



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

June 21, 2024

Via Email to: gstarkey@foxproducts.com
Mr. Gabe Starkey, Managing Director
Fox Products, Inc.
601 Hathaway Drive
South Whitley, Indiana 46787

Dear Mr. Starkey:

Re: Inspection Summary Letter
Fox Products, Inc.
NPDES Permit No. INP000648
South Whitley, Whitley County

An inspection of the above-referenced facility or location was conducted by a representative of the Indiana Department of Environmental Management, Northern Regional Office, pursuant to IC 13-18-3-9. A summary of the inspection is provided below:

Date(s) of Inspection: June 20, 2024
Type of Inspection: Compliance Evaluation Inspection
Inspection Results: Conditions evaluated were found to be satisfactory at the time of the inspection.

A copy of the NPDES Industrial Facility Inspection Report is enclosed for your records. Please direct any response to this letter and any questions to Lynn Stackhouse at 317-691-0099 or by email to lstack@idem.IN.gov.

Sincerely,

James E. Weingart, Director
Northern Regional Office

Enclosure



NPDES Industrial Facility Inspection Report
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: INP000648	Facility Type: Industrial	Minor	Facility Classification: B	TEMPO AI ID
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Date(s) of Inspection:	June 20, 2024
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Type of Inspection:	Compliance Evaluation Inspection
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Name and Location of Facility Inspected: Fox Products, Inc. 601 Hathaway Drive South Whitley	County: Whitley	Receiving Waters/POTW: South Whitley WWTP	Permit Expiration Date: Design Flow: NA
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On Site Representative(s):			
First Name Angela	Last Name Lysaght	Title Production/Plating Supervisor	Email ALysaght@foxproducts.com
			Phone 260-479-5736

Was a verbal summary of the inspection given to the on-site rep? **Yes**

Certified Operator: Zachary Bowman	Number: 21304	Class: B	Effective Date: 7-1-22	Expiration Date: 6-30-25	Email: zbowman@eaesllc.com
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Cyber Security Contact
Name: _____ Email: _____

Responsible Official: Mr. Gabe Starkey, Managing Director 601 Hathaway Drive South Whitley, Indiana 46787	Permittee: Fox Products, Inc.
	Email: gstarkey@foxproducts.com
	Phone: _____
	Fax: _____
Contacted? No	

INSPECTION FINDINGS

- Conditions evaluated were found to be satisfactory at the time of the inspection. (5)
- Violations were discovered but corrected during the inspection. (4)
- Potential problems were discovered or observed. (3)
- Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2)
- Violations were discovered and may subject you to an appropriate enforcement response. (1)

AREAS EVALUATED DURING INSPECTION

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Receiving Waters	S	Facility/Site	S	Self-Monitoring	N	Enforcement
S	Effluent/Discharge	S	Operation	S	Flow Measurement		
S	Permit	S	Maintenance	S	Laboratory	S	Effluent Limits Compliance
		S	Sludge	S	Records/Reports	N	Other:

DETAILED AREA EVALUATIONS

Receiving Waters:
N 1. The receiving stream was visibly free of excessive deposits of settled solids, floating debris, oil, scum, or billowy foam.
 Comments:
 The facility discharges into the Town of South Whitley's sanitary sewer system.

Effluent/Discharge:
N 1. Final effluent was essentially free of excessive solids, floating debris, oil, scum, or billowy foam.
S 2. Pretreatment discharge into sanitary sewers appeared free of excessive oils, grease, solids, or foam and did not appear to be in violation of the local Sewer Use Ordinance.
N 3. Pretreatment discharge into sanitary sewers did not contain materials that pass through or interfere with the operation of the POTW.
 Comments:
 The pretreatment system was in operation at the time of the inspection. The effluent was evaluated in the final tank and was clean and clear with no visible sheen.

Permit:

- S 1. Did the facility have a copy of the current permit available for reference.
- N 2. If the permit expires within 180 days, has a renewal application been submitted?
- S 3. Receiving waters are accurately described in the permit.
- N 4. The permit has been properly transferred if there is a new owner.
- N 5. The NPDES Permit Schedule of Compliance monitoring and reporting milestones have been met.

Comments:

The facility has a valid permit. The current permit expires in 2025. A permit renewal application will need to be submitted to IDEM by October 31, 2024.

Facility/Site:

- S 1. The facility was found to have standby power or equivalent provision, If required.
- S 2. An adequate alarm or notification system for power or equipment failure was available for the treatment facility.
- S 3. Safe and adequate access was provided for inspection of all treatment units and outfalls.
- S 4. Facilities and equipment did not appear beyond their useful life.
- 5. List any safety concerns noted during the inspection in the box below:

Comments:

The facility silver plates brass keys and parts for double reed musical instruments. All parts are initially cleaned and then plated in copper. The copper plating serves as an adhesive/primer for the final bright silver plating finish. Following each chemical treatment tank is either two or three rinse tanks. The first rinse tank following a chemical tank is self contained and has no overflow. These are pumped directly to the waste chemical storage tanks because of the higher metals concentration. All other rinse tanks are on a constant overflow to the holding tanks. Rinse tank waters are either RO or distilled water. The different stages or tanks from the plating process are directed to one of 4 holding tanks, depending on the source of the wastestream in the plating line. The four holding tanks include a cyanide tank, acid tank, rinse tank, and chemical treatment tank.

The holding tanks are then sent to the pretreatment system. Pretreatment includes cyanide destruction with pH adjustment, additional pH adjustment, flocculation, settling/clarifier, and final pH adjustment. Each treatment tank has inline pH meters that will automatically adjust chemical treatment feeds. In the event a pH is detected outside of a pre-set range, the system shuts off and alarms will alert staff to the problem.

Operation:

- N 1. All facilities and systems necessary for achieving compliance with the terms and conditions of the permit were operated efficiently, including an anticipated bypass report for steps of treatment taken out of service.
- S 2. An adequate, qualified operating staff was found to be provided to carry out the operation of the facility, including:
 - a. Certified Operator's on-site attendance and/or qualified operations personnel attendance was adequate.
 - b. Adequate documentation of operational activities, including system monitoring and cleaning.
 - c. Adequate funding to ensure proper operation.
- S 3. Solids handling procedures were adequate.
- N 4. Documentation of solids removal, handling, and disposal was adequate.

Comments:

All units of treatment appear to be operating efficiently, as evidenced by the effluent quality noted in the final adjustment tank. The in-line operational pH meters are calibrated twice annually. On site staff are well versed in the operation of the system and the certified operator is on site monthly.

Maintenance:

- S 1. A maintenance record system has been established and includes maintenance/repair history and preventative maintenance plan.
- S 2. Facility maintenance activities appeared adequate.

Comments:

The facility has a full time maintenance staff. All maintenance activities appeared to be satisfactory.

Sludge:

- S 1. Sludges, screenings, and slurries were found to be handled and disposed of properly.

Comments:

Settled solids are pressed 2 to 3 times weekly. Pressed solids are hauled off site by Crystal Clean for disposal.

Self-Monitoring:

- S 1. Samples were found to be taken at pre-designated locations and were found to be representative.
- S 2. Flow-proportioned samples were found to be obtained where needed.
- S 3. The facility was found to conduct sampling of all waste streams, including type and frequency, as required in the permit.

- S 4. Sample collection procedures, including automatic sampling, include:
 - a. Samples refrigerated during compositing.
 - b. Proper preservation techniques used.
 - c. Containers and holding times conform to 40 CFR 136.3.

- S 5. Sample documentation was adequate and includes:
 - a. Dates, times, and locations of sampling.
 - b. Name of individual performing sampling.
 - c. Instantaneous flow for flow-weighted aliquots.
 - d. Chain of Custody records.

S 6. NPDES Permit Total Toxic Organic (TTO) requirements were being met.

N 7. NPDES Permit Whole Effluent Toxicity (WET) testing requirements were being met.

Comments:

All sampling practices are conducted accurately and at the frequency required by the permit. The composite sample is collected with an automatic sampler which is connected to the flow meter.

TTO testing is completed twice annually. The development of a Solvent Management Plan was discussed during the inspection.

Flow Measurement:

S 1. Flow was found to be properly monitored as required by the permit.

S 2. Flow data and calibration records were available for review, and document that monitoring equipment has been calibrated at the frequency required in the permit.

Comments:

The facility's flow measurement program, including all documentation, is adequate and representative. The effluent flow meter was last calibrated in January 2024.

Laboratory:

The following laboratory records were reviewed:

pH Bench Sheets Contract Lab Reports Chain-of-Custody

- N 1. The laboratory practices and protocol reviewed were adequate, including:
 - a. A written laboratory QA/QC manual was available.
 - b. Samples were found to be properly stored.
 - c. Approved analytical methods were used.
 - d. Calibration and maintenance of instruments was adequate.
 - e. QA/QC procedures were adequate.
 - f. Dates of analyses (and times, where required) were recorded.
 - g. Name of person performing analyses was recorded.

S 2. Review of lab records and/or on-site field testing equipment and protocols was found to be adequate.

Contract Lab Information

Element Laboratory

Comments:

The pH bench sheets and contract laboratory records reviewed during the inspection appeared to be accurate and complete. The pH meter is 3 point calibrated daily and the calibration is well documented. The pH standards were well within expiration.

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of June 2023 to May 2024 were reviewed as part of the inspection.

S 1. All facility records for the period including the previous three years were available for review.

- S 2. DMRs and MMRs were completed properly and accurately including:
 - a. "No Ex" column was accurate.
 - b. Signatory requirements were met.
 - c. Reports were prepared by or under the direction of a certified operator.

N 3. Bypass and Noncompliance reporting are adequate.

Comments:

The requested records were available and appear complete and accurate.

Enforcement:

N 1. Agreed Order compliance milestones have been met.

Comments:

The facility is not in enforcement.

Effluent Limits Compliance:

Yes 1. Were DMRs reviewed as part of the inspection?

DMRs for the period of June 2023 to May 2024 were reviewed as part of the inspection.

No 2. Were violations noted during the review of DMRs?

Comments:

No effluent violations were reported during the period reviewed.

IDEM REPRESENTATIVE

Inspector Name:

Email:

Phone Number:

Lynn Stackhouse

lstack@idem.IN.gov

317-691-0099

IDEM MANAGER REVIEW

IDEM Manager:

Date:

James E. Weingart

6/20/2024