOD ₅	-	-	-	-	1/Week	Composite
00335 mg/l		COD	-	-	-	-	1/Week	Composite
00530 mg/l		Total Suspended Solids	-	-	-	-	1/Week	Composite
00515 mg/l		Total Dissolved Solids	-	-	-	-	1/Week	Composite
70352 mg/l		Mono Vinyl Chloride	-	-	-	-	2/Week	Grab
00010 °C		Temperature	-	-	-	-	1/Week	Max. Ind. Therm.
01051 ug/l		Total Lead	-	-	-	-	1/Month	Composite

2. The pH (Reporting Code 00400) shall not be less than 6.5 S.U. nor greater than 9.0 S.U. and shall be monitored daily by grab sample.
3. Samples taken in compliance with monitoring requirements specified above shall be taken at Sampling Stations described in Part II, OTHER REQUIREMENTS.
4. See PART II, OTHER REQUIREMENTS.

PART I, B. - ADDITIONAL MONITORING REQUIREMENTS

1. Upstream and Downstream. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee shall monitor the receiving stream, upstream of the point of discharge at Station Number 3IF00006801, and downstream of the point of discharge at Station Number 3IF00006901, and report to the Ohio EPA in accordance with the following table. SEE PART II, OTHER REQUIREMENTS for location of sampling.

<u>EFFLUENT CHARACTERISTIC</u>			<u>MONITORING REQUIREMENTS</u>	
<u>REPORTING</u>			<u>Measurement</u>	
<u>Code</u>	<u>UNITS</u>	<u>PARAMETER</u>	<u>Frequency</u>	<u>Sample Type</u>
00400	S.U.	pH	1/Month	Grab
00515	mg/l	Dissolved Solids	1/Month	Grab
00010	°C	Temperature	1/Month	Grab
70352	mg/l	Mono Vinyl Chloride	1/Month	Grab

PART I, C. - SCHEDULE OF COMPLIANCE

1. The permittee shall achieve compliance with specified effluent limitations in accordance with the following schedule:
 - A. Install flow measurement facilities at outfall 3IF00006601 capable of measuring and recording the expected range of flows bypassing lagoons 4 and 5 no later than October 1, 1984.

PART II, OTHER REQUIREMENTS

- A. Description of the location of the required sampling stations are as follows:

<u>Sampling Station</u>	<u>Description of Location</u>
3IF00006001	Existing Parshall flume downstream of lagoon #5
3IF00006601	Lift station bypass flow
3IF00006602	Old Olin weir downstream of lagoon #5
3IF00006801	Fields Brook immediately upstream of Outfall 3IF00006001
3IF00006901	Fields Brook immediately upstream of SCM Plant #2 (formerly G+W) outfall 3IE00017001

- B. In addition to the reporting required by the paragraph entitled "REPORTING" in Part III, General Conditions, monitoring results obtained during each month shall be summarized and reported on a Discharge Monitoring Report Form (EPA No. 3320-1 or T-40 as appropriate), to be received no later than the 15th of the next month. The original copy of the report form shall be signed and mailed to:

Ohio Environmental Protection Agency
Technical Records Section
Post Office Box 1049
Columbus, Ohio 43216

- C. This permit shall be modified, or alternatively, revoked and reissued, to comply with any applicable effluent standard or limitation issued or approved under sections 301(b)(2) (C), and (D), 304(b)(2), and 307(a)(2) of the Clean Water Act, if the effluent standard or limitation so issued or approved:

- (1) Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
- (2) Controls any pollutant not limited in the permit.

The permit as modified or reissued under this paragraph shall also contain any other requirements of the Act then applicable.

- D. In the event the permittee's operation shall require the use of cooling water treatment additives, written permission must be obtained from the Ohio Environmental Protection Agency. The permittee shall demonstrate that the use of the additive in the concentrations expected will not be harmful or inimical to aquatic life as determined by acute static bioassays.

PART II, OTHER REQUIREMENTS (cont.)

E. Outfalls 3IF00006601 and 3IF00006602 monitoring requirements during the following flow conditions shall be as stated below:

1. Monitor at Outfall 3IF00006602 when Outfall 3IF00006001 is flooded and no bypassing at the lift station is occurring. The effluent limitations of Outfall 3IF00006001 shall apply. *Oliver*
2. Monitor at Outfalls 3IF00006601 and 3IF00006602 when 3IF00006001 is flooded and lift station bypassing is occurring. The mass loading limitations of Outfall 3IF00006001 shall apply to the sum of the mass loadings of Outfalls 3IF00006601 and 3IF00006602. Outfall 3IF00006601 may be sampled at any point between the lift station and the inlet to lagoon #4. *Oliver*

F. TOXICITY EVALUATION OF NEW PRODUCTS

Prior to discharging wastewater effluents from new products to the plant effluent system, the permittee shall establish the toxicity of the respective wastewater through existing published data and/or data generated by the permittee using process evaluations, chemical analysis, and screening bioassays. In accordance with Part III, 15, the permittee shall submit the toxicity evaluation to the Ohio EPA prior to discharging the new process effluent to the wastewater treatment system.