

**Public Comments and EPD Responses on Draft Pretreatment Permit
YKK AP America, Inc. – Permit No. GAP050119**

COMMENT RECEIVED	EPD RESPONSE
<p>1. YKK AP request that EPD delay issuance of the Permit until December 2022 to allow YKK to complete its evaluation of a modified effluent treatment process to meet the significantly more stringent chromium limit imposed by the Permit.</p> <p>2. YKK AP intends to run a full-scale trial through the end of November 2022 to ensure the revised process consistently meets the Permit's chromium limits as well as other permit limits. This letter confirms AP's oral request to EPD that no final permit be issued until this trial is successfully completed. In the unlikely event the trial is unsuccessful, YKK AP will be prepared to enter a mutually-agreed consent order with EPD contemporaneous with the Permit's final issuance that provides for an alternative approach to identifying and implementing processes that will meet the new limits.</p>	<p>The public notice period for the Draft Permit ended on October 24, 2022. An effective date of December 01, 2022 has been set for the reissuance of pretreatment permit no. GAP050119.</p> <p>The December 1st effective date will allow the facility to run a full-scale treatment trial through the end of November to ensure the revised treatment process consistently meets the Permit's chromium limits as well as all other permit limits. The Facility has proposed changes to the treatment process which includes the replacement of sodium metabisulfite previously used in the treatment process with a ferrous chloride-based chemistry, removal of the water conditioner previously used, and a switch of the polymer used in treatment. Additional operational changes such as pH adjustments and changes to polymer quantity and rate of addition will be tested during the full-scale trial. The proposed treatment changes do not require a modification of the Draft Permit placed on public notice or increase the quantity of pollutants discharged or result in the discharge of pollutants that were not being discharged prior to the planned change.</p> <p>The permit will become effective December 01, 2022, regardless of whether the trial is successful. Should the trial be unsuccessful in bringing the Facility into compliance with the Final Permit limits, YKK AP may enter into a consent order with EPD to identify and implement processes to come into compliance with the permit limits.</p>
<p>Historically, EPD has permitted the Facility under the federal regulations for Metal Finishing Point Source categories at 40 CFR Part 433. However, EPD has now determined that a different category, the Aluminum Forming Point Source category at 40 CFR Part 467, should</p>	<p>Operations at the YKK AP facility are subject to the effluent limitation guidelines at 40 CFR 467, Subpart C – Extrusion Subcategory. The applicability of facility operations under these federal regulations are not impacted by the performance of the City of Dublin's treatment</p>

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<p>apply to the Facility. As a result of that change, the effluent limitations for a number of parameters have been significantly reduced as compared to limitations imposed in all previously issued Facility pretreatment permits. While the Facility's historic treatment process (outlined in previous applications to EPD) is able to treat YKK AP's effluent to the more stringent levels imposed by the Permit for most parameters, it is not able to do so consistently for chromium. Previously, YKK AP's chromium limit was 4.96 lbs/day daily average and 6.26 lbs/day daily max; under the Draft Permit, those levels were reduced to 0.18 lbs/day daily average (an approximately 96% reduction) and 0.45 lbs/day daily max (an approximately 93% reduction).</p> <p>YKK AP disagrees that the Aluminum Forming Point Source Category is applicable to the Facility and believes the category change is unwarranted and unnecessary, including because there is no indication that YKK AP's discharge results in any issues with the City of Dublin's system. Regardless, as has been communicated to EPD, YKK AP is prepared to accept the Draft Permit as a Final Permit given EPD's willingness to work with YKK AP to ensure YKK AP is able to comply with the Permit once issued.</p>	<p>system and performance plays no role in the category change determination.</p> <p>The aluminum forming regulations at 40 CFR 467 cover surface treatment when performed as an integral part of aluminum forming operations. For the purposes of this regulation, surface treatment of aluminum is considered to be an integral part of aluminum whenever it is performed at the same plant site at which aluminum is formed. Cleaning and etching operations is used to generally describe any surface treatment processes (e.g., pickling, cleaning, etching, preparation, and pretreatment) other than solvent cleaning. (Development Document for Effluent Limitations Guidelines and Standards for the Aluminum Forming Point Source Category (June 1984), pg. 113) When conversion coating or anodizing are covered under 40 CFR 467, they are not subject to regulation under the provisions of 40 CFR 433, Metal Finishing. Wastewater from the facility's anodizing line and paintline is generated as part of surface treatment operations and is covered under 40 CFR 467 not 40 CFR 433. A detailed description of the applicability of 40 CFR 467 is included in the permit fact sheet and EPD's response to pre-draft comments.</p>