



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian Rockensuess
Commissioner

June 25, 2024

Via Email to: venturini@dot-coatingusa.com

Mr. Michael Venturini, President
DOT America, Inc.
335 Towerview Drive
Columbia City, Indiana 46725

Dear Mr. Venturini:

Re: Inspection Summary Letter
DOT America, Inc.
NPDES Permit No. INP000711
Columbia City, Whitely 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 25, 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: INP000711		Facility Type: Industrial		Facility Classification: Minor		Facility Classification: A-SO		TEMPO AI ID			
Date(s) of Inspection:		June 25, 2024									
Type of Inspection: Compliance Evaluation Inspection											
Name and Location of Facility Inspected: DOT America, Inc. 335 Towerview Drive Columbia City IN 46725					County: Whitely			Receiving Waters/POTW: Columbia City WWTP		Permit Expiration Date: 12/31/2025	
								Design Flow: NA			
On Site Representative(s):											
First Name		Last Name		Title		Email		Phone			
Caleb		Ledger		Process Engineer/HSE Coordinator		ledger@dot-coatingusa.com		260-244-5700			
Rochelle		Richardson		Purchasing/Account Manager		richardson@dot-coatingusa..com		260-244-5700			
Stephanie		Martinez		Office Manager/HR Generalist		martinez@dot-coatingusa.com		260-244-5700			
Was a verbal summary of the inspection given to the on-site rep? Yes											
Certified Operator: Robert Kahle		Number: 21449	Class: C	Effective Date: 7-1-23	Expiration Date: 6-30-26	Email: b.kahle@sesadvantage.com					
Cyber Security Contact											
Name:		Email:									
Responsible Official: Mr. Michael Venturini, President 335 Towerview Drive Columbia City, Indiana 46725					Permittee: DOT America, Inc.		Email: venturini@dot-coatingusa.com				
					Phone:		Contacted?				
					Fax:		No				
INSPECTION FINDINGS											
<input checked="" type="radio"/> Conditions evaluated were found to be satisfactory at the time of the inspection. (5) <input type="radio"/> Violations were discovered but corrected during the inspection. (4) <input type="radio"/> Potential problems were discovered or observed. (3) <input type="radio"/> Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2) <input type="radio"/> Violations were discovered and may subject you to an appropriate enforcement response. (1)											
AREAS EVALUATED DURING INSPECTION											
<i>(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)</i>											
N	Receiving Waters	S	Facility/Site	S	Self-Monitoring	N	Enforcement				
N	Effluent/Discharge	S	Operation	S	Flow Measurement						
S	Permit	S	Maintenance	S	Laboratory	S	Effluent Limits Compliance				
		N	Sludge	S	Records/Reports	N	Other:				
DETAILED AREA EVALUATIONS											
Receiving Waters:											
<input checked="" type="radio"/> 1. The receiving stream was visibly free of excessive deposits of settled solids, floating debris, oil, scum, or billowy foam.											
Comments: The facility discharges to the City of Columbia City sanitary sewer system.											
Effluent/Discharge:											
<input checked="" type="radio"/> 1. Final effluent was essentially free of excessive solids, floating debris, oil, scum, or billowy foam.											
<input checked="" type="radio"/> 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 facility was not discharging at the time of the inspection.

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.

Facility/Site:

- S 1. The facility was found to have standby power or equivalent provision, if required.
N 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 processes the surfaces of medical devices. Metal treatment processes include PVD coatings, titanium plasma spray, titanium anodizing, passivation, and electro-polishing. All processes are located in individual areas and easily accessible. All treatment lines flow to a common tank where pH is adjusted if necessary.

Operation:

- S 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.
N 3. Solids handling procedures were adequate.
N 4. Documentation of solids removal, handling, and disposal was adequate.

Comments:

Each process line is monitored when in use and prior to being drained to the final pH adjustment tank. Each cleaning, plating, and rinse tank, in all lines, is marked with a tank cleaning schedule. No operational issues were noted in any workspace. The only treatment provided to the wastestream is pH adjustment.

Maintenance:

- N 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 overall maintenance of the process treatment areas appears very good. A new final pH adjustment tank has been installed and little to no maintenance is required.

Sludge:

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

Comments:

No sludge is generated in the pH adjustment tank. Any settled/removed solids in the metal coating process tanks are hauled off site for disposal.

Self-Monitoring:

- S 1. Samples were found to be taken at pre-designated locations and were found to be representative.
N 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. All required samples are grab samples. The Chain of Custody serves as the sample log for metals testing and the on-site pH testing date/time/person is well documented. TTO sampling was completed twice in 2023 as required. The development of a Solvent Management Plan was discussed and likely will be completed with the 2025 permit renewal.

Flow Measurement:

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

N 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:

Effluent is discharged in 200 gallon batches. The effluent flow meter was last calibrated in December 2023.

Laboratory:

The following laboratory records were reviewed:

Contract Lab Reports Chain-of-Custody pH Bench Sheets

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

CF Environmental

Ft. Wayne, IN

Comments:

The pH bench sheets and contract laboratory records reviewed during the inspection appeared to be accurate and complete. The pH meter is calibrated daily using fresh buffers. The sample collection/analysis and calibration information is very well documented. The buffer solutions were well within expiration.

Records/Reports:

The following records/reports were reviewed:

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

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

Comments:

No effluent limitation 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

6/25/2024