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October 24, 2023

Ms. Tessa Scalzo
Indiana Department of Environmental Management
Office of Water Quality – Compliance Branch
100 North Senate Ave
Indianapolis, Indiana 46204

**Re: 2023 Third Quarter Progress Report
Manasek Acquisition Company, LLC d/b/a Warner Bodies
Elwood, Indiana
IWP Permit Number INP000662
Enforcement Case # 2018-25516-W
August Mack Project Number JX0256.250**

Dear Ms. Scalzo:

August Mack Environmental, Inc. (August Mack) is submitting this Progress Report for the 3rd Quarter of 2023 on behalf of Warner Bodies regarding its facility located in Elwood, Indiana (Facility). This Progress Report is being submitted in accordance with the Agreed Order in the above-referenced Enforcement Case. As required by the Agreed Order, quarterly Progress Reports are required to be submitted by Warner Bodies to describe the progress of corrective actions to reduce Zinc and Total Toxic Organics (TTO) concentrations in the wastewater effluent. This Progress Report will detail the progress made following the proposed plan schedule as prescribed in the Compliance Plan and Additional Action Plan (AAP) submitted to the Indiana Department of Environmental Management (IDEM).

PROGRESS REPORT

Plan to Correct Zinc Exceedances

Corrective actions implemented by Warner Bodies have resulted in no zinc exceedances in 2023, with the exception of the months of May and June. The completion dates of major milestones is displayed in Table 1. Immediately following the receipt of reporting that indicated a zinc exceedance had occurred in May of 2023, Warner Bodies conducted a root cause analysis (RCA) to determine the source and corrective actions required to resolve the exceedance. The RCA was still ongoing through June of 2023, therefore an additional exceedance was not able to be avoided for that month. The activities associated with the RCA included:

Weekly internal process control sampling throughout treatment system;
 Recalibration of the pH probe;
 Modify set points for pH chemicals;
 Adjust the chemical dosage pumps for the anionic polymer;
 Modify chemical addition feed lines to ensure proper mixing;
 Removal of sludge from treatment tanks;
 Flush lines near sampling point; and,
 Inspection of entire treatment system.

The root issue was determined to be the accumulation of solids in a 3rd overflow tank in the wastewater flow. This 3rd tank had not previously been discovered and was therefore not included when solids removal occurred for the other tanks.

TABLE 1
Zinc Compliance Timeline

Completion Date	Activity/Milestone
1 st Quarter, 2021	Contract with August Mack Environmental
2 nd Quarter, 2021	Addition of Autosampler
2 nd Quarter, 2021	Bench Scale Testing
2 nd Quarter, 2021	SOPs for Daily System Checks
3 rd Quarter, 2021	Anionic Polymer
4 th Quarter, 2021	Installation of Micron Bag Filter
1 st Quarter, 2022	Chemical Feed Pump Set Points Modified
2 nd Quarter, 2022	Reduction of Bag Filter Mesh Size
2 nd Quarter, 2022	Internal Sampling
2 nd Quarter, 2023	Perform a Root Cause Analysis
2 nd Quarter, 2023	Discovery of Additional Treatment Tank
2 nd Quarter, 2023	Calibrate and Adjust pH and Chemical Feed Pump
2 nd Quarter, 2023	Evaluation of Bag Filter Mesh Size
2 nd Quarter, 2023	System Cleanout and Infrastructure Inspection

Results from the Root Cause Analysis were used to implement the following changes:

Anionic polymer dosing rates were adjusted to rates recommended during initial Bench Scale Testing (2nd Quarter, 2021);
 Inspection of the treatment system resulted in the discovery of an additional underground tank where solids were not removed during sludge removal;
 Weekly testing of sludge depth in all treatment tanks; and,
 SOPs modified for sludge removal based on sludge depths or every 6 months, whichever occurs first.

Since completion of the RCA activities in July of 2023, the average zinc concentration has been 0.54 mg/L (July 2023 - September 2023). While no additional compliance issues are expected, Warner Bodies and August Mack will continue to closely monitor the treatment system. As demonstrated by the response to the May 2023 exceedance, Warner Bodies has a robust response plan to rapidly evaluate and resolve increasing zinc concentrations prior to exceeding permit limitations.

Plan to Correct TTO Exceedances

The changeover to the degreaser that does not contain TTO compounds was completed in the 1st Quarter of 2021. Subsequent TTO analysis confirm that all TTO values have been within permit limits since December of 2021. The completion of major milestones to reduce TTO concentrations is displayed in Table 2.

**TABLE 2
TTO Compliance Timeline**

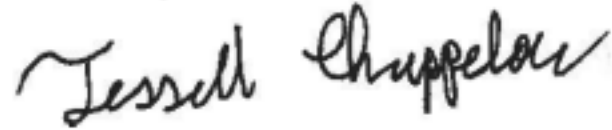
Completion Date	Activity/Milestone
1 st Quarter, 2021	Contract with August Mack Environmental
1 st Quarter, 2021	Change to TTO-free Degreaser
4 th Quarter, 2021	TTO Sample Below Permit Limits

CONCLUSION

August Mack and Warner Bodies are proceeding with the AAP as proposed. Upgrades to the wastewater treatment system are continuing. August Mack and Warner Bodies will provide data on system performance and next steps in the next quarterly progress report.

Should you have any questions or concerns regarding the report, please do not hesitate to contact us at 317.916.8000.

Sincerely,



Tessah Chappelow
Compliance Consultant



Jennifer Richards
Senior Consultant

Attachment

Cc: Mr. Richard Manasek, Owner, Warner Bodies
Mr. Craig Longstreth, President, Warner Bodies
Mr. Brian Lapp, CFO, Warner Bodies
Mr. Frank Deveau, Partner, Taft Stettinius & Hollister LLP
Mr. Will Gardner, Partner, Taft Stettinius & Hollister LLP
Mr. Andy Schmidt, Inspector, IDEM
Ms. Alice Smith, City of Elwood