



To: Chief Compliance Data Section  
Office of Land Quality

From: Becker Wahbeh, Plant Manager

Date: June 20, 2024

Subject: IWP Permit No. INP000686

Attn: Greg Glover

CC: Todd Williams, Samantha Smith, Timothy Guedel

Dear Mr. Glover,

Regarding the notice received May 20, 2024. I want to make you aware of our corrective actions to comply with the permit. The Zinc overage is related to filter press issue. The filter cloth was not changed to the scheduled time due to a delay in the delivery from supplier. Stock level was low due to the low frequency of replacement of this filter. To prevent a recurrence of replacement part shortage, we increased our min stock level to 2 (attached screen shot below). We have not had a repeat of Zinc overage since June 2022.

Regarding the oil and grease quantities, the North oil and grease separator has been on a 6-month cleaning as of Dec 15, 2021 as evidenced in the enclosed 2<sup>nd</sup> screen shot of our FIIX system. The overages in December 2023 and March 2024 were isolated incidents due to hydraulic leaks in our paint processing equipment that went unnoticed and into the paint waste stream. We improved our maintenance program to check for such leaks on weekly basis.

I trust this documentation will satisfy the request for a response and provide evidence of compliance with the permit. If you have any questions or concerns, please let me know.

Regards,

*Becker Wahbeh*  
Plant Manager

**Evidence of corrective action to address Zinc Overage**

Part/Supply: Filter Cloth; 630mm; NFC Tail; 121203986 (Paint-WWT) (A7781)



Filter Cloth; 630mm; NFC Tail; 121203986 (Paint-WWT) \*Head & Tail kept together in same bag\* (AB0040)



Code  
A7781

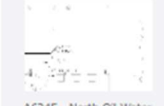
Category  
Filtration

Stock	Cycle Count	BOMs	Personnel	Warranties	Businesses	Files	Custom	Log
Stock Levels Per Location								
Location	Aisle	Row	Bin	Qty On Hand	Min Qty	Max Qty	Account (63101000) Materials and Supplies	
MX Crib (MX Crib)	102	02	D2	2.000	2.000		Charge Department (SGF01304) Reservoir Tube Assy	
							Criticality	
							Unspc Code	
							1 record.	

**Evidence of Dec 15, 2021 corrective action to address Oil & Grease Overage**

← Back Save Localize Generate Work Order Now Show Video Help

Scheduled Maintenance Details: Semi-Annual North Oil-Water Separator Pump Out



A6245 - North Oil Water Separator

**Online**

Set Offline

BWI - Greenfield Opera

Facilities

Add another asset

Code: Semi-Annual North Oil-Water Separator P

Asset: North Oil Water Separator (A6245)


Start As Work Order Status: Open

Maintenance Type: Facilities

Project:

Priority: Medium

Create a new work order even if there are work orders not closed from this Scheduled Maintenance

 Running

Estimated completion: 15 days after WO created

General	Scheduling	Nested PMs	Labor Tasks	Parts	Notifications	Notes	Files	Log
Code	Description	Work Order Status	Date Created					
56381	Semi-annual pick up on North Oil Water Separator.	Closed, Completed	Jan 02, 2024 06:07:51 AM					
53614	Semi-annual pick up on North Oil Water Separator.	Closed, Completed	Jul 02, 2023 06:08:33 AM					
49346	Semi-annual pick up on North Oil Water Separator.	Closed, Completed	Jan 02, 2023 06:13:19 AM					
42610	Semi-annual pick up on North Oil Water Separator.	Closed, Completed	Jul 02, 2022 06:06:03 AM					
32221	Semi-annual pick up on North Oil Water Separator.	Closed, Completed	Nov 02, 2021 06:11:22 AM					

Activity Log

Date	Log Type	Status	User	Notes
Jan 02, 2024 06:07:51...	Create Work Order	Success	<a href="#">Fix</a>	A trigger threshold was met and a w...
Jul 02, 2023 06:08:33...	Create Work Order	Success	<a href="#">Fix</a>	A trigger threshold was met, and a ...
Jan 02, 2023 06:13:19...	Create Work Order	Success	<a href="#">Fix</a>	A trigger threshold was met, and a ...
Jul 02, 2022 06:06:03...	Create Work Order	Success	<a href="#">Fix</a>	A trigger threshold was met, and a ...
Dec 27, 2021 06:51:1...	Edit Trigger	Success	<a href="#">Brad Moore</a>	From "Every 6 months on the 2nd" t...