



Indiana Department of Environmental Management

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Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

June 21, 2024

Via Email to: DMoody@flexngate.com
Mr. David Moody, Plant Manager
MasterGuard Corporation (Flex-N-Gate)
1200 E. 8th St.
Veedersburg, Indiana 47987

Dear Mr. Moody:

Re: Inspection Summary/ Noncompliance Letter
MasterGuard Corporation (Flex-N-Gate)
NPDES Permit No. INP000188
Veedersburg, Fountain County

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

Date(s) of Inspection: June 19, 2024
Type of Inspection: Complaint Investigation (#112972)
Inspection Results: Violations were observed.

The following concerns were noted:

1. IDEM received an anonymous complaint on June 17, 2024 regarding problems with the pretreatment system. Based on observations from this complaint investigation, operation was rated as unsatisfactory.

Operational logs and process control logs reviewed indicated that a Nickel tank dump from the production line on 6/15/2024 caused treatment efficiency issues at the WWTP and overflowed a treatment tank. Also, routine process control and operator logs are missing for the Sunday night (6/16/2024) shift from 7:00 PM to 7:00 AM. Based on the information reviewed, it does not appear that the treatment system was properly manned or monitored during that time. During the inspection, it appeared that a tank overflow had occurred due to trash and debris accumulation at the pretreatment system sump.

When inspectors were made aware of the complaint, a call was made to the POTW to ascertain if any anomalies were noted at the POTW. The POTW had taken a composite sample that appeared to be abnormal (see photo). This sample is being sent to the POTW's contract lab for analysis.

During this complaint investigation, inspectors also evaluated the Chrome evaporators. The facility is still only running one evaporator for both Chrome plating lines. The second evaporator is in the process of being installed. While only one evaporator is running, some Chromium is not being fully recovered due to too much load from the production lines. This appears to be causing over saturation of Chromium in the plating rinse tanks that overflows/draws out into the wastewater that is sent to the pretreatment system.

Part II. A. 9. of the permit requires that all facilities and systems (and related appurtenances) for collection and treatment that are installed or used by the permittee and necessary for achieving compliance with the terms and conditions of the permit in accordance with 327 IAC 5-2-8(9) must be maintained in good working order and efficiently operated at all times.

2. The Self Monitoring Program was rated as unsatisfactory. Part I. C. 1. of the permit states that samples and measurements taken as required herein shall be representative of the volume and nature of the entire permitted discharge. Based on EPA guidance for operating procedures for wastewater sampling, at the end of the compositing period, the sample collected should be properly mixed and transferred into the respective containers, followed by immediate preservation, if required. Based on a description of sampling procedures from staff, deliberate mixing of the sample does not occur prior to being transferred into the sampling bottles. In addition, the person taking sample container from the auto-sampler pours a small amount of sample off the top of sampling container before pouring into smaller sample containers. No sample can be poured off the sample container and the entire sample must be adequately mixed to provide a homogeneous representative sample.

3. The Records/Reports evaluation generated an unsatisfactory rating. The facility made errors on the number of exceedances (# of Ex.) in Net DMR for January and February 2024. The exceedances total on the DMR must include all daily maximum and monthly average exceedances. An accurate accounting of exceedances can be found under the Effluent Limits Compliance portion of this report.

4. The Effluent Limits Compliance area was rated unsatisfactory due to the following self-reported violations of the limits detailed in Part I. A. of the the NPDES Permit:

Month	Year	Outfall	Parameter	Number
January	2024	002	Nickel	2
January	2024	002	Chromium	4
February	2024	002	Chromium	2

In addition to the reported exceedances above, the Town of Veedersburg issued a violation letter dated June 6, 2024 for exceedances observed from samples they obtained in May 2024. These resulted in three exceedances of the Chromium Daily Maximum.

Part II. A. 1. of your permit requires you to comply with its terms and conditions. Any noncompliance with the terms of your permit may subject you to an enforcement action which can include the imposition of penalties. You are required to immediately take all necessary measures to comply with the terms and conditions of your NPDES Permit, specifically those violations identified above.

Within 30 days of receipt of this letter, a written detailed response documenting correction of the concerns listed above and/or a plan for assuring future compliance must be submitted to this office. Failure to respond adequately to this letter may result in formal enforcement action. Please direct your response to this letter to our letterhead address or via email to wwViolationResponse@idem.IN.gov. Any questions should be directed to Holly Zurcher at 317-954-8028 or by email to hzurcher@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,

Handwritten signature of Kim Rohr in black ink, consisting of stylized initials 'KR' followed by a surname 'Rohr'.

Kim Rohr, Chief
Wastewater Inspection Section
Office of Water Quality

Enclosure

This sample is being sent to the POTW's contract lab for analysis.

During this complaint investigation, inspectors also evaluated the Chrome evaporators. The facility is still only running one evaporator for both Chrome plating lines. The second evaporator is in the process of being installed. While only one evaporator is running, some Chromium is not being fully recovered due to too much load from the production lines. This appears to be causing over saturation of Chromium in the plating rinse tanks that overflows/draws out into the wastewater that is sent to the pretreatment system.

Part II. A. 9. of the permit requires that all facilities and systems (and related appurtenances) for collection and treatment that are installed or used by the permittee and necessary for achieving compliance with the terms and conditions of the permit in accordance with 327 IAC 5-2-8(9) must be maintained in good working order and efficiently operated at all times.

Self-Monitoring:

Comments:

The Self Monitoring Program was rated as unsatisfactory. Part I. C. 1. of the permit states that samples and measurements taken as required herein shall be representative of the volume and nature of the entire permitted discharge. Based on EPA guidance for operating procedures for wastewater sampling, at the end of the compositing period, the sample collected should be properly mixed and transferred into the respective containers, followed by immediate preservation, if required. Based on a description of sampling procedures from staff, deliberate mixing of the sample does not occur prior to being transferred into the sampling bottles. In addition, the person taking sample container from the auto-sampler pours a small amount of sample off the top of sampling container before pouring into smaller sample containers. No sample can be poured off the sample container and the entire sample must be adequately mixed to provide a homogeneous representative sample.

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of January 2024 to April 2024 were reviewed as part of the inspection.

Comments:

The Records/Reports evaluation generated an unsatisfactory rating. The facility made errors on the number of exceedances (# of Ex.) in Net DMR for January and February 2024. The exceedances total on the DMR must include all daily maximum and monthly average exceedances. An accurate accounting of exceedances can be found under the Effluent Limits Compliance portion of this report.

Effluent Limits Compliance:

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

DMRs for the period of January 2024 to April 2024 were reviewed as part of the inspection.

Yes 2. Were violations noted during the review of DMRs?

The Effluent Limits Compliance area was rated unsatisfactory due to the following self-reported violations of the limits detailed in Part I. A. of the NPDES Permit:

Month	Year	Outfall	Parameter	Number
January	2024	002	Nickel	2
January	2024	002	Chromium	4
February	2024	002	Chromium	2

Comments:

In addition to the reported exceedances above, the Town of Veedersburg issued a violation letter dated June 6, 2024 for exceedances observed from samples they obtained in May 2024. These resulted in three exceedances of the Chromium Daily Maximum.

IDEM REPRESENTATIVE

Inspector Name: Holly Zurcher	Email: hzurcher@idem.IN.gov	Phone Number: 317-954-8028
Other staff participating in the inspection: Name(s) Maggie Kroeger	Phone Number(s) 317-619-3639	

IDEM MANAGER REVIEW

IDEM Manager: Kim Rohr	Date: 6/21/2024
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Inspection Photographs



Facility: MasterGuard Corporation (Flex-N-Gate)		Location/Description: Floor staining and debris around sump appear that a tank overflow recently occurred. According to staff, this sump directs flow back to the EQ tanks. However, the EQ tanks may not be properly sized for the EQ needs of this facility. Several tanks were full at the time of this inspection. The facility should have sufficient EQ capacity for process slugs and spills to protect the pretreatment system and the POTW.
Photographer: Holly Zurcher		
Date: 06/19/2024	Time:	
Others Present:		



Facility: MasterGuard Corporation (Flex-N-Gate)		Location/Description: Picture taken by POTW of sample from MasterGuard's sampling location at Outfall 002 on June 18, 2024. Photo quality is blurry but a noticeable yellow tint is present.
Photographer: Holly Zurcher		
Date: 06/18/2024	Time:	
Others Present:		