



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

VIA ELECTRONIC MAIL

May 30, 2024

Chris Broome, President
Draper, Inc.
411 South Pearl Street
Spiceland, IN 47385

Dear Mr. Broome:

Re: Final IWP Permit No. INP000738
Draper, Inc.
Spiceland, IN - Henry County

Your application for an Industrial Wastewater Pretreatment (IWP) Permit has been processed in accordance with the Indiana Department of Environmental Management's (IDEM) permitting authority under IC 13-15 (formerly IC 13-7-10) and the provisions of 327 IAC 5-21. The enclosed IWP permit covers the discharge from your facility into the South Henry Regional Waste District Publicly Owned Treatment Works. All discharges from this facility shall be consistent with the terms and conditions of this permit.

One condition of your permit requires periodic reporting of several effluent parameters. You are required to submit both federal discharge monitoring reports (DMRs) and state Monthly Monitoring Reports (MMRs) on a routine basis. The MMR form is available on the internet at the following web site:
<https://www.in.gov/idem/cleanwater/wastewater-compliance/wastewater-reporting-forms-notice-and-instructions/>.

Once you are on this page, select the "IDEM Forms" page and locate the "Monthly Monitoring Report (MMR) for Industrial Discharge Permits-30530" under the Wastewater Facilities heading. We recommend selecting the "XLS" version because it will complete all of the calculations when you enter the data.

All NPDES permit holders are required to submit their monitoring data to IDEM using NetDMR. Information on NetDMR is available on the IDEM website at <https://www.in.gov/idem/cleanwater/resources/netdmr/>.

Another condition, which needs to be clearly understood, concerns violation of the effluent limitations in this permit. Exceeding the limitations constitutes a violation of the permit and may subject the permittee to criminal or civil penalties. See Part II.B.8 of this permit for further details. It is very important for your office and treatment plant operator to understand this part of the permit.

Chris Broome, President

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The draft IWP permit for Draper Inc. was made available for public comment from April 2, 2024 through May 2, 2024 as part of Public Notice No. 20240402 – INP000738 – D on IDEM's website at <https://www.in.gov/idem/public-notices/public-notices-all-regions/>. During this comment period, no comment letters were received.

It should also be noted that any appeal must be filed under procedures outlined in IC 13-15-6, IC 4-21.5, and the enclosed Public Notice. The appeal must be initiated by filing a petition for administrative review with the Office of Environmental Adjudication (OEA) within fifteen (15) days of the emailing of an electronic copy of this letter or within eighteen (18) days of the mailing of a certified copy of this letter by filing at the following addresses:

Director
Office of Environmental Adjudication
Indiana Government Center North
Room N103
100 North Senate Avenue
Indianapolis, Indiana 46204

Commissioner
Indiana Department of Environmental Management
Indiana Government Center North
Room 1301
100 North Senate Avenue
Indianapolis, Indiana 46204

If you have any questions concerning the permit, please contact Ms. Devery J. DeBoy at 317/232-8701 or by email at DDeboy@idem.in.gov. More information on the appeal review process is available at the website for the Office of Environmental Adjudication at <http://www.in.gov/oea>.

Sincerely,



Jerry Dittmer, Chief
Permits Branch
Office of Water Quality

Enclosures

cc: Henry County Health Department
Carrie Andecover, EHS Manager
Brian Mayne, South Henry Regional Waste District WWTP
Leigh Voss, IDEM
Andy Schmidt, IDEM

STATE OF INDIANA

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AUTHORIZATION TO DISCHARGE UNDER THE
INDUSTRIAL WASTEWATER PRETREATMENT PROGRAM

INDUSTRIAL WASTEWATER PRETREATMENT (IWP) PERMIT

In accordance with 327 IAC 5-21 and IDEM's permitting authority under IC 13-15, Draper, Inc. (hereinafter referred to as the permittee) is authorized to discharge from the facility located at 411 South Pearl Street, Spiceland, Indiana, into the South Henry Regional Waste District Publicly Owned Treatment Works (POTW), in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in Parts I and II hereof.

EFFECTIVE DATE: June 1, 2024

EXPIRATION DATE: May 31, 2029

NOTE: In order to receive authorization to discharge beyond the date of expiration, the permittee must submit a renewal IWP permit application to the Industrial NPDES Permit Section in the Office of Water Quality, no later than one hundred and eighty (180) days prior to the date this permit expires. Failure to do so will result in expiration of the authorization to discharge.

Issued on May 30, 2024 for the Indiana Department of Environmental Management.



Jerry Dittmer, Chief
Permits Branch
Office of Water Quality

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit, the permittee is authorized to discharge from Outfall 001[1][2]. Outfall 001 is located at the Stage 2 holding tank at the end of all process wastestreams. Such discharge shall be limited and monitored by the permittee as specified below:

Table 1

Parameter	Discharge Limitations		Monitoring Requirements		
	Daily Maximum	Monthly Average	Unit	Measurement Frequency[4]	Sample Type [5]
Flow [6]	Report	Report	MGD	Daily	24-Hr. Total
Cadmium [Cd] [3]	0.11 [9]	0.07 [9]	mg/l	1 X Weekly	24-Hr. Comp
T. Chromium [Cr] [3]	2.77 [9]	1.71 [9]	mg/l	1 X Weekly	24-Hr. Comp
Copper [Cu] [3]	3.38 [9]	2.07 [9]	mg/l	1 X Weekly	24-Hr. Comp
Lead [Pb] [3]	0.69 [9]	0.43 [9]	mg/l	1 X Weekly	24-Hr. Comp
Nickel [Ni] [3]	3.98 [9]	2.38 [9]	mg/l	1 X Weekly	24-Hr. Comp
Silver [Ag] [3]	0.43 [9]	0.24 [9]	mg/l	1 X Weekly	24-Hr. Comp
Zinc [Zi] [3]	2.61 [9]	1.48 [9]	mg/l	1 X Weekly	24-Hr. Comp
Total Cyanide [CN(T)] [10]	1.20 [9]	0.65 [9]	mg/l	1 X Weekly	Grab
TTO [11]	2.13 [9]	-----	mg/l	2 X Yearly	Grab

Table 2

Parameter	Quality or Concentration		Monitoring Requirements		
	Daily Minimum	Daily Maximum	Units	Measurement Frequency	Sample Type
pH [7]	5.0 [8]	-----	s.u.	Daily	Grab

- [1] Outfall 001 shall be designated as process wastewaters and contains no dilution streams.
- [2] The discharge shall not exceed the local limits in the Sewer Use Ordinance upon entering the POTW.
- [3] All metals shall be analyzed as Total Recoverable Metals.
- [4] Parameters that are to be monitored twice per year shall be reported during the months of June and December. If, however, two other months are more appropriate, the permittee may request to report in two alternate months, or the State may require the permittee to report during two alternate months.
- [5] A “24-hour composite sample” means a sample consisting of at least 3 individual flow-proportional samples of wastewater, consisting of aliquots withdrawn throughout the 24-hour discharge period. The aliquots may be: (i) uniform

aliquots withdrawn at uniform flow intervals; (ii) flow-proportional aliquots withdrawn at uniform time intervals; or (iii) for batch discharge, uniform aliquots withdrawn from uniform batch volumes. A flow-proportioned composite sample may be obtained by:

- (1) recording the discharge flow rate at the time each individual sample is taken,
- (2) adding together the discharge flow rates recorded from each individual's sampling time to formulate the "total flow" value,
- (3) the discharge flow rate of each individual sampling time is divided by the total flow value to determine its percentage of the total flow value,
- (4) then multiply the volume of the total composite sample by each individual sample's percentage to determine the volume of that individual sample which will be included in the total composite sample.

Alternatively, a 24-hour composite sample may be obtained by an automatic sampler on an equal time interval basis over a twenty-four hour period provided that a minimum of 24 samples are taken and combined prior to analysis. The samples do not need to be flow-proportioned if the permittee collects samples in this manner.

- [6] The flow must be measured and recorded using valid flow measurement devices, not estimated. The flow monitoring device must be calibrated at least once every twelve (12) months.
- [7] If the permittee collects more than one grab sample on a given day for pH, the values shall not be averaged for reporting daily maximums or daily minimums. The permittee must report the individual minimum and the individual maximum pH value of any sample during the month on the Monthly Monitoring Report form.
- [8] Based on National pretreatment standards: Prohibited discharges [40 CFR 403.5] and Pretreatment standards for prohibited discharges [327 IAC 5-18-2].
- [9] Based on categorical standards [40 CFR 433.17]. The Standard is concentration-based (mg/l).
- [10] The CN(T) parameter includes all cyanide, chelated (bound to heavy metals) and unchelated (free). The Metal Finishing Standard for CN(T) applies only to the CN-bearing flows prior to mixing with the non-CN Metal Finishing flows.
- [11] The Total Toxic Organics (TTO) parameter is defined as the sum of all the quantifiable concentration values above .01 mg/l for the toxic organic compounds that constitute this parameter under the applicable categorical standard. See Part I.D. ("TTO MONITORING REQUIREMENTS") of this permit.

2. ADDITIONAL DISCHARGE PROHIBITIONS

The permittee shall not allow the introduction of the following into the POTW from any location, including Outfall 001:

- a. A pollutant from any source of nondomestic wastewaters that could pass through or cause interference with the operation or performance of the POTW.
- b. A pollutant that could create a fire or explosion hazard in the POTW, including waste streams with a closed cup flashpoint of less than 140° F degrees Fahrenheit (60° C) using the test methods in 40 CFR 261.21.
- c. A pollutant that could cause corrosive structural damage to the POTW, including a discharge with pH lower than five (5.0), unless the POTW is specifically designed to accommodate such a discharge.
- d. A solid or viscous pollutant in an amount that could cause obstruction to the flow in a sewer or other interference with the operation of the POTW.
- e. A pollutant, including an oxygen demanding pollutant (such as biochemical oxygen demand) released in a discharge at a flow rate or pollutant concentration that could cause interference in the POTW.
- f. Heat in an amount that could:
 - (1) inhibit biological activity in the POTW and result in interference or damage to the POTW; or
 - (2) exceed 40° C or 104° F at the POTW treatment plant unless the commissioner, upon request of the POTW, approves alternate temperature limits.
- g. Petroleum, oil, non-biodegradable cutting oil, or products of mineral oil origin in an amount that could cause interference or pass through.
- h. A pollutant that could result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems.
- i. A trucked or hauled pollutant, except:
 - (1) with the permission of the POTW; and
 - (2) when introduced to the POTW at a discharge point designated by the

POTW.

3. AFFIRMATIVE DEFENSE

The permittee shall have an affirmative defense in any action brought against the permittee alleging a violation of the prohibitions established in Part I.A.2 of this permit if the permittee can demonstrate that:

- a. it did not know or have reason to know that its discharge, alone or in conjunction with a discharge from another source, would cause pass through or interference; and
- b. a local limit designed to prevent pass through or interference in accordance with Part I.A.2 of this permit:
 - (1) was developed for each pollutant in the permittee's discharge that caused pass through or interference, and the permittee was in compliance with each such local limit directly prior to and during the pass-through or interference; or
 - (2) was not developed for the pollutant that caused the pass through or interference, and the permittee's discharge, directly prior to and during the pass through or interference, had not changed substantially in nature or constituents from its usual discharge condition when the POTW was regularly in compliance with the applicable:
 - (A) NPDES permit requirements; and
 - (B) requirements for sewage sludge use or disposal, in the case of interference.

B. DEFINITIONS

1. Daily Discharge

The total mass of a pollutant discharged during the calendar day or, in the case of a pollutant limited in terms other than mass pursuant to 327 IAC 5-2-11(e), the average concentration or other measurement of the pollutant specified over the calendar day or any twenty-four (24) hour period that reasonably represents the calendar day for the purposes of sampling.

2. Daily Maximum (Discharge) Limitation

The maximum allowable daily discharge for any calendar day.

3. Monthly Average Discharge (Average Monthly Discharge)

The total mass or flow-weighted concentration of all daily discharges sampled or measured during a calendar month on which daily discharges are sampled and measured, divided by the number of daily discharges sampled and/or measured during such month.

4. Monthly Average (Discharge) Limitation

The highest allowable average monthly discharge for any calendar month.

5. Interference

a. "Interference" means a discharge that, alone or in conjunction with a discharge or discharges from other sources inhibits or disrupts the:

(1) treatment processes or operations;

(2) sludge processes; or

(3) selected sludge:

(A) use; or

(B) disposal methods;

of a POTW.

b. The inhibition or disruption under subsection (a) must:

(1) cause a violation of a requirement of the POTW's NPDES permit, including an increase in the magnitude or duration of a violation; or

(2) prevent the use of the POTW's sewage sludge or its sludge disposal method selected in compliance with the following statutory provisions, regulations, or permits issued thereunder or more stringent state or local regulations:

(A) Section 405 of the Clean Water Act (33 U.S.C. 1345).

(B) The Solid Waste Disposal Act (SWDA) (42 U.S.C. 6901), including:

(i) Title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA); and

(ii) the rules contained in a state sludge management plan prepared pursuant to Subtitle D of the SWDA (42 U.S.C. 6941).

(C) The Clean Air Act (42 U.S.C. 7401).

(D) The Toxic Substances Control Act (15 U.S.C. 2601).

6. Pass-through

“Pass through” means a discharge proceeding through a POTW into waters of the state in quantities or concentrations that, alone or in conjunction with a discharge or discharges from other sources, are a cause of a violation of any requirement of the POTW’s NPDES permit, including an increase in the magnitude or duration of a violation.

7. Pretreatment requirements

“Pretreatment requirements” means any substantive or procedural requirement related to pretreatment, other than a pretreatment standard, imposed on an industrial user.

8. Pretreatment standards

“Pretreatment standards” means:

- a. state pretreatment standards as established in 327 IAC 5-18-8;
- b. pretreatment standards for prohibited discharges, as established in 327 IAC 5-18-2; and
- c. national categorical pretreatment standards incorporated by reference in 327 IAC 5-2-1.5.

9. Publicly Owned Treatment Works (“POTW”)

A treatment works as defined by Section 212(2) of the Clean Water Act owned by the State or a municipality (as defined by Section 502(4) of the Clean Water Act), except that it does not include pipes, sewers or other conveyances not connected to a facility providing treatment. The term includes any devices and systems used in the storage, treatment, recycling and reclamation of municipal sewage or compatible industrial wastes. The term also includes sewers, pipes, and other conveyances only if they convey wastewater to a POTW treatment plant. “POTW” also means the municipality, as defined in Section 502(4) of the Clean Water Act, that has jurisdiction over the indirect discharges to and the discharges from such a treatment works.

C. MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the entire permitted discharge.

2. Reporting

The permittee shall submit monitoring reports to the Indiana Department of Environmental Management and the South Henry Regional Waste District containing results obtained during the previous month and shall be submitted no later than the 28th day of the month following each completed monitoring period. The first report shall be submitted by the 28th day of the month following the month in which this permit becomes effective. These reports shall include, but not necessarily be limited to, the Discharge Monitoring Report (DMR) and the Monthly Monitoring Report (MMR). All reports shall be submitted electronically by using the NetDMR application, upon registration, receipt of the NetDMR Subscriber Agreement, and IDEM approval of the proposed NetDMR Signatory. Access the NetDMR website (for initial registration and DMR/MMR submittal) via CDX at: <https://cdx.epa.gov/>.

If the South Henry Regional Waste District is agreeable to receiving an electronic version of the monthly reports, copies can be sent to the South Henry Regional Waste District via NetDMR. An acceptable email address for the South Henry Regional Waste District must be provided to IDEM's Compliance Data Section. Any non-NetDMR reports sent to the South Henry Regional Waste District shall be sent to the following:

Certified Operator
South Henry Regional Waste District
P.O. Box 147
Lewisville, IN 47352

The permittee shall also comply with the applicable reporting requirements of 40 CFR 403.12.

3. Monitoring Results

Requirements for test procedures shall be as follows:

- a. Test procedures identified in 40 CFR 136 shall be utilized for pollutants or parameters listed in that part, unless an alternative test procedure has been approved under 40 CFR 136.5.

- b. Where no test procedure under 40 CFR 136 has been approved, analytical work shall be conducted in accordance with the most recently approved edition of "Standard Methods for the Examination of Water and Wastewater", published by the American Public Health Association (APHA) or as otherwise specified by the commissioner in the IWP permit.
- c. Notwithstanding subdivision a., the commissioner may specify in a permit the test procedure specified in a standard or effluent limitation guideline.

4. Recording of the Monitoring Results

For each measurement or sample taken pursuant to the requirements of this permit, including the additional monitoring described under Part I.C.5., below, the permittee shall maintain records of all monitoring information and monitoring activities, including:

- a. The date, exact place and time of sampling or measurement;
- b. The person(s) who performed the sampling or measurements;
- c. The date(s) analyses were performed;
- d. The person(s) who performed the analyses;
- e. The analytical techniques or methods used; and
- f. The results of such measurements and analyses.

5. Additional Monitoring by Permittee

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Monthly Monitoring Report and the Discharge Monitoring Report. Such increased frequency shall also be indicated.

6. Records Retention

- a. All records of monitoring activities and results required by this permit (including all original strip chart recordings for continuous monitoring instrumentation and calibration and maintenance records) shall be retained at the permitted facility for a minimum of three (3) years. The three-year period shall be extended:

- (1) automatically during the course of any unresolved litigation regarding the discharge of pollutants by the permittee or regarding promulgated effluent guidelines applicable to the permittee; or
 - (2) as requested by the commissioner.
- b. The permittee shall maintain and make available to IDEM, the regional administrator, and the South Henry Regional Waste District personnel, records of disposal of all wastewater generated at the site. Such records shall include, but not be limited to, flow monitoring records, flow calibration records, and the volume and destination of all wastewater hauled off-site.

7. Additional Reporting Requirements

- a. In accordance with 327 IAC 5-16-5(g), all categorical and noncategorical industrial users shall notify the POTW immediately of all discharges that could cause problems to the POTW, including any slug loadings as defined by 40 CFR 403.5(b).
- b. In accordance with 327 IAC 5-16-5(h)(2), if sampling performed by an industrial user indicates a violation, the industrial user shall notify the control authority within twenty-four (24) hours of becoming aware of the violation. The industrial user shall also repeat the sampling and analysis and submit the results of the repeat analysis to the control authority within thirty (30) days after becoming aware of the violation.

Where the control authority has performed the sampling and analysis in lieu of the industrial user, the control authority shall perform the repeat sampling and analysis unless it notifies the industrial user of the violation and requires the industrial user to perform the repeat analysis. Resampling is not required if the control authority performs sampling at the industrial user:

- (1) at a frequency of at least once per month; or
- (2) between the time when the initial sampling was conducted and the time when the industrial user or the control authority receives the results of this sampling.

D. TTO MONITORING REQUIREMENTS

1. The Total Toxic Organics (TTO) limitation is defined as the summation of all quantifiable values greater than 0.01 mg/l for the toxic organic compounds listed in Table 1 that would reasonably be expected to be found. The sum of all values shall not exceed the TTO limitation(s) in Part I.A.

All toxic organic samples must be collected, preserved and stored in accordance with 40 CFR 136, Appendix A. Samples for volatile organics must be analyzed within 14 days of collection. Samples for semi-volatile organics, PCBs and pesticides must be extracted within 7 days of collection and analyzed within 40 days of extraction.

Toxic organics shall be analyzed using U.S. EPA methods 624 (volatile organics), 625 (semi-volatile organics) and 608 (PCBs and pesticides) in 40 CFR 136, or other equivalent methods approved by U.S. EPA. Equivalent methods must be at least as sensitive and specific as methods 624, 625 and 608.

2. Monitoring Alternative for TTO:

In lieu of monitoring for TTO, and at the discretion of the State, the permittee may make the following certification as a comment to the periodic reports required by 40 CFR 403.12(e):

“Based on my inquiry of the persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewater has occurred since filing the last discharge monitoring report. I further certify that this facility is implementing the solvent management plan submitted to the State.”

This statement must be signed by the signatory on the DMR.

In requesting that no monitoring be required, the permittee shall submit a solvent management plan that specifies to the State’s satisfaction the following conditions:

- a. The toxic organic compounds used;
- b. the method of disposal used instead of dumping, such as reclamation, contract hauling, incineration, etc.; and
- c. the procedures for assuring that toxic organics do not routinely spill or leak into the wastewater.

In requesting that no monitoring be required, the permittee shall monitor for all toxic organics listed in Table 1 at least once and submit a copy of the analytical report(s) to the State. If the permittee can demonstrate compliance with the TTO limit and chooses the certification option in lieu of monitoring, the analytical report(s) shall be conducted and submitted for State approval within six months from the effective date of this permit.

If the permittee is capable of complying with the above conditions and chooses the certification option in lieu of monitoring, a solvent management plan shall be submitted for State approval within six months from the effective date of this permit.

If it is determined that monitoring is necessary to ensure compliance with the TTO limit, the permittee need analyze only for those toxic organics which would reasonably be expected to be present in the discharge.

E. REOPENING CLAUSE

This permit shall be modified, or, alternatively, revoked and reissued, to comply with any applicable effluent limitation or standard issued or approved under Section 307(b) of the Clean Water Act, if the effluent limitation or standard so issued or approved:

1. contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
2. controls any pollutant not limited in the permit.

The permit, as modified or reissued under this paragraph, shall also contain any the requirements of the Act then applicable.

PART II

A. RESPONSIBILITIES

1. Duty to Comply

The permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act (CWA) and the Environmental Management Act (EMA) and is grounds for:

- a. enforcement action;
- b. permit termination, revocation and reissuance, or modification; or
- c. denial of a permit renewal application.

A permittee may claim an affirmative defense to a permit violation, however, if the circumstances of the noncompliance meet the criteria of an upset as defined in Part II.A.7, the provisions of Part I.A.3, or any defense as provided by local ordinance.

2. Right of Entry

The permittee shall allow the Commissioner of the Indiana Department of Environmental Management or the Commissioner's authorized representatives (including an authorized contractor acting as a representative of the Commissioner), upon the presentation of the credentials and such other documents as may be required by law:

- a. to enter upon the permittee's premises where a point source is located or where any records must be kept under the terms and conditions of this permit;
- b. to have access to and copy at reasonable times any records that must be kept under the terms and conditions of this permit;
- c. to inspect, at reasonable times:
 - (1) any monitoring equipment or method;
 - (2) any collection, treatment, pollution management, or discharge facilities; or
 - (3) practices required or otherwise regulated under the permit; and

- d. to sample or monitor, at reasonable times, any discharge of pollutants or internal wastestream (where necessary to ascertain the nature of a discharge of pollutants) for the purpose of evaluating compliance with the permit or as otherwise authorized.

3. Change in Discharge

If the permittee intends to add a pollutant not limited by this permit or increase discharge of a pollutant limited by this permit, the permittee must notify the receiving POTW and apply for a permit modification from the commissioner prior to commencing discharge containing the additional pollutant. The application for permit modification must:

- a. be completed on a form prescribed by the commissioner;
- b. be signed in accordance with 327 IAC 5-2-22(a); and
- c. be submitted to the commissioner no later than 120 days prior to the date that the permittee intends to commence discharge containing the additional pollutant.

4. Duty to Mitigate Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the POTW or to waters of the State resulting from noncompliance with the IWP permit, including such accelerated or additional monitoring necessary to determine the nature and impact of the non-complying discharge.

5. Noncompliance Notification

- a. If the permittee does not or will not be able to comply for any reason with any discharge limitation specified in this permit, the permittee shall provide the Indiana Department of Environmental Management and the South Henry Regional Waste District with the following information in writing, within twenty-four (24) hours of becoming aware of the noncompliance.

(1) a description of the discharge and cause of noncompliance.

(2) the period of noncompliance, including exact dates and times of the noncomplying event and the anticipated time when the discharge will return to compliance.

(3) steps being taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge.

The permittee may email the written notification of noncompliance to IDEM at wwreports@idem.in.gov.

- b. If the permittee has any unexpected, unintended, abnormal, or unapproved discharge from the facility into the POTW, the permittee shall comply with the spill reporting and response requirements contained in 327 IAC 2-6.1-7, including the requirement to report the discharge to IDEM and to the receiving POTW within two hours of discovery of the discharge.

6. Spills, Reporting, Containment, and Response

Notwithstanding the permittee's obligations under Part II.A.5 of this permit, the permittee shall comply with the spill reporting, containment, and response requirements in accordance with 327 IAC 2-6.1, as applicable.

7. Upset

- a. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with any pretreatment standards or requirements in 327 IAC 5-2 because of factors beyond the reasonable control of the permittee. An upset does not include:
 - (1) noncompliance to the extent caused by operational error;
 - (2) improperly designed treatment facilities;
 - (3) inadequate treatment facilities;
 - (4) lack of preventive maintenance; or
 - (5) careless or improper operation.
- b. An upset shall constitute an affirmative defense to an action brought for noncompliance with the pretreatment standards or requirements if the requirements of subsection (c) are met.
- c. In order to establish an affirmative defense of upset, the permittee must provide properly signed, contemporaneous operating logs, or other relevant evidence of the following facts:
 - (1) An upset occurred and the permittee can identify the cause of the upset.
 - (2) The facility was being operated at the time in a prudent and workmanlike manner and in compliance with applicable operation and maintenance procedures.

- (3) The permittee submitted a report, to the POTW and control authority, within twenty-four (24) hours of becoming aware of the upset or within five (5) days, if an initial verbal report of the information is given to the required authority, and the report contained the following information:
 - (A) A description of the indirect discharge and cause of noncompliance.
 - (B) The period of noncompliance, including exact dates and times or the anticipated time the noncompliance is expected to continue if it is not corrected.
 - (C) Steps being taken or planned for reducing, eliminating, and preventing recurrence of the noncompliance.
- d. In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset shall have the burden of proof.
- e. In the usual exercise of prosecutorial discretion, the control authority may review any claims that noncompliance was caused by an upset. No determinations made in the course of the review constitute the commissioner's final action subject to judicial review. The permittee will have the opportunity for a judicial determination on any claim of upset only in an enforcement action brought for noncompliance with the pretreatment standards or requirements.
- f. The permittee shall control production or all discharges to the extent necessary to maintain compliance with the pretreatment standards or requirements upon reduction, loss, or failure of its treatment facility until the facility is restored or an alternative method of treatment is provided. This requirement applies when, among other things, the primary source of power of the treatment facility is reduced, is lost, or has failed.

8. Bypass

- a. The following definitions apply throughout this permit:
 - (1) "Bypass" means the intentional diversion of waste streams from any portion of a permittee's treatment facility.
 - (2) "Severe property damage" means substantial physical damage to property, damage to the treatment facilities that causes them to become inoperable, or substantial and permanent loss of natural resources that can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

- b. The permittee may allow a bypass to occur if:
 - (1) it does not cause a violation of any pretreatment standard or requirement including discharge limitations contained in this permit; and
 - (2) it is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of Part II.A.8.c. and Part II.A.8.d. of this permit.
- c. The reporting requirements for a bypass are as follows:
 - (1) If the permittee knows in advance of the need for a bypass, it shall submit prior notice to the control authority, if possible, at least ten (10) days before the date of the bypass.
 - (2) If an unanticipated bypass exceeds a pretreatment standard or requirement including discharge limitations contained in this permit, the permittee shall give oral notice to the control authority within twenty-four (24) hours from the time the permittee becomes aware of the bypass. A written submission shall also be provided to IDEM within five (5) days of the time the permittee becomes aware of the bypass. The written submission must contain the following:
 - (A) A description of the bypass and its cause.
 - (B) The duration of the bypass, including exact dates and times and the anticipated time it is expected to continue if the bypass has not been corrected.
 - (C) The steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass.
- d. Bypass is prohibited, and an enforcement action may be taken against the permittee for a bypass unless the following are demonstrated:
 - (1) The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage.
 - (2) There were no feasible alternatives to the bypass, such as any of the following:
 - (A) The use of auxiliary treatment facilities.
 - (B) Retention of untreated wastes.

(C) Maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass that occurred during normal periods of equipment downtime or preventative maintenance.

(3) The permittee submitted notices as required under Part II.A.8.c.

(4) A planned bypass is approved in advance by IDEM after determining that the bypass will not violate Part II.A.8.d.(1) through (3).

9. Facilities Operation and Maintenance

The permittee shall at all times maintain in good working order and efficiently operate all facilities or 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 this permit in accordance with 327 IAC 5-2-8(9).

This provision does not act as an independent source of authority to set effluent limitations. Such limitations will be based on the design removal rates of installed treatment facilities only as required under this article. Nor should this provision be construed to require the operation of installed treatment facilities that are unessential for achieving compliance with the terms and conditions of the permit.

10. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed from or resulting from treatment or control of wastewaters shall be disposed of in compliance with applicable Indiana statutes and rules, including any applicable portions of 327 IAC 6.1 and 329 IAC 10.

11. Power Failures

When a power source is used to operate wastewater treatment facilities in order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

- a. provide an alternative power source sufficient to operate facilities utilized by the permittee to maintain compliance with the effluent limitations and conditions of this permit; or
- b. upon the reduction, loss, or failure of one or more of the primary sources of power to facilities utilized by the permittee to maintain compliance with the effluent limitations and conditions of this permit, the permittee shall halt, reduce, or otherwise control production and/or discharge in order to maintain

compliance with the effluent limitations and conditions of this permit.

12. Wastewater Treatment Plant and Certified Operators

Pursuant to IC 13-18-11-11 and 327 IAC 5-23-6, a permittee's wastewater treatment plant must be under the responsible charge of an operator certified by the Commissioner in a classification corresponding to the classification of the wastewater treatment plant as determined under 327 IAC 5-23-4.

A certified operator may be designated as being in responsible charge of more than one (1) wastewater treatment plant if the requirements under 327 IAC 5-23-7(b) are met. "Operator in responsible charge" is defined at 327 IAC 5-23-2(16).

Pursuant to 327 IAC 5-23-6(4)(A), the permittee shall notify IDEM when there is a change in the person serving as the certified operator in responsible charge of the wastewater treatment facility. The notification shall be made no later than thirty (30) days after a change in the operator and submitted via e-mail to the Compliance Data Section of the Office of Water Quality at WWReports@idem.IN.gov.

13. Construction Permit

The permittee shall not construct, install, or modify any water pollution control facility except in accordance with 327 IAC 3 and IC 13-14-8-11.6. Upon completion of any construction, the permittee must notify the Compliance Evaluation Section of the Office of Water Quality in writing.

14. Containment Facilities

When cyanide or cyanogen compounds are used in any of the processes at this facility the permittee shall provide approved facilities for the containment of any losses of these compounds in accordance with the requirements of 327 IAC 2-2-1.

B. ADDITIONAL RESPONSIBILITIES

1. Effect of Permit Issuance

This permit does not affect any pretreatment requirements, including any standards or prohibitions, established by local ordinance of the South Henry Regional Waste District.

2. Permit Renewal

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new IWP permit. An application for an IWP permit must conform to the following:

- a. Be completed on a form prescribed by the commissioner;
- b. Be signed in accordance with 327 IAC 5-2-22(a);
- c. Be submitted to the commissioner no later than one hundred eighty (180) days prior to the expiration date of an existing permit if the industrial user intends to continue discharging to the POTW.

3. Permit Modification

This permit may be modified in whole or in part, revoked and reissued, or terminated during its term for cause in accordance with the pertinent provisions of 327 IAC 5-2-16. The permittee must:

- a. report to the commissioner plans for or information about any activity that has occurred or will occur that would constitute cause for modification or revocation and reissuance;
- b. comply with the existing IWP permit until it is modified or reissued; and
- c. abide by the commissioner's decision:
 - (1) to modify or revoke and reissue the permit; and
 - (2) require submission of a new application as required by 327 IAC 5-21-3.

4. Permit Transferability

- a. A permit may be transferred by the permittee to a new owner or operator only if the permit has been modified or revoked and reissued under 327 IAC 5-2-16(c)(1) or 16(e)(4), to identify the new permittee and incorporate such other requirements as may be necessary under the CWA. A permit may be transferred to another person by a permittee, without modification or revocation and reissuance being required, if the following occurs:
 - (1) The current permittee notifies the commissioner at least thirty (30) days in advance of the proposed transfer date.
 - (2) A written agreement containing a specific date for transfer of permit responsibility and coverage between the current permittee and the transferee (including acknowledgment that the existing permittee is liable for violations up to that date, and that the transferee is liable for violations from that date on) is submitted to the commissioner.

- (3) The transferee certifies in writing to the commissioner intent to operate the facility without making such material and substantial alterations or additions to the facility as would significantly change the nature or quantities of pollutants discharged and thus constitute cause for permit modification under 327 IAC 5-2-16(d) . However, the commissioner may allow a temporary transfer of the permit without permit modification for good cause, e.g., to enable the transferee to purge and empty the facility's treatment system prior to making alterations, despite the transferee's intent to make such material and substantial alterations or additions to the facility.
- (4) The commissioner, within thirty (30) days, does not notify the current permittee and the transferee of the intent to modify, revoke and reissue, or terminate the permit and to require that a new application be filed rather than agreeing to the transfer of the permit.

5. Signature Requirements

- a. The reports required by Part I.C.2 of this Permit must be signed by one (1) of the following:
 - (1) A responsible corporate officer. As used in this subdivision, "responsible corporate officer" means:
 - (A) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or
 - (B) The manager of one (1) or more manufacturing, production, or operating facilities provided the manager is authorized to make management decisions that govern the operation of the regulated facility including having the explicit or implicit duty to make major capital investment recommendations, and initiating and directing other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
 - (2) A general partner or proprietor or manager if the industrial user submitting the reports is a partnership or sole proprietorship, respectively.

- (3) A duly authorized representative of the individual designated in either Part II.B.5.a.(1)(A) or Part II.B.5.a.(1)(B) of this permit if:
- (A) the authorization is made in writing by the individual described in either Part II.B.5.a.(1)(A) or Part II.B.5.a.(1)(B) of this permit;
 - (B) the authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the industrial discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and
 - (C) the written authorization is submitted to the commissioner.
- (4) If an authorization under subdivision (3) is no longer accurate because a different individual or position has responsibility for the overall operation of the facility or overall responsibility for environmental matters for the company, a new authorization satisfying the requirements of subdivision (3) must be submitted to the commissioner prior to or together with any reports to be signed by an authorized representative.
- b. A report required by this section that relates to the actual operation of or discharge from a pretreatment facility must be prepared by or under the direction of a wastewater treatment plant operator certified under IC 13-18-11, if a certified operator is required.

6. Penalties for False Reporting

In accordance with 327 IAC 5-2-8(15), Section 309(c)(4) of the Clean Water Act (U.S.C. 1319(c)(4)) provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be punished by a fine of not more than ten thousand dollars (\$10,000) per violation, or by imprisonment for not more than one hundred eighty (180) days per violation, or by both.

IC 13-30-10-1 provides that a person who knowingly or intentionally renders inaccurate or inoperative a recording device or a monitoring device required to be maintained by a permit issued by the department commits a class B misdemeanor.

7. Penalties for Tampering or Falsification

In accordance with 327 IAC 5-2-8(10), Section 309(c)(4) of the Clean Water Act (33 U.S.C. 1319(c)(4)) provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under a permit shall, upon conviction, be punished by a fine of not more than ten thousand dollars (\$10,000) per violation, or by imprisonment for not more than one hundred eighty (180) days per violation, or by both.

IC 13-30-10-1 provides that a person who knowingly or intentionally renders inaccurate or inoperative a recording device or a monitoring device required to be maintained by a permit issued by the department commits a class B misdemeanor.

8. Enforcement

a. A violation of the pretreatment rules may:

(1) subject a person causing or contributing to the violation to administrative or judicial enforcement proceedings, under IC 13-30-3, and the penalties provided under IC 13-30-4;

(2) be cause for:

(A) modification;

(B) revocation and reissuance; or

(C) termination;

of the industrial wastewater pretreatment permit; and

(3) warrant the invocation of emergency procedures under IC 13-14-10.

b. The initiation of any action in response to a violation of the pretreatment rules does not preclude initiation of any other response.

c. A violation of the pretreatment rules includes the following:

(1) The indirect discharge of pollutants in contravention of an applicable pretreatment standard or other applicable discharge limitation.

(2) The indirect discharge of pollutants without a permit from a significant industrial discharger as determined by IDEM.

(3) A violation of discharge limitations or other terms and conditions of the permit where an IWP permit is required under the pretreatment rules.

(4) Failure to comply with any other applicable pretreatment requirement.

(5) Failure to:

(A) allow entry, inspection, and monitoring by representatives of the commissioner when requested in accordance with applicable law; or

(B) carry out monitoring, recording, and reporting required under this permit.

d. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

9. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under Section 311 of the Act.

10. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights or infringement of Federal, State, or local laws or regulations.

11. Severability

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstances to held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

TABLE 1.
TOXIC ORGANICS

<p>I. ETHERS</p> <p>Ether, bis(2-chloroethyl) Ether, bis(2-chloroisopropyl) Ether, 2-chloroethyl vinyl Ether, 4-chlorophenyl phenyl Ether, 4-bromophenyl phenyl Bis (2-chloroethoxy) methane</p>	<p>V. AROMATICS</p> <p>Benzene Benzene, chloro- Benzene, 1,2-dichloro- Benzene, 1,3-dichloro- Benzene, 1,4-dichloro- Benzene, 1,2,4-trichloro- Benzene, hexachloro-; HCB Benzene, ethyl- Benzene, nitro- Toluene Toluene, 2,4-dinitro-; DNT Toluene, 2,6-dinitro-</p>
<p>II. PHTHALATES</p> <p>Phthalate, dimethyl; DMP Phthalate, diethyl; DEP Phthalate, di-n-butyl; DBP Phthalate, di-n-octyl; DOP Phthalate, bis(2-ethylhexyl); DEHP Phthalate, butyl benzyl; BBP</p>	<p>VI. POLYNUCLEAR AROMATIC HYDROCARBONS (PAHs)</p> <p>2-Chloronaphthalene Benzo (a) anthracene Benzo (b) fluoranthene; B(b)F Benzo (k) fluoranthene; B(k)F Benzo (a) pyrene; B(a)P Ideno (1,2,3-cd) pyrene; IP Dibenzo (a,h) anthracene; DBA Benzo (ghi) perylene Acenaphthene Acenaphthylene Anthracene Chrysene Fluoranthene Fluorene Naphthalene Phenanthrene Pyrene</p>
<p>III. NITROGEN COMPOUNDS</p> <p>Nitrosamine, dimethyl- Nitrosamine, diphenyl- Nitrosamine, di-n-propyl- Benzidine Benzidine, 3,3'-dichloro- Hydrazine, 1,2-diphenyl- Acrylonitrile</p>	<p>VII. PCB's</p> <p>PCB-1016; Aroclor 1016 PCB-1221; Aroclor 1221 PCB-1232; Aroclor 1232 PCB-1242; Aroclor 1242 PCB-1248; Aroclor 1248 PCB-1254; Aroclor 1254 PCB-1260; Aroclor 1260</p>
<p>IV. PHENOLS</p> <p>Phenol Phenol, 2-chloro Phenol, 2,4-dichloro-; 2,4-DCP Phenol, 2,4,6-trichloro- Phenol, pentachloro-; PCP Phenol, 2-nitro- Phenol, 4-nitro- Phenol, 2,4-dinitro-; 2,4-DNP Phenol, 2,4-dimethyl- m-Cresol, p-chloro- o-Cresol, 4,6-dinitro-; DNOC</p>	

TABLE 1.
 (CONTINUED)
TOXIC ORGANICS

VIII.	HALOGENATED HYDROCARBONS; HALOGENATED ALIPHATICS Methane, chloro-; methyl chloride Methane, dichloro-; Methylene chloride Methane, trichloro-; chloroform Methane, tetrachloro-; Carbon tetrachloride Methane, bromo-; methyl bromide Methane, dichlorobromo- Methane, chlorodibromo- Methane, tribromo-; bromoform Ethane, chloro- Ethane, 1,1-dichloro- Ethane, 1,2-dichloro- Ethane, 1,1,1-trichloro- Ethane, 1,1,2-trichloro- Ethane, 1,1,2,2-tetrachloro- Ethane, hexachloro- Ethylene, chloro-; Vinyl Chloride Ethylene, 1,1-dichloro-; 1,1-DCE Ethylene, 1,2-trans-dichloro- Ethylene, trichloro-; TCE Ethylene, tetrachloro-; Perchloroethylene Propane, 1,2-dichloro- Propylene, 1,3-dichloro- Butadiene, hexachloro-; HCBD Cyclopentadiene, hexachloro-; HCCPD	IX.	PESTICIDES alpha-Endosulfan Endosulfan sulfate beta-Endosulfan Hexachlorocyclohexanes: alpha-BHC beta-BHC gamma-BHC delta-BHC; Lindane Aldrin; HHDN Dieldrin; HEOD 4,4'-DDE 4,4'-DDT; p,p'-DDT 4,4'-DDD; p,p'-DDD; p,p'-TDE Endrin Endrin aldehyde Heptachlor Heptachlor epoxide Chlordane Toxaphene
		X.	OXYGENATED COMPOUNDS Acrolein
		XI.	MISCELLANEOUS Isophorone 2,3,7,8-tetrachlorodibenzo-p-dioxin; TCDD; dioxin



Industrial Wastewater Pretreatment (IWP)

Briefing Memo for

Draper, Inc.

Draft: March 2024

Final: May 2024

Indiana Department of Environmental Management

100 North Senate Avenue
Indianapolis, Indiana 46204

(317) 232-8603

Toll Free (800) 451-6027

www.idem.IN.gov

Permittee:	Draper, Inc. 411 South Pearl Street Spiceland, IN 47385
Existing Permit Information:	Permit Number: INP000738 Expiration Date: New permit
Facility Contact:	Carrie Andecover, EHS Manager 765-987-7999, carrie.andecover@draperinc.com
Facility Location:	411 South Pearl Street Spiceland, IN 47385 Henry County
Receiving POTW:	South Henry Regional Waste District Address City, State, ZIP NPDES Permit #IN0055131
Proposed Action:	New Permit Date Application Received: February 5, 2024
Source Category	Industrial Pretreatment
Permit Writer:	Ms. Devery J. DeBoy (317) 232-8701 DDeboy@idem.in.gov

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1.0 INTRODUCTION

The Indiana Department of Environmental Management (IDEM) received an Industrial Wastewater Pretreatment (IWP) Permit application from Draper, Inc. on February 5, 2024. A five year permit is proposed in accordance with 327 IAC 5-2-6(a).

The Federal Water Pollution Control Act of 1972 and subsequent amendments require a National Pollutant Discharge Elimination System (NPDES) permit for the discharge of wastewater to surface waters. Furthermore, Indiana Statute 13-15-1-2 requires a permit to control or limit the discharge of any contaminants into state waters or into a publicly owned treatment works (POTW). This proposed permit action by IDEM complies with both federal and state requirements.

In accordance with Title 40 of the Code of Federal Regulations (CFR) Sections 124.7 and 124.6, as well as Indiana Administrative Code (IAC) 327 Section 5, development of a Statement of Basis, or Briefing Memo, is required for NPDES permits. This document fulfills the requirements established in those regulations.

This Briefing Memo was prepared in order to document the factors considered in the development of IWP Permit effluent limitations. The technical basis for the Briefing Memo may consist of evaluations of prohibited discharge standards, categorical pretreatment standards, existing effluent quality, and receiving POTW limitations.

2.0 GENERAL

2.1 Facility Description

The permittee manufactures audio-visual screens and the components that come with them, gym equipment, and window shades for commercial and residential locations. Manufacturing processes include powder coating. The plant normally operates 22 hours/day, 7 days/week.

The waste flows from powder coating are subject to the Categorical Pretreatment Standards for New Source Metal Finishing operations [40 CFR 433.17]. The standards are concentration-based (mg/l).

2.2 Receiving POTW

The permittee discharges to the South Henry Regional Waste District: a Class II, 0.3 MGD oxidation ditch activated sludge treatment plant with bar screen, communitor with bypass screen, two (2) grit chambers, two (2) oxidation ditches, two (2) clarifiers, ultraviolet light disinfection, and post aeration. Plant design peak flow is 0.81 MGD. The POTW does not serve any other industrial contributors.

The POTW discharges to the Flatrock River (Q7,10 = 2.4 CFS), a tributary to the Flatrock-Haw Creek Watershed.

2.3 Discharge Description

The permittee discharges wastewaters from the following sources to the POTW:

<u>Source</u>	<u>Flow (GPD)</u>
Process Wastestream #1:	6,000 (1)
Sanitary:	5,818

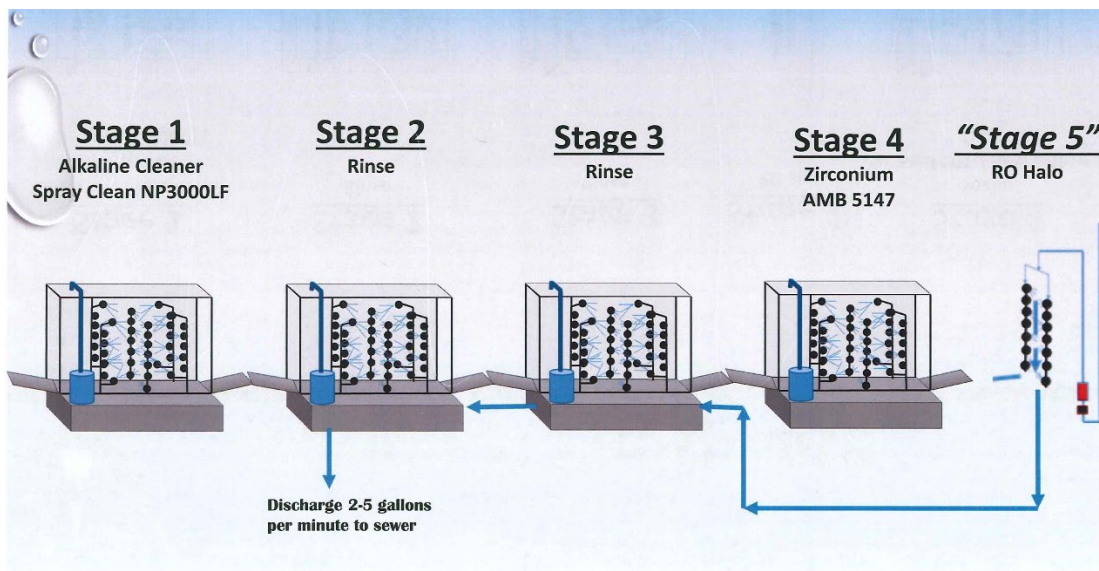
- (1) Process Wastestream #1 is wastewater from the automatic powder coating line. Stage 1 consists of alkaline cleaning, Stages 2 and 3 consist of rinsing, Stage 4 consists of the application of Zirconium AMB 5147, Stage 5 consists of the final rinse. Final rinsewater is taken back to stage 3's holding tank, then to stage 2's holding tank, where it will overflow into the sewer.

2.4 Wastewater Pretreatment

No wastewater treatment occurs at this facility. Wastewater from the existing processes at the facility is recycled several times, then hauled offsite for disposal. The new powder coating line to be installed in April 2024 will run 20 hours a day and will discharge to the South Henry Regional Waste District WWTP via Outfall 001.

A flow diagram has been included as Figure 1:

Figure 1: Flow Diagram



The permittee shall have the wastewater treatment facilities under the responsible charge of an operator certified by the Commissioner in a classification corresponding to the classification of the wastewater treatment plant as required by IC 13-18-11-11 and 327 IAC 5-23-6.

IDEM has determined that the permittee doesn't operate a wastewater treatment plant as described in 327 IAC 5-23-5.

2.5 Changes in Operation

This is a new IWP permit.

3.0 PERMIT HISTORY

3.1 Compliance History

This is a new IWP permit.

4.0 PERMIT DRAFT DISCUSSION

4.1 Selection of Parameters

This permit regulates the substances and parameters in the permittee's wastewater that are subject to New Source Metal Finishing operations [40 CFR 433.17] standards.

4.2 Selection of Limits

The permittee's discharge must comply with New Source Metal Finishing operations [40 CFR 433.17] standards that apply at the end of process and any existing local ordinance limits that apply at the end of pipe.

4.3 Self-Monitoring Frequency

Self-Monitoring frequency is determined by the pollutants present in the permittees process and compliance history.

To assure compliance with the limits and terms of this permit, State rules [327 IAC 5-21-9 and 10] require the permittee to: (i) monitor the final pretreated discharge at a minimum frequency; and (ii) report the results to this agency. To fulfill this requirement, the samples must be: (i) representative of the daily discharge; and (ii) collected, preserved and analyzed using U.S. EPA-approved materials and methods.

5.0 PERMIT LIMITATIONS

5.1 Summary of Limits and Basis for Each:

Outfall 001

The table below summarizes the permit limits at the designated sample site Outfall 001 [1][2]. Outfall 001 is located at the Stage 2 holding tank at the end of all process wastestreams.

Table 1

<u>Parameter</u>	<u>Discharge Limitations</u>			<u>Monitoring Requirements</u>	
	<u>Daily Maximum</u>	<u>Monthly Average</u>	<u>Unit</u>	<u>Measurement Frequency [4]</u>	<u>Sample Type [5]</u>
Flow [6]	Report	Report	MGD	Daily	24-Hr. Total
Cadmium [Cd] [3]	0.11 [9]	0.07 [9]	mg/l	1 X Weekly	24 Hr. Comp.
T. Chromium [Cr(T)] [3]	2.77 [9]	1.71 [9]	mg/l	1 X Weekly	24 Hr. Comp.
Copper [Cu] [3]	3.38 [9]	2.07 [9]	mg/l	1 X Weekly	24 Hr. Comp.
Lead [Pb] [3]	0.69 [9]	0.43 [9]	mg/l	1 X Weekly	24 Hr. Comp.
Nickel [Ni] [3]	3.98 [9]	2.38 [9]	mg/l	1 X Weekly	24 Hr. Comp.
Silver [Ag] [3]	0.43 [9]	0.24 [9]	mg/l	1 X Weekly	24 Hr. Comp.
Zinc [Zn] [3]	2.61 [9]	1.48 [9]	mg/l	1 X Weekly	24 Hr. Comp.
T. Cyanide [CN(T)][10]	1.20 [9]	0.65 [9]	mg/l	1 X Weekly	Grab
TTO [11]	2.13 [9]	-----	mg/l	2 X Yearly	Grab

Table 2

<u>Parameter</u>	<u>Daily Minimum</u>	<u>Daily Maximum</u>	<u>Unit</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
pH [7]	5.0 [8]	-----	s.u.	Daily	Grab

[1] Outfall 001 shall be designated as process wastewaters and contains no dilution streams.

[2] The discharge shall not exceed the local limits in the Sewer Use Ordinance upon entering the POTW.

[3] All metals shall be analyzed as Total Recoverable Metals.

[4] Parameters that are to be monitored twice per year shall be reported during the months of June and December. If, however, two other months are more appropriate, the permittee may request to report in two alternate months, or the State may require the permittee to report during two alternate months.

[5] A “24-hour composite sample” means a sample consisting of at least 3 individual flow-proportional samples of wastewater, consisting of aliquots withdrawn throughout the 24-hour discharge period. The aliquots may be: (i) uniform aliquots withdrawn at uniform flow intervals; (ii) flow-proportional aliquots withdrawn at uniform time intervals; or (iii) for batch discharge, uniform aliquots withdrawn from uniform batch volumes. A flow-proportioned composite sample may be obtained by:

- (1) recording the discharge flow rate at the time each individual sample is taken,
- (2) adding together the discharge flow rates recorded from each individual sampling time to formulate the “total flow” value,
- (3) the discharge flow rate of each individual sampling time is divided by the total flow value to determine its percentage of the total flow value,
- (4) then multiply the volume of the total composite sample by each individual sample’s percentage to determine the volume of that individual sample which will be included in the total composite sample.

Alternatively, a 24-hour composite sample may be obtained by an automatic sampler on an equal time interval basis over a twenty-four hour period provided that a minimum of 24 samples are taken and combined prior to analysis. The samples do not need to be flow-proportioned if the permittee collects samples in this manner.

[6] The flow must be measured and recorded using valid flow measurement devices, not estimated. The flow monitoring device must be calibrated at least once every twelve (12) months.

[7] If the permittee collects more than one grab sample on a given day for pH, the values shall not be averaged for reporting daily maximums or daily minimums. The permittee must report the individual minimum and the individual maximum pH value of any sample during the month on the Monthly Monitoring Report form.

[8] Based on National pretreatment standards: Prohibited discharges [40 CFR 403.5] and Pretreatment standards for prohibited discharges [327 IAC 5-18-2].

[9] Based on categorical standards [40 CFR 433.17]. The Standard is concentration-based (mg/l).

[10] The CN(T) parameter includes all cyanide, chelated (bound to heavy metals) and unchelated (free). The Metal Finishing Standard for CN(T) applies only to the CN-bearing flows prior to mixing with the non-CN Metal Finishing flows.

[11] The Total Toxic Organics (TTO) parameter is defined as the sum of all the quantifiable concentration values above .01 mg/l for the toxic organic compounds that constitute this parameter under the applicable categorical standard.

5.2 Post Public Notice Addendum

Indiana Department of Environmental Management					Search IDEM
Delaware					
Bethel-Delaware 69KV Transmission Line Rebuild	Public Notice (PDF)	05/02/2024 - 05/23/2024	Yes	IDEM ID Number: 2023-1151-18-EJW-A Corps of Engineers ID Number: LRL-2023-00982-cte Project Manager: White, Evan	
Fayette					
No current public notices.					
Franklin					
Laurel WWTP	NPDES Draft Permit Public Notice (PDF)	05/01/2024 - 05/31/2024	Yes	Permit Number: IN0040240 Project Manager: DONNELLAN, JOHN	
Henry					
Draper Inc.	NPDES Draft Permit Public Notice (PDF)	04/02/2024 - 05/02/2024	Yes	Permit Number: INP000738 Project Manager: Deboy, Devery J	
Randolph					
Town of Lynn WWTP	NPDES Final Permit Public Notice (PDF)	04/25/2024 - 05/13/2024	No	Permit Number: IN0040967 Project Manager: Kasuboski, Jordan	
Rush					
Carthage (Town) WWTP	NPDES Draft Permit Public Notice (PDF)	04/15/2024 - 05/13/2024	Yes	Permit Number: IN0024937 Project Manager: Ellerman, Nicholas	
INTAT Precision, Inc.	Notice of 30-Day Period of Public Comment for Draft Air Permit (PDF)	04/05/2024 - 05/05/2024	Yes	Permit Number: 139-47209-00011	
Union					
No current public notices.					

The draft IWP permit for Draper Inc. was made available for public comment from April 2, 2024 through May 2, 2024 as part of Public Notice No. 20240402 – INP000738 – D on IDEM’s website at <https://www.in.gov/ide/public-notices/public-notices-all-regions/>. During this comment period, no comment letters were received.

STATE OF INDIANA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
PUBLIC NOTICE NO: 20240530 – INP000738 – F
DATE OF NOTICE: May 30, 2024

The Office of Water Quality has issued the following FINAL IWP PERMIT:

MINOR – NEW:

Draper Inc, Permit No. INP000738, HENRY COUNTY, 411 South Pearl Street, Spiceland, IN. This facility manufactures audio-visual screens, gym equipment, and window shades for commercial and residential locations. The facility discharges 0.81 MGD of process wastewater to the South Henry Regional Waste District. Permit Manager: Devery DeBoy, 317/232-8701, ddeboy@idem.in.gov. Posted online at <https://www.in.gov/idem/public-notices/>.

Notice of Right to Administrative Review

If you wish to challenge this Permit, you must file a Petition for Administrative Review with the Office of Adjudication (OEA) and serve a copy of the Petition upon IDEM. The requirements for filing a Petition for Administrative Review are found in IC 4-21.5-3-7, IC 13-15-6-1 and 315 IAC 1-3-2. A summary of the requirements of these laws is provided below.

A Petition for Administrative Review must be filed with the Office of Environmental Adjudication (OEA) within fifteen (15) days of the issuance of this notice (eighteen (18) days if you received this notice by U.S. Mail), and a copy must be served upon IDEM. Addresses are:

Director
Office of Environmental Adjudication
Indiana Government Center North
100 North Senate Avenue - Room N103
Indianapolis, Indiana 46204

Commissioner
Indiana Department of Environmental Management
Indiana Government Center North
100 North Senate Avenue - Room 1301
Indianapolis, Indiana 46204

The Petition must contain the following information:

1. The name, address and telephone number of each petitioner.
2. A description of each petitioner's interest in the Permit.
3. A statement of facts demonstrating that each petitioner is:
 - a. a person to whom the order is directed.
 - b. aggrieved or adversely affected by the Permit.
 - c. entitled to administrative review under any law.
4. The reasons for the request for administrative review.
5. The particular legal issues proposed for review.
6. The alleged environmental concerns or technical deficiencies of the Permit.

7. The Permit terms and conditions that the petitioner believes would be appropriate and would comply with the law.
8. The identity of any persons represented by the petitioner.
9. The identity of the person against whom administrative review is sought.
10. A copy of the Permit that is the basis of the petition.
11. A statement identifying petitioner's attorney or other representative, if any.

Failure to meet the requirements of the law with respect to a Petition for Administrative Review may result in a waiver of your right to seek administrative review of the Permit. Examples are:

1. Failure to file a Petition by the applicable deadline.
2. Failure to serve a copy of the Petition upon IDEM when it is filed; or
3. Failure to include the information required by law.

If you seek to have a Permit stayed during the Administrative Review, you may need to file a Petition for a Stay of Effectiveness. The specific requirements for such a Petition can be found in 315 IAC 1-3-2 and 315 IAC 1-3-2.1.

Pursuant to IC 4-21.5-3-17, OEA will provide all parties with Notice of any pre-hearing conferences, preliminary hearings, hearings, stays, or orders disposing of the review of this action. If you are entitled to Notice under IC 4-21.5-3-5(b) and would like to obtain notices of any pre-hearing conferences, preliminary hearings, hearings, stays, or orders disposing of the review of this action without intervening in the proceeding you must submit a written request to OEA at the address above. More information on the appeal review process is available on the website for the Office of Environmental Adjudication at <http://www.in.gov/oea>.



**APPLICATION FOR INDUSTRIAL WASTEWATER
PRETREATMENT (IWP) PERMIT**

State Form 50271 (R2 / 9-08)

Approved by State Board of Accounts, 2008
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IDEM - Office of Water Quality
Attn: Cashier
Pretreatment Section
100 N. Senate Avenue
Indianapolis, IN 46204
Phone: (317) 232- 8603 or toll-free
1-800-451-6027 (Indiana Residents Only)
<http://www.in.gov/idem/water/permits/>

INSTRUCTIONS:

- This form must be accompanied by state form 49456. You may find state form 49456 at <http://www.in.gov/icpr/webfile/formsdiv/49456.pdf>. Both forms must be submitted together.
- Unless stated otherwise, all items are to be filled out completely. Your application will not be considered complete unless every question is answered on this form. If an item is not applicable, indicate by noting "NA" to show that you considered the question.
- Depending upon the adequacy of the data submitted for determining issuance of a permit, additional information may be required. Please read all questions and attached information prior to completing this application.
- You can fill out this form electronically, using the mouse and keyboard. Simply click inside of the first form field to begin, and advance to the next fields using the "tab" key on your keyboard, or by clicking in the fields with your mouse. Print the completed form, and submit it to IDEM, OWQ with any additional documentation in your application packet.
- A \$50 application fee is required with the submission of this form. Please enclose a check or money order payable to the Indiana Department of Environmental Management with this form and any supporting attachments and documentation, and mail the application package to the address listed in the upper-right side of this page.
- This application must be submitted in accordance with 327 IAC 5-21-3, including the time frames thereof.

Type of IWP Permit

New
 Renewal
 Modification

IWP PERMIT NUMBER

PART A: APPLICANT ADDRESS AND CONTACT(S)			
FACILITY/OPERATION			
1. Facility name: Draper, Inc.			
2. Mailing address: 411 South Pearl Street			
City: Spiceland	County: Henry	State: IN	ZIP Code: 47385
3. Facility phone number: 765-987-7999		4. Facility e-mail address (optional):	
5. Address of operation: SAME			
City:	State:	ZIP Code:	
DESIGNATED FACILITY CONTACT PERSON			
6. Designated contact name (first, last): Carrie Andecover		7. Title: EHS Manger IDEM-WATER QUALITY	
8. Mailing address: SAME FEB 05 2024			
City:	State:	ZIP Code: RECEIVED	
9. Phone number:		10. E-mail address (optional): carrie.andecover@draperinc.com	
DESIGNATED SIGNATORY AUTHORITY			
NOTE: Signatory Authorization is defined in 327 IAC 5-16-5(b)			
11. Designated signatory authority name (first, last): Chris Broome		12. Title: President	
13. Address: SAME			
City:	State:	ZIP Code:	
14. Phone number:		15. E-mail address (optional): cbroome@draperinc.com	

(Continued on page 2)

\$50
007840

RECEIVING POTW: South Henry Regional Waste District WWTP		
16. Contact Name Brian Mayne	17. Title: Superintendent	
18. Address: PO Box 147		
City: Lewisville	State: IN	ZIP Code: 47352
19. Phone number: 765-987-8432	20. E-mail address (optional): bmayne@shrwd.org	

PART B: OPERATING SCHEDULE

SHIFT INFORMATION	
21. Days of operation (check all that apply): <input checked="" type="checkbox"/> Mon. <input checked="" type="checkbox"/> Tue. <input checked="" type="checkbox"/> Wed. <input checked="" type="checkbox"/> Thu. <input checked="" type="checkbox"/> Fri. <input checked="" type="checkbox"/> Sat. <input type="checkbox"/> Sun.	
22. Hours per day of operation: 20-22 hours	
23. Number of shifts per day: 2 shifts	
24. Total number of employees per shift: Manufacturing 1st shift 350, 2nd shift 200. Office 150	
DURATION OF OPERATION	
25. Date that facility began (or will begin) operation (mm/dd/yyyy): Facility started 1902	
26. Indicate whether the operation is (will be): <input checked="" type="checkbox"/> a. Continuous throughout the year <input type="checkbox"/> b. Seasonal (check the boxes below corresponding with the months of active production) <input type="checkbox"/> Jan. <input type="checkbox"/> Feb. <input type="checkbox"/> Mar. <input type="checkbox"/> April <input type="checkbox"/> May <input type="checkbox"/> June <input type="checkbox"/> July <input type="checkbox"/> Aug. <input type="checkbox"/> Sept. <input type="checkbox"/> Oct. <input type="checkbox"/> Nov. <input type="checkbox"/> Dec.	
CLOSED-LOOP OPERATIONS	
27. Describe any closed-loop operations: Currently, we have 2 closed-loop systems with our powder coat operation. Both systems use reclaimed water until it is too dirty, then it is pumped into 275 Gallon totes, and shipped off as wastewater to a 3rd party.	
28. Does this water ever contact the product? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
29. Does the system ever discharge to the city sewer? <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No *If yes, a. How often? _____ b. How much? _____ c. Is this water pretreated? <input type="checkbox"/> Yes <input type="checkbox"/> No	

(Continued on page 3)

PART C: PROCESS DESCRIPTION

30. Describe the product(s) manufactured or service(s) provided:

Draper is broken into 3 different segments. First segment is our Audio-Visual department. This is where we manufacture audio screens, and the components that goes along with them. This can be either manual or electric. Second segment is our Gym Equipment. This is where we manufacture basketball goals, volleyball systems, gymnasium padding for basketball courts and volleyball padding. Third segment would be our shades department. This is where we manufacture shades (Manual, Electric or Solar) for residential and commercial locations.

31. Provide a detailed description of the manufacturing process(es) or service activities conducted on premises, especially those processes that involve or generate wastewater (use additional sheets if necessary).

During our process here at Draper we manufacture a lot of our own parts for different segments of the business. We also prep and powder coat our parts as well. Currently, we run our parts through a wash cycle, rinse cycle, then powder coat, and then into the oven. Our water is recycled several times before we pump this process water into 275-gallon totes, and we have it hauled off for disposal.

In April of 2024, we will be installing a new automatic powder coat line that will run 20 hours a day. This new system will be discharging to the sewer and going to the South Henry Regional Waste District WWTP. This system will be discharging 2 gallons(low) to 5 gallons (High) a minute. The prep stages of the powder coat line - Stage 1 the alkaline cleaner (Americo Spray Clean 2500) is applied, Stage 2, rinse, Stage 3, rinse, Stage 4, Zirconium AMB 5147 is applied, Stage 5, is the final rinse. Final rinse water is taken back to stage 3's holding tank, then back to stage 2's holding tank, and this is where it will overflow to the sewer. The chemicals are monitored / dispensed as needed. Then the products are powder coated and finished for assembly.

(Continued on page 4)

PART C: PROCESS DESCRIPTION (CONTINUED)

32. List chemicals and metals used in processes (raw materials):

- | | |
|--------------------------------|-----------------------|
| 1) Alkaline Cleaner Spray 2500 | 2) Zirconium AMB 5147 |
| 3) Steel | 4) Aluminum |
| 5) | 6) |
| 7) | 8) |
| 9) | 10) |
| 11) | 12) |
| 13) | 14) |
| 15) | 16) |
| 17) | 18) |
| 19) | 20) |

33. If production-based standards apply, list the amount of production (in units expressed by the standards) that passes through (or will pass through) each process that is subject to a standard (attach list if needed):

PART D: INTAKE WATER INFORMATION

34. In the table below, list intake water sources and volumes:

	SOURCE	VOLUME (GPD)
a.	Municipal Water System* *Specify City: <u>Spiceland</u>	5,108
b.	Private Well	
c.	Surface water	
d.	Other** **Specify: _____	

(Continued on page 5)

PART E: WATER LOSS INFORMATION

35. For the following items, provide the average volume of discharge or water loss (GPD).

a. Natural outlet or storm sewer: _____ GPD

i) Do you have an NPDES permit for the discharge to the Natural Outlet or Storm Sewer?

Yes* No

ii) *If yes, provide the permit number: _____

b. Waste hauler: 16.60 GPD 22 totes a yr. GPD

c. Evaporation: _____ GPD

d. Contained in product: _____ GPD

e. Other*: _____ GPD

*Specify:

PART F: WASTEWATER DISCHARGE(S) TO SANITARY OR COMBINED SEWERS

36. For each line to the municipal sewer, list average wastewater discharge (actual, expected or potential - please specify by checking the appropriate box) from the following sources prior to pretreatment (if any). With a checkmark, indicate the Outfall to which the waste-stream discharges (if there are additional outfalls, please attach additional copies of this page of the form):

	Source	WW Discharge Volume (GPD)	Volume Based On (Check One)	Outfall #1	Outfall #2	Outfall #3
a.	Process Waste-stream #1	6,000	<input type="checkbox"/> Actual Volume <input checked="" type="checkbox"/> Expected Volume	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	Process Waste-stream #2		<input type="checkbox"/> Actual Volume <input type="checkbox"/> Expected Volume	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	Process Waste-stream #3		<input type="checkbox"/> Actual Volume <input type="checkbox"/> Expected Volume	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	Pretreatment Discharge (if any)		<input type="checkbox"/> Actual Volume <input type="checkbox"/> Expected Volume	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	Boiler Blowdown		<input type="checkbox"/> Actual Volume <input type="checkbox"/> Expected Volume	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f.	Non-contact Cooling Water (once through)		<input type="checkbox"/> Actual Volume <input type="checkbox"/> Expected Volume	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g.	Sanitary Water	5,818	<input checked="" type="checkbox"/> Actual Volume <input type="checkbox"/> Expected Volume	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h.	Other Specify: _____		<input type="checkbox"/> Actual Volume <input type="checkbox"/> Expected Volume	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Include an attachment describing how each flow (36 a.-h. above) is generated

(Continued on page 6)

PART G: WASTEWATER DISCHARGE(S) TO SANITARY OR COMBINED SEWERS (DETAILS)

37. Is the discharge to the sewer?

- a. Continuous
 b. batch*

*If batch discharge,

i) Provide the frequency of discharge occurrence:

ii) What is the average volume (in gallons) of each batch?

38. Do you have, or plan to have, automatic sampling equipment or continuous wastewater flow metering equipment at this facility?

- a. Flow metering equipment Yes¹ No N/A
b. Sampling equipment Yes¹ No N/A

39. If "Yes" for item #38a or #38b, describe the type of flow meter(s) and sampling equipment.

We plan to have both a flow meter and automatic sampler in place if need be with this water permit application.

40. Are any process changes or expansions planned in the immediate future that could alter wastewater volumes or characteristics? (Consider production processes as well as air or water pollution treatment processes that may affect the discharge).

- Yes No

41. Are any materials or water reclamation systems in use or planned?

- Yes² No

42. **If "Yes" for Item #41, describe the recovery process, substances recovered, percent recovered, and the concentrations in the spent solution. Submit a flow diagram for each process. (Attach additional sheets if needed):

Water is recycled back to stage #3, then stage #2. Max Concentration in rinse tanks 1/100 of solutions. As the system regenerates .03 to .05% of solution is added. When water is overflowing to the sewer, it will have 2 to 5% concentration of the chemicals added.

PART H: CHARACTERISTICS OF DISCHARGE

► BUILDING LAYOUT

Submit scale drawings (or blueprints) showing the location of each building on the premises. Show map orientation and location of all water meters, storm drains, numbered unit processes (from schematic flow diagram), and public sewers. Show existing and/or proposed sampling locations.

► SCHEMATIC FLOW DIAGRAM

For each major activity in which wastewater is or will be generated, on an attached sheet, draw a diagram of the flow of materials, products, water, and wastewater from start of the activity to its completion, showing all unit processes. Indicate which processes use water and which generate wastestreams. Include the average daily volume and maximum daily volume of each wastestream (new facilities or new dischargers may estimate). If estimates are used for flow data this must be indicated. Number each unit process having wastewater discharges to the community sewer.

(Continued on page 7)

¹ If the facility has, or will have, automatic sampling equipment or continuous wastewater flow metering equipment, please indicate the present or future location of this equipment on the sewer schematic (Part H: Schematic Flow Diagram).

² If Yes, attach a description of these changes and their effects on the wastewater volume and characteristics.

PART I: SEWER INFORMATION

▶ **Existing Facility**

43. If source is not connected to sanitary sewer, has the source applied for sanitary sewer hookup?

Yes No

▶ **NEW FACILITY OR NEW DISCHARGER**

44. Will the source be connected to the public sanitary sewer system?

Yes No

PART J: TREATMENT

45. Is any form of wastewater treatment practiced at this facility?

Yes No

46. Do you have a certified operator for your pretreatment facility?

Yes No

47. Is any form of wastewater treatment (or changes to an existing wastewater treatment) planned for this facility within the immediate future?

Yes* No

*If yes, please describe:

48. Description of Pretreatment:

Include step-by-step procedure, including any process equipment, design capacity, and operating conditions. Attach a process-flow diagram of the pretreatment.

N/A

▶ Attach a process-flow diagram of the pretreatment.

PART K: SAMPLING DATA

49. Attach any representative sampling data³ pertaining to the facility discharge to the sewer system. Explain below and/or in the attachment(s) where and when the sampling was accomplished, what type of sample was taken (i.e., grab, composite), and how many samples were analyzed. Be sure the sampling and analytical methods conform to 40 CFR Part 136. If they do not, indicate what method was used.

▶ Attach any sampling data³ pertaining to the facility discharge to the sewer system.

(Continued on page 8)

³If no sampling data is available, testing must be performed on the discharge for any pollutant believed to be present. The sample must be a 24-hour composite taken during normal production activity and/or representing typical wastewater flows. A representative list of pollutants is contained in Table I (on page 10 of this application). Please check the pollutants you know or suspect of being in your discharge. New facilities should use the table to indicate what pollutants will be present or suspected to be present in proposed wastestreams.

PART L: SPILL PREVENTION

50. Do you have chemical storage containers, bins, or ponds at your facility?

Yes No

51. Do you have floor drains in your manufacturing or chemical storage area(s)?

Yes** No

**If yes, identify where they discharge to:

▶ Attach a list of the types and quantity of chemicals used or planned for use. Copies of Manufacturer's Safety Data Sheets (MSDS) may be requested for additional information.

PART M: NON-DISCHARGED WASTES

52. Are any waste liquids or sludges generated and not disposed of in the sanitary sewer system?

Yes* No

*If YES, provide the following information (attach additional sheets if necessary):

	Waste(s) Generated	Quantity (per year; specify units)	Disposal Method
a.	Process water from Powder coat lines	22 Totes/Yr. (275 gal ea.)	3rd party (Superior Oil)
b.			
c.			
d.			
e.			
f.			
g.			
h.			
i.			
j.			

PART N: ADMINISTRATIVE OPERATIONS AND PROCEDURES ACT (AOPA)

▶ On copies of the form entitled, "Identification Of Potentially Affected Persons" (Form # 49456) (available from the IDEM Office of Water Quality or on the Internet at <http://www.IN.gov/icpr/webfile/formsdiv/49456.pdf>), list the names and addresses of all persons who, to your knowledge, may be potentially affected by the discharge from your facility. The AOPA (Administrative Operations And Procedures Act) requires such parties to be individually notified by IDEM when the proposed and final permit is public noticed. Persons not notified may have the final permit rendered null and void if they have been substantially prejudiced by the lack of notice.

(Continued on page 9)

PART O: AUTHORIZED REPRESENTATIVE STATEMENT

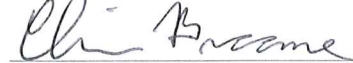
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Chris Broome, President

01/26/2024

Name/Title

Date (mm/dd/yyyy)



765-987-7999

Signature

Phone # ((xxx) xxx-xxxx)

TABLE 1: POLLUTANTS OF CONCERN

PRIORITY POLLUTANTS LIST
(40 CFR 403, APENDIX B)

HEAVY METALS AND INORGANICS

- Antimony (Sb)md
- Arsenic (As)
- Asbestos
- Beryllium (Be)
- Cadmium (Cd)
- Chromium (Cr)
- Copper (Cu)
- Cyanides (CN)
- Lead (Pb)
- Mercury (Hg)
- Nickel (Ni)
- Selenium (Se)
- Silver (Ag)
- Thallium (Tl)
- Zinc (Zn)

TOXIC ORGANICS: ETHERS

- Ether, bis(2-chloroethyl)
- Ether, bis(2-chloroisopropyl)
- Ether, 2-chloroethyl vinyl
- Ether, 4-chlorophenyl phenyl
- Ether, 4-bromophenyl phenyl
- Bis (2-chloroethoxy) methane

TOXIC ORGANICS: PHTHALATES

- Phthalate, dimethyl; DMP
- Phthalate, diethyl; DEP
- Phthalate, di-n-butyl; DBP
- Phthalate, di-n-octyl; DOP
- Phthalate, bis(2-ethylhexyl); DEHP
- Phthalate, butyl benzyl; BBP

TOXIC ORGANICS: NITROGEN COMPOUNDS

- Nitrosamine, dimethyl-
- Nitrosamine, diphenyl-
- Nitrosamine, di-n-propyl-
- Benzidine
- Benzidine, 3,3'-dichloro-
- Hydrazine, 1,2-diphenyl-
- Acrylonitrile

TOXIC ORGANICS: PHENOLS

- Phenol
- Phenol, 2-chloro
- Phenol, 2,4-dichloro-; 2,4-DCP
- Phenol, 2,4,6-trichloro-
- Phenol, pentachloro-; PCP
- Phenol, 2-nitro-
- Phenol, 4-nitro-
- Phenol, 2,4-dinitro-; 2,4-DNP
- Phenol, 2,4-dimethyl-
- m-Cresol, p-chloro-
- o-Cresol, 4,6-dinitro-; DNOC

TOXIC ORGANICS: AROMATICS

- Benzene
- Benzene, chloro-
- Benzene, 1,2-dichloro-
- Benzene, 1,3-dichloro-
- Benzene, 1,4-dichloro-
- Benzene, hexachloro-; HCB
- Benzene, ethyl-
- Benzene, nitro-
- Toluene
- Toluene, 2,4-dinitro-; DNT
- Toluene, 2,6-dinitro-
- Benzene, 1,2,4-trichloro-

TOXIC ORGANICS: POLYNUCLEAR AROMATIC HYDROCARBONS (PAHs)

- 2-Chloronaphthalene
- Benzo (a) anthracene
- Benzo (b) fluoranthene; B(b)F
- Benzo (k) fluoranthene; B(k)F
- Benzo (a) pyrene; B(a)P
- Ideno (1,2,3-cd) pyrene; IP
- Dibenzo (a,h) anthracene; DBA
- Benzo (ghi) perylene
- Acenaphthene
- Acenaphthylene
- Anthracene
- Chrysene
- Fluoranthene
- Fluorene
- Naphthalene
- Phenanthrene
- Pyrene

TOXIC ORGANICS: PCB's

- PCB-1016; Aroclor 1016
- PCB-1221; Aroclor 1221
- PCB-1232; Aroclor 1232
- PCB-1242; Aroclor 1242
- PCB-1248; Aroclor 1248
- PCB-1254; Aroclor 1254
- PCB-1260; Aroclor 1260

TOXIC ORGANICS: HALOGENATED ALIPHATIC HYDROCARBONS

- Methane, chloro-; methyl chloride
- Methane, dichloro-; Methylene chloride
- Methane, trichloro-; chloroform
- Methane, tetrachloro-; Carbon tetrachloride
- Methane, bromo-; methyl bromide
- Methane, dichlorobromo-
- Methane, chlorodibromom-
- Methane, tribromo-; bromoform
- Ethane, chloro-

TABLE 1: POLLUTANTS OF CONCERN (CONTINUED)

TOXIC ORGANICS: HALOGENATED ALIPHATIC HYDROCARBONS	CONVENTIONAL POLLUTANTS: (LISTED IN 40 CFR 401.16)
<input type="checkbox"/> Ethane, 1,1-dichloro-	<input type="checkbox"/> Biochemical Oxygen Demand (BOD)
<input type="checkbox"/> Ethane, 1,2-dichloro-	<input checked="" type="checkbox"/> pH (Acid or Base)
<input type="checkbox"/> Ethane, 1,1,1-trichloro-	<input type="checkbox"/> Total Suspended Solids (TSS)
<input type="checkbox"/> Ethane, 1,1,2-trichloro-	<input checked="" type="checkbox"/> Oil and Grease (O&G)
<input type="checkbox"/> Ethane, 1,1,2,2-tetrachloro-	
<input type="checkbox"/> Ethane, hexachloro-	NONCONVENTIONAL POLLUTANTS OF CONCERN:
<input type="checkbox"/> Ethylene, chloro-; Vinyl Chloride	(NOT LISTED AS TOXIC OR CONVENTIONAL)
<input type="checkbox"/> Ethylene, 1,1-dichloro-; 1,1-DCE	<input type="checkbox"/> Ammonia (NH3)
<input type="checkbox"/> Ethylene, 1,2-trans-dichloro-	<input type="checkbox"/> Chlorides (Cl-1)
<input type="checkbox"/> Ethylene, trichloro-; TCE	<input type="checkbox"/> Sulfides (S-2)
<input type="checkbox"/> Ethylene, tetrachloro-; Perchloroethylene	<input type="checkbox"/> Total Dissolved Solids (TDS)
<input type="checkbox"/> Propane, 1,2-dichloro-	<input type="checkbox"/> Phosphate (PO4)
<input type="checkbox"/> Propylene, 1,3-dichloro-	<input type="checkbox"/> Chemical Oxygen Demand (COD)
<input type="checkbox"/> Butadiene, hexachloro-; HCBD	
<input type="checkbox"/> Cyclopentadiene, hexachloro-; HCCPD	
TOXIC ORGANICS: PESTICIDES	
<input type="checkbox"/> alpha-Endosulfan	
<input type="checkbox"/> Endosulfan sulfate	
<input type="checkbox"/> beta-Endosulfan	
<input type="checkbox"/> Hexachlorocyclohexanes:	
<input type="checkbox"/>	
<input type="checkbox"/>	
<input type="checkbox"/>	
<input type="checkbox"/>	
<input type="checkbox"/>	
<input type="checkbox"/> alpha-BHC	
<input type="checkbox"/> beta-BHC	
<input type="checkbox"/> gamma-BHC	
<input type="checkbox"/> delta-BHC; Lindane	
<input type="checkbox"/> Aldrin; HHDN	
<input type="checkbox"/> Dieldrin; HEOD	
<input type="checkbox"/> 4,4'-DDE	
<input type="checkbox"/> 4,4'-DDT; p,p'-DDT	
<input type="checkbox"/> 4,4'-DDD; p,p'-DDD; p,p'-TDE	
<input type="checkbox"/> Endrin	
<input type="checkbox"/> Endrin aldehyde	
<input type="checkbox"/> Heptachlor	
<input type="checkbox"/> Heptachlor epoxide	
<input type="checkbox"/> Chlordane	
<input type="checkbox"/> Toxaphene	
TOXIC ORGANICS: OXYGENATED COMPOUNDS	
<input type="checkbox"/> Acrolein	
TOXIC ORGANICS: MISCELLANEOUS	
<input type="checkbox"/> Isophorone	
<input type="checkbox"/> 2,3,7,8-tetrachlorodibenzo-p-dioxin; TCDD; dioxin	

APPENDIX: CONTACT PEOPLE AND MAILING ADDRESSES

The Office of Water Quality has a contact person for each of the areas that apply to pretreatment. The name and telephone number is listed below for each contact person. Correspondences should be sent to the address below to the attention of the appropriate contact.

General Address:

- ☐ Indiana Department of Environmental Management
- ☐ Office of Water Quality
- ☐ 100 North Senate Avenue
- ☐ Indianapolis, Indiana 46204

Contacts :

(Direct correspondence to the individuals below by adding "Attention: {Insert Contact Name Listed Below}" to the address)

For IWP Permits:

Contact: Industrial NPDES Permits Section
Telephone: 317/232-8760

For Construction Permits:

Contact: Facility Construction Section
Telephone: 317/232-8645



IDENTIFICATION OF POTENTIALLY AFFECTED PARTIES

State Form 49456 (R3 / 9-22)

IDEM

Office of Water Quality, Permits Branch
100 North Senate Ave.
MC 65-42PS
Indianapolis, IN 46204-2251

The Administrative Orders and Procedures Act (AOPA) IC 4-21.5-3-5(b), requires that the Indiana Department of Environmental Management (IDEM) give notice of its decision on your application to the following persons:

- a) Each person to whom the decision is specifically directed;
- b) Each person to whom a law requires notice to be given;
- c) Each competitor who has applied to the IDEM for a mutually exclusive license, if issuance is the subject of the decision and the competitor's application has not been denied in an order for which all rights to judicial review have been waived or exhausted;
- d) Each person who has provided the IDEM with a written request for notification of the decision;
- e) Each person who has a substantial and direct proprietary interest in the issuance of the (permit/variance);
- f) Each person whose absence as a party in the proceeding concerning the (permit/variance) decision would deny another party complete relief in the proceeding or who claims an interest related to the issuance of the (permit/variance) and is so situated that the disposition of the matter, in the person's absence may:
 - 1) As a practical matter impair or impede the person's ability to protect that interest, or
 - 2) Leave any other person who is a party to a proceeding concerning the permit subject to a substantial risk of incurring multiple or otherwise an inconsistent obligation by reason of the person's claimed interest.

IC 4-21.5-3-5(f) provides that we may request your assistance in identifying these people.


Additionally, IC 13-15-3-1 requires IDEM to send notice that the permit application has been received by the department to the following:

- a) The board of county commissioners of a county affected by the permit application and
- b) The mayor of a city that is affected by the permit application, or
- c) The president of a town council of a town affected by the permit application.

Please provide on the following form the names of those persons affected by these statutes, and include mailing labels with your application. These mailing labels should have the names and addresses of the affected parties along with our mailing code (65-42PS) listed above each affected party listing.

Example: 65-42PS
John Doe
111 Circle Drive
City, State, Zip Code

II. Please complete this form by signing the following statement.

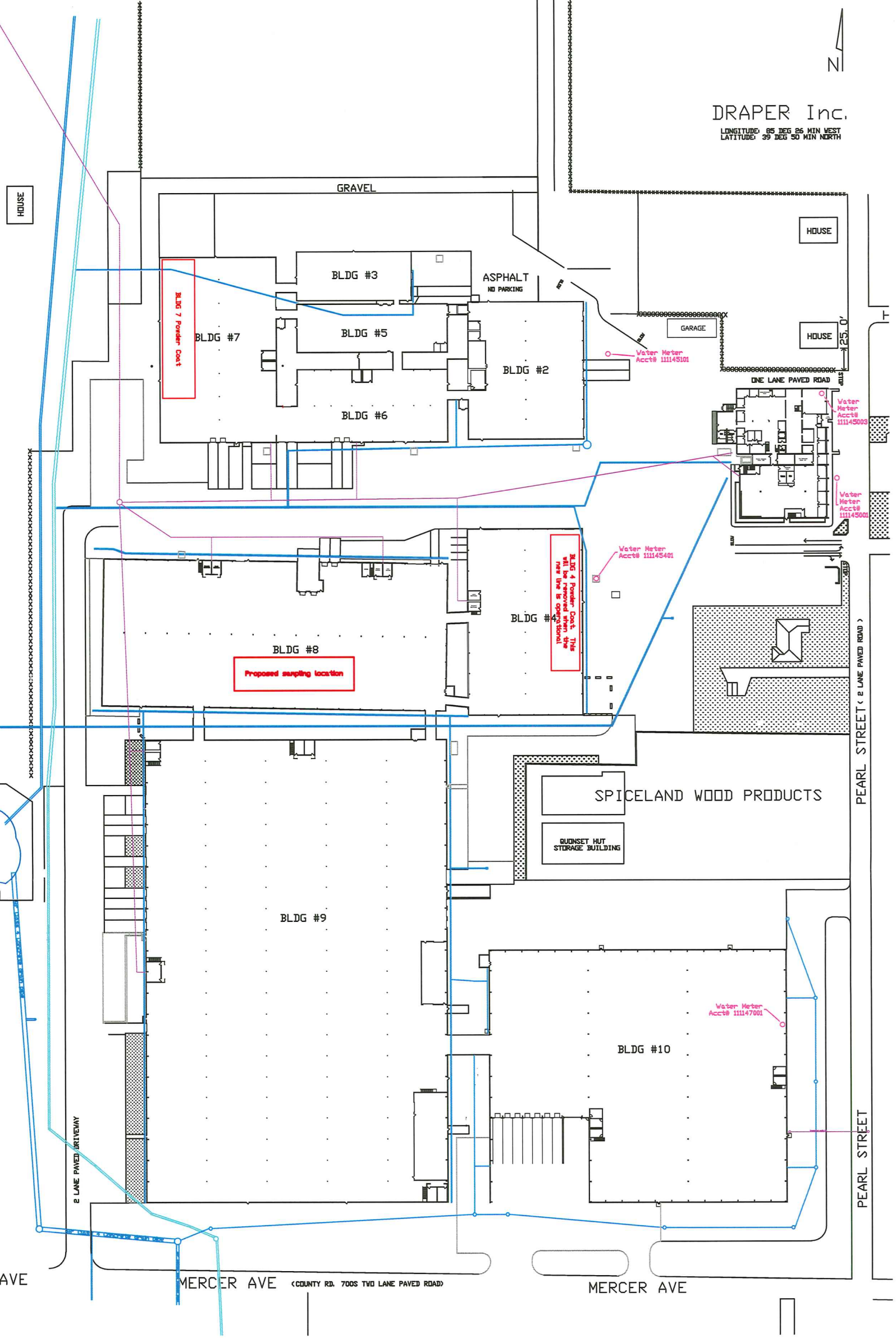
I certify to the best of my knowledge I have listed all potentially affected parties, as defined by IC 4-21.5.		
Signature: 		
Printed name: Chris Broome	Date (month, day, year): 3-5-24	
Name of facility: Draper, Inc		
Address of facility (number and street): 411 S. Pearl St		
City of facility: Spiceland	State of facility: IN	ZIP code: 47385

III. Type of Action (check one)

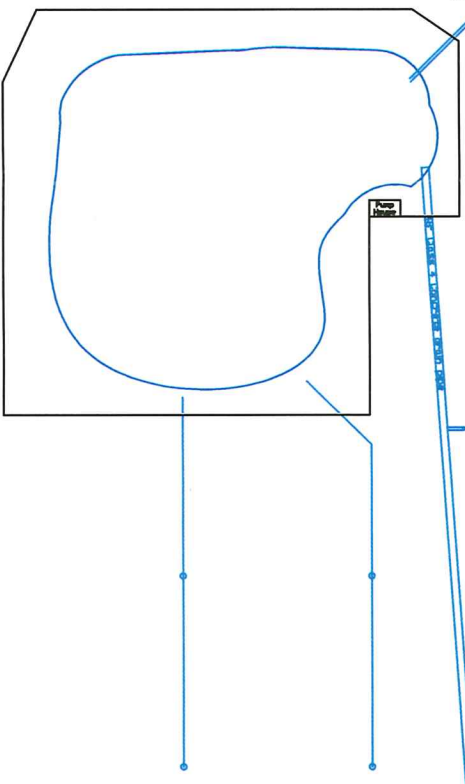
- NPDES Permit-327 IAC 5
- Pretreatment Permit -327 IAC 5
- Construction Permit-327 IAC 3



DRAPER Inc.
 LONGITUDE: 85 DEG 25 MIN WEST
 LATITUDE: 39 DEG 50 MIN NORTH



Notes for water permit
 1.) Purple is sanitary sewer
 2.) Dark blue is storm water/drainage
 3.) Light blue is county legal drain





SHRWD

SOUTH HENRY REGIONAL WASTE DISTRICT

301 South Williams Street | P.O. Box 147 | Lewisville, Indiana 47352
Office (765) 987-8432 | Fax (765) 987-8352
www.shrwd.org

March 6, 2024

Brad Craft
Draper, Inc.
411 S Pearl St
PO Box 425
Spiceland, IN 47385

Dear Brad,

The District Board of Directors met in December. It was decided that South Henry Regional Waste District will accept the Process Wastewater from Draper Inc. It was also decided that the capacity fee for treating Draper's process water will remain at the \$8,500 rate. This must be paid prior to discharging any process water into the sanitary sewer system.

The process water discharge flow will be monitored for one year and could be adjusted depending on the amount.

Also, any expenses incurred by the District, in relationship to the process water, will be passed on to Draper, Inc. Our attorney will draw up an agreement once IDEM tells us what extra testing that we will need to do.

If you have any questions, please feel free to contact me at the above telephone number or address.

Sincerely,

Brian Mayne
District Superintendent

SAFETY DATA SHEET

1. Identification

Product identifier Americo AMB-5147

Other means of identification

Product code 50260

Recommended use Metal and Aluminum Treatment

Recommended restrictions None known.

Manufacturer/Importer/Supplier/Distributor information

Manufacturer

Company name Americo Chemical Products, Inc.
Address 1765 Holmes Road
Elgin, IL 60123
United States

Telephone Office 630-588-0830

Website <http://americochemical.com/>

E-mail Not available.

Emergency phone number CHEMTREC Emergency #: 800-424-9300

2. Hazard(s) identification

Physical hazards Not classified.

Health hazards Skin corrosion/irritation Category 1
Serious eye damage/eye irritation Category 1
Reproductive toxicity Category 2

Environmental hazards Not classified.

OSHA defined hazards Not classified.

Label elements



Signal word Danger

Hazard statement Causes severe skin burns and eye damage. Causes serious eye damage. Suspected of damaging fertility or the unborn child.

Precautionary statement

Prevention Obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Do not breathe mist/vapors. Wash thoroughly after handling. Wear protective gloves/protective clothing/eye protection/face protection.

Response If swallowed: Rinse mouth. Do NOT induce vomiting. If on skin (or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower. If inhaled: Remove person to fresh air and keep comfortable for breathing. If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a poison center/doctor. Wash contaminated clothing before reuse.

Storage Store locked up.

Disposal Dispose of contents/container in accordance with local/regional/national/international regulations.

Hazard(s) not otherwise classified (HNOC) None known.

Supplemental information 1.76% of the mixture consists of component(s) of unknown acute oral toxicity. 1.76% of the mixture consists of component(s) of unknown acute dermal toxicity. 1.76% of the mixture consists of component(s) of unknown acute inhalation toxicity. 1.5% of the mixture consists of component(s) of unknown acute hazards to the aquatic environment. 1.5% of the mixture consists of component(s) of unknown long-term hazards to the aquatic environment.

3. Composition/information on ingredients

Mixtures

Chemical name	Common name and synonyms	CAS number	%
FLUOROTITANIC ACID		17439-11-1	1 - < 3
Fluorozirconic Acid		12021-95-3	1 - < 3
Boric Acid		10043-35-3	< 1
Other components below reportable levels			90 - 100

4. First-aid measures

Inhalation	Move to fresh air. Call a physician if symptoms develop or persist.
Skin contact	Take off immediately all contaminated clothing. Rinse skin with water/shower. Call a physician or poison control center immediately. Chemical burns must be treated by a physician. Wash contaminated clothing before reuse.
Eye contact	Immediately flush eyes with plenty of water for at least 15 minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Call a physician or poison control center immediately.
Ingestion	Call a physician or poison control center immediately. Rinse mouth. Do not induce vomiting. If vomiting occurs, keep head low so that stomach content doesn't get into the lungs.
Most important symptoms/effects, acute and delayed	Burning pain and severe corrosive skin damage. Causes serious eye damage. Symptoms may include stinging, tearing, redness, swelling, and blurred vision. Permanent eye damage including blindness could result.
Indication of immediate medical attention and special treatment needed	Provide general supportive measures and treat symptomatically. Chemical burns: Flush with water immediately. While flushing, remove clothes which do not adhere to affected area. Call an ambulance. Continue flushing during transport to hospital. Keep victim under observation. Symptoms may be delayed.
General information	IF exposed or concerned: Get medical advice/attention. If you feel unwell, seek medical advice (show the label where possible). Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. Show this safety data sheet to the doctor in attendance.

5. Fire-fighting measures

Suitable extinguishing media	Water fog. Foam. Dry chemical powder. Carbon dioxide (CO2).
Unsuitable extinguishing media	Do not use water jet as an extinguisher, as this will spread the fire.
Specific hazards arising from the chemical	During fire, gases hazardous to health may be formed.
Special protective equipment and precautions for firefighters	Self-contained breathing apparatus and full protective clothing must be worn in case of fire.
Fire fighting equipment/instructions	Move containers from fire area if you can do so without risk.
Specific methods	Use standard firefighting procedures and consider the hazards of other involved materials.
General fire hazards	No unusual fire or explosion hazards noted.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures	Keep unnecessary personnel away. Keep people away from and upwind of spill/leak. Wear appropriate protective equipment and clothing during clean-up. Do not breathe mist/vapors. Do not touch damaged containers or spilled material unless wearing appropriate protective clothing. Ensure adequate ventilation. Local authorities should be advised if significant spillages cannot be contained. For personal protection, see section 8 of the SDS.
Methods and materials for containment and cleaning up	This product is miscible in water. Should not be released into the environment. Large Spills: Stop the flow of material, if this is without risk. Dike the spilled material, where this is possible. Absorb in vermiculite, dry sand or earth and place into containers. Following product recovery, flush area with water. Small Spills: Wipe up with absorbent material (e.g. cloth, fleece). Clean surface thoroughly to remove residual contamination.
Environmental precautions	Never return spills to original containers for re-use. For waste disposal, see section 13 of the SDS. Prevent further leakage or spillage if safe to do so. Do not contaminate water. Avoid discharge into drains, water courses or onto the ground.

7. Handling and storage

Precautions for safe handling Obtain special instructions before use. Do not handle until all safety precautions have been read and understood. Do not breathe mist/vapors. Do not get in eyes, on skin, or on clothing. Avoid prolonged exposure. Pregnant or breastfeeding women must not handle this product. Should be handled in closed systems, if possible. Provide adequate ventilation. Wear appropriate personal protective equipment. Observe good industrial hygiene practices.

Conditions for safe storage, including any incompatibilities Store locked up. Store in tightly closed container. Store away from incompatible materials (see Section 10 of the SDS).

8. Exposure controls/personal protection

Occupational exposure limits

The following constituents are the only constituents of the product which have a PEL, TLV or other recommended exposure limit. At this time, the other constituents have no known exposure limits.

US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

Components	Type	Value
Fluorozirconic Acid (CAS 12021-95-3)	PEL	5 mg/m3

US. ACGIH Threshold Limit Values

Components	Type	Value	Form
Boric Acid (CAS 10043-35-3)	STEL	6 mg/m3	Inhalable fraction.
	TWA	2 mg/m3	Inhalable fraction.
Fluorozirconic Acid (CAS 12021-95-3)	STEL	10 mg/m3	
	TWA	5 mg/m3	

US. NIOSH: Pocket Guide to Chemical Hazards

Components	Type	Value
FLUOROTITANIC ACID (CAS 17439-11-1)	TWA	2.5 mg/m3
Fluorozirconic Acid (CAS 12021-95-3)	STEL	10 mg/m3

Biological limit values No biological exposure limits noted for the ingredient(s).

Appropriate engineering controls Good general ventilation should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level. Eye wash facilities and emergency shower must be available when handling this product.

Individual protection measures, such as personal protective equipment

Eye/face protection	Chemical respirator with organic vapor cartridge and full facepiece.
Skin protection	
Hand protection	Wear appropriate chemical resistant gloves.
Other	Wear appropriate chemical resistant clothing. Use of an impervious apron is recommended.
Respiratory protection	Chemical respirator with organic vapor cartridge and full facepiece.
Thermal hazards	Wear appropriate thermal protective clothing, when necessary.

General hygiene considerations Observe any medical surveillance requirements. Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

9. Physical and chemical properties

Appearance	Clear.
Physical state	Liquid.
Color	Colorless
Odor	Mild. Pungent.
Odor threshold	Not available.
pH	1.1 (As Is) estimated

Melting point/freezing point	Not available.
Initial boiling point and boiling range	Not available.
Flash point	Not available.
Evaporation rate	Not available.
Flammability (solid, gas)	Not applicable.
Upper/lower flammability or explosive limits	
Flammability limit - lower (%)	Not available.
Flammability limit - upper (%)	Not available.
Explosive limit - lower (%)	Not available.
Explosive limit - upper (%)	Not available.
Vapor pressure	Not available.
Vapor density	Not available.
Relative density	Not available.
Solubility(ies)	
Solubility (water)	100 Complete
Partition coefficient (n-octanol/water)	Not available.
Auto-ignition temperature	Not available.
Decomposition temperature	Not available.
Viscosity	Not available.
Other information	
Explosive properties	Not explosive.
Oxidizing properties	Not oxidizing.
Specific gravity	1.03 (As Is) estimated

10. Stability and reactivity

Reactivity	Reacts violently with strong alkaline substances. This product may react with reducing agents.
Chemical stability	Material is stable under normal conditions.
Possibility of hazardous reactions	Hazardous polymerization does not occur.
Conditions to avoid	Contact with incompatible materials. Do not mix with other chemicals.
Incompatible materials	Bases. Reducing agents.
Hazardous decomposition products	No hazardous decomposition products are known.

11. Toxicological information

Information on likely routes of exposure

Inhalation	May cause irritation to the respiratory system. Prolonged inhalation may be harmful.
Skin contact	Causes severe skin burns.
Eye contact	Causes serious eye damage.
Ingestion	Causes digestive tract burns.
Symptoms related to the physical, chemical and toxicological characteristics	Burning pain and severe corrosive skin damage. Causes serious eye damage. Symptoms may include stinging, tearing, redness, swelling, and blurred vision. Permanent eye damage including blindness could result.

Information on toxicological effects

Acute toxicity	Not known.
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Components	Species	Test Results
Boric Acid (CAS 10043-35-3)		
Acute		
Dermal		
LD50	Rabbit	> 2000 mg/kg
Inhalation		
LC50	Rat	> 0.002 mg/l, 4 Hours
Oral		
LD50	Rat	2660 mg/kg
Skin corrosion/irritation	Causes severe skin burns and eye damage.	
Serious eye damage/eye irritation	Causes serious eye damage.	
Respiratory or skin sensitization		
Respiratory sensitization	Not a respiratory sensitizer.	
Skin sensitization	This product is not expected to cause skin sensitization.	
Germ cell mutagenicity	No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic.	
Carcinogenicity	Not classifiable as to carcinogenicity to humans.	
IARC Monographs. Overall Evaluation of Carcinogenicity		
Not listed.		
OSHA Specifically Regulated Substances (29 CFR 1910.1001-1053)		
Not listed.		
US. National Toxicology Program (NTP) Report on Carcinogens		
Not listed.		
Reproductive toxicity	Suspected of damaging fertility or the unborn child.	
Specific target organ toxicity - single exposure	Not classified.	
Specific target organ toxicity - repeated exposure	Not classified.	
Aspiration hazard	Not an aspiration hazard.	
Chronic effects	Prolonged inhalation may be harmful.	

12. Ecological information

Ecotoxicity Because of the low pH of this product, it would be expected to produce significant ecotoxicity upon exposure to aquatic organisms and aquatic systems.

Components	Species	Test Results
Boric Acid (CAS 10043-35-3)		
Aquatic		
Fish	LC50	Razorback sucker (Xyrauchen texanus) > 100 mg/l, 96 hours

Persistence and degradability No data is available on the degradability of any ingredients in the mixture.

Bioaccumulative potential No data available.

Mobility in soil No data available.

Other adverse effects No other adverse environmental effects (e.g. ozone depletion, photochemical ozone creation potential, endocrine disruption, global warming potential) are expected from this component.

13. Disposal considerations

Disposal instructions Collect and reclaim or dispose in sealed containers at licensed waste disposal site. Incinerate the material under controlled conditions in an approved incinerator. Do not allow this material to drain into sewers/water supplies. Dispose of contents/container in accordance with local/regional/national/international regulations.

Local disposal regulations Dispose in accordance with all applicable regulations.

Hazardous waste code D002: Waste Corrosive material [pH <=2 or >=12.5, or corrosive to steel]
The waste code should be assigned in discussion between the user, the producer and the waste disposal company.

Waste from residues / unused products Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions).

Contaminated packaging Since emptied containers may retain product residue, follow label warnings even after container is emptied. Empty containers should be taken to an approved waste handling site for recycling or disposal.

14. Transport information

DOT

UN number UN3264
UN proper shipping name Corrosive liquid, acidic, inorganic, n.o.s. (FLUOROTITANIC ACID, Fluorozirconic Acid)
Transport hazard class(es)
Class 8
Subsidiary risk -
Label(s) 8
Packing group II
Special precautions for user Read safety instructions, SDS and emergency procedures before handling.
Special provisions B2, IB2, T11, TP2, TP27
Packaging exceptions 154
Packaging non bulk 202
Packaging bulk 242

Reportable Quantity (RQ) 100# (Hydrogen Fluoride)

DOT



15. Regulatory information

US federal regulations This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

Toxic Substances Control Act (TSCA)

TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

CERCLA Hazardous Substance List (40 CFR 302.4)

Not listed.

SARA 304 Emergency release notification

Not regulated.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1053)

Not listed.

Superfund Amendments and Reauthorization Act of 1986 (SARA)

SARA 302 Extremely hazardous substance

Not listed.

SARA 311/312 Hazardous chemical

Yes

Classified hazard categories Skin corrosion or irritation
Serious eye damage or eye irritation
Reproductive toxicity

SARA 313 (TRI reporting)

Not regulated.

Other federal regulations

Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List

Not regulated.

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act (SDWA) Not regulated.

US state regulations

California Proposition 65

California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): This material is not known to contain any chemicals currently listed as carcinogens or reproductive toxins. For more information go to www.P65Warnings.ca.gov.

US. California. Candidate Chemicals List. Safer Consumer Products Regulations (Cal. Code Regs, tit. 22, 69502.3, subd. (a))

Boric Acid (CAS 10043-35-3)

International Inventories

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	Yes
Canada	Domestic Substances List (DSL)	Yes
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	Yes
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	Yes
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	Yes
Korea	Existing Chemicals List (ECL)	Yes
New Zealand	New Zealand Inventory	Yes
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	No
Taiwan	Taiwan Chemical Substance Inventory (TCSI)	Yes
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	Yes

*A "Yes" indicates that all components of this product comply with the inventory requirements administered by the governing country(s)

A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

16. Other information, including date of preparation or last revision

Issue date	01-18-2019
Revision date	7-31-2020
Version #	03

Disclaimer

Americo Chemical Products, Inc. cannot anticipate all conditions under which this information and its product, or the products of other manufacturers in combination with its product, may be used. It is the user's responsibility to ensure safe conditions for handling, storage and disposal of the product, and to assume liability for loss, injury, damage or expense due to improper use. The information in the sheet was written based on the best knowledge and experience currently available.

This document has undergone significant changes and should be reviewed in its entirety.

Revision information

SAFETY DATA SHEET

1. Identification

Product identifier Americo Spray Clean 2500

Other means of identification

Product code 50671

Recommended use Cleaner for Metal

Recommended restrictions None known.

Manufacturer/Importer/Supplier/Distributor information

Manufacturer

Company name Americo Chemical Products, Inc.

Address 1765 Holmes Road
Elgin, IL 60123
United States

Telephone Office 630-588-0830

Website <http://americochemical.com/>

E-mail Not available.

Emergency phone number CHEMTREC Emergency #: 800-424-9300

2. Hazard(s) identification

Physical hazards Corrosive to metals Category 1

Health hazards Acute toxicity, oral Category 4

Skin corrosion/irritation Category 1

Serious eye damage/eye irritation Category 1

Specific target organ toxicity, single exposure Category 1

Environmental hazards Not classified.

OSHA defined hazards Not classified.

Label elements



Signal word Danger

Hazard statement May be corrosive to metals. Harmful if swallowed. Causes severe skin burns and eye damage. Causes serious eye damage. Causes damage to organs.

Precautionary statement

Prevention Keep only in original container. Do not breathe mist/vapors. Wash thoroughly after handling. Do not eat, drink or smoke when using this product. Wear protective gloves/protective clothing/eye protection/face protection.

Response If swallowed: Rinse mouth. Do NOT induce vomiting. If on skin (or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower. If inhaled: Remove person to fresh air and keep comfortable for breathing. If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a poison center/doctor. Wash contaminated clothing before reuse. Absorb spillage to prevent material damage.

Storage Store locked up. Store in corrosive resistant container with a resistant inner liner.

Disposal Dispose of contents/container in accordance with local/regional/national/international regulations.

Hazard(s) not otherwise classified (HNOC) None known.

Supplemental information None.

3. Composition/information on ingredients

Mixtures

Chemical name	Common name and synonyms	CAS number	%
Potassium Hydroxide		1310-58-3	20 - < 30
Aminotri(methylenephosphonic Acid)		6419-19-8	1 - < 3
Sodium hydroxide		1310-73-2	1 - < 3
Other components below reportable levels			60 - < 70

4. First-aid measures

Inhalation	Move to fresh air. Call a physician if symptoms develop or persist.
Skin contact	Take off immediately all contaminated clothing. Rinse skin with water/shower. Call a physician or poison control center immediately. Chemical burns must be treated by a physician. Wash contaminated clothing before reuse.
Eye contact	Immediately flush eyes with plenty of water for at least 15 minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Call a physician or poison control center immediately.
Ingestion	Call a physician or poison control center immediately. Rinse mouth. Do not induce vomiting. If vomiting occurs, keep head low so that stomach content doesn't get into the lungs.
Most important symptoms/effects, acute and delayed	Nausea, vomiting. Diarrhea. Burning pain and severe corrosive skin damage. Causes serious eye damage. Symptoms may include stinging, tearing, redness, swelling, and blurred vision. Permanent eye damage including blindness could result. Coughing.
Indication of immediate medical attention and special treatment needed	Provide general supportive measures and treat symptomatically. Chemical burns: Flush with water immediately. While flushing, remove clothes which do not adhere to affected area. Call an ambulance. Continue flushing during transport to hospital. Keep victim warm. Keep victim under observation. Symptoms may be delayed.
General information	If you feel unwell, seek medical advice (show the label where possible). Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. Show this safety data sheet to the doctor in attendance.

5. Fire-fighting measures

Suitable extinguishing media	Water fog. Foam. Dry chemical powder. Carbon dioxide (CO2).
Unsuitable extinguishing media	Do not use water jet as an extinguisher, as this will spread the fire.
Specific hazards arising from the chemical	During fire, gases hazardous to health may be formed.
Special protective equipment and precautions for firefighters	Self-contained breathing apparatus and full protective clothing must be worn in case of fire.
Fire fighting equipment/instructions	Move containers from fire area if you can do so without risk.
Specific methods	Use standard firefighting procedures and consider the hazards of other involved materials.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures	Keep unnecessary personnel away. Keep people away from and upwind of spill/leak. Wear appropriate protective equipment and clothing during clean-up. Do not breathe mist/vapors. Do not touch damaged containers or spilled material unless wearing appropriate protective clothing. Ensure adequate ventilation. Local authorities should be advised if significant spillages cannot be contained. For personal protection, see section 8 of the SDS.
Methods and materials for containment and cleaning up	This product is miscible in water. Prevent entry into waterways, sewer, basements or confined areas. Large Spills: Stop the flow of material, if this is without risk. Dike the spilled material, where this is possible. Absorb spillage to prevent material damage. Use a non-combustible material like vermiculite, sand or earth to soak up the product and place into a container for later disposal. Following product recovery, flush area with water. Small Spills: Wipe up with absorbent material (e.g. cloth, fleece). Clean surface thoroughly to remove residual contamination.
Environmental precautions	Never return spills to original containers for re-use. For waste disposal, see section 13 of the SDS. Avoid discharge into drains, water courses or onto the ground.

7. Handling and storage

Precautions for safe handling Do not breathe mist/vapors. Do not get in eyes, on skin, or on clothing. Do not taste or swallow. Avoid prolonged exposure. When using, do not eat, drink or smoke. Provide adequate ventilation. Wear appropriate personal protective equipment. Wash hands thoroughly after handling. Observe good industrial hygiene practices.

Conditions for safe storage, including any incompatibilities Store locked up. Store in a cool, dry place out of direct sunlight. Store in corrosive resistant container with a resistant inner liner. Store in tightly closed container. Keep only in the original container. Store away from incompatible materials (see Section 10 of the SDS).

8. Exposure controls/personal protection

Occupational exposure limits

The following constituents are the only constituents of the product which have a PEL, TLV or other recommended exposure limit. At this time, the other constituents have no known exposure limits.

US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000)

Components	Type	Value
Sodium hydroxide (CAS 1310-73-2)	PEL	2 mg/m ³

US. ACGIH Threshold Limit Values

Components	Type	Value
Potassium Hydroxide (CAS 1310-58-3)	Ceiling	2 mg/m ³
Sodium hydroxide (CAS 1310-73-2)	Ceiling	2 mg/m ³

US. NIOSH: Pocket Guide to Chemical Hazards

Components	Type	Value
Potassium Hydroxide (CAS 1310-58-3)	Ceiling	2 mg/m ³
Sodium hydroxide (CAS 1310-73-2)	Ceiling	2 mg/m ³

US. Workplace Environmental Exposure Level (WEEL) Guides

Components	Type	Value	Form
Aminotri(methylenephosphoric Acid) (CAS 6419-19-8)	TWA	10 mg/m ³	Aerosol.

Biological limit values No biological exposure limits noted for the ingredient(s).

Appropriate engineering controls Good general ventilation should be used. Ventilation rates should be matched to conditions. If applicable, use process enclosures, local exhaust ventilation, or other engineering controls to maintain airborne levels below recommended exposure limits. If exposure limits have not been established, maintain airborne levels to an acceptable level. Eye wash facilities and emergency shower must be available when handling this product.

Individual protection measures, such as personal protective equipment

Eye/face protection Chemical respirator with organic vapor cartridge and full facepiece.

Skin protection

Hand protection Wear appropriate chemical resistant gloves.

Other Wear appropriate chemical resistant clothing. Use of an impervious apron is recommended.

Respiratory protection Chemical respirator with organic vapor cartridge and full facepiece.

Thermal hazards Wear appropriate thermal protective clothing, when necessary.

General hygiene considerations Keep away from food and drink. Always observe good personal hygiene measures, such as washing after handling the material and before eating, drinking, and/or smoking. Routinely wash work clothing and protective equipment to remove contaminants.

9. Physical and chemical properties

Appearance	Clear.
Physical state	Liquid.
Color	Dark brown
Odor	Mild. Faint.

Odor threshold	Not available.
pH	> 12 (As Is) estimated
Melting point/freezing point	Not available.
Initial boiling point and boiling range	Not available.
Flash point	Not available.
Evaporation rate	Not available.
Flammability (solid, gas)	Not applicable.
Upper/lower flammability or explosive limits	
Flammability limit - lower (%)	Not available.
Flammability limit - upper (%)	Not available.
Explosive limit - lower (%)	Not available.
Explosive limit - upper (%)	Not available.
Vapor pressure	Not available.
Vapor density	Not available.
Relative density	Not available.
Solubility(ies)	
Solubility (water)	100 % Complete
Partition coefficient (n-octanol/water)	Not available.
Auto-ignition temperature	Not available.
Decomposition temperature	Not available.
Viscosity	Not available.
Other information	
Explosive properties	Not explosive.
Oxidizing properties	Not oxidizing.
Specific gravity	1.345 (As Is) estimated

10. Stability and reactivity

Reactivity	Reacts violently with strong acids. This product may react with oxidizing agents. May be corrosive to metals.
Chemical stability	Material is stable under normal conditions.
Possibility of hazardous reactions	Hazardous polymerization does not occur.
Conditions to avoid	Contact with incompatible materials. Do not mix with other chemicals.
Incompatible materials	Strong acids. Strong oxidizing agents. Oxidizing agents. Metals. Maleic anhydride.
Hazardous decomposition products	No hazardous decomposition products are known.

11. Toxicological information

Information on likely routes of exposure

Inhalation	May cause damage to organs by inhalation. May cause irritation to the respiratory system. Prolonged inhalation may be harmful.
Skin contact	Causes severe skin burns.
Eye contact	Causes serious eye damage.
Ingestion	Causes digestive tract burns. Harmful if swallowed.
Symptoms related to the physical, chemical and toxicological characteristics	Nausea, vomiting. Diarrhea. Burning pain and severe corrosive skin damage. Causes serious eye damage. Symptoms may include stinging, tearing, redness, swelling, and blurred vision. Permanent eye damage including blindness could result. Coughing.

Information on toxicological effects

Acute toxicity	Harmful if swallowed.
-----------------------	-----------------------

Components	Species	Test Results
Potassium Hydroxide (CAS 1310-58-3)		
Acute		
Oral		
LD50	Rat	1.23 g/kg
Skin corrosion/irritation	Causes severe skin burns and eye damage.	
Serious eye damage/eye irritation	Causes serious eye damage.	
Respiratory or skin sensitization		
Respiratory sensitization	Not a respiratory sensitizer.	
Skin sensitization	This product is not expected to cause skin sensitization.	
Germ cell mutagenicity	No data available to indicate product or any components present at greater than 0.1% are mutagenic or genotoxic.	
Carcinogenicity	Not classifiable as to carcinogenicity to humans.	
IARC Monographs. Overall Evaluation of Carcinogenicity		
Not listed.		
OSHA Specifically Regulated Substances (29 CFR 1910.1001-1053)		
Not listed.		
US. National Toxicology Program (NTP) Report on Carcinogens		
Not listed.		
Reproductive toxicity	This product is not expected to cause reproductive or developmental effects.	
Specific target organ toxicity - single exposure	Causes damage to organs.	
Specific target organ toxicity - repeated exposure	Not classified.	
Aspiration hazard	Not an aspiration hazard.	
Chronic effects	Prolonged inhalation may be harmful.	

12. Ecological information

Ecotoxicity	The product is not classified as environmentally hazardous. However, this does not exclude the possibility that large or frequent spills can have a harmful or damaging effect on the environment.		
Components			
Potassium Hydroxide (CAS 1310-58-3)			
Aquatic			
Fish	LC50	Western mosquitofish (Gambusia affinis)	80 mg/l, 96 hours
Sodium hydroxide (CAS 1310-73-2)			
Aquatic			
Crustacea	EC50	Water flea (Ceriodaphnia dubia)	34.59 - 47.13 mg/l, 48 hours
Fish	LC50	Western mosquitofish (Gambusia affinis)	125 mg/l, 96 hours
Persistence and degradability	No data is available on the degradability of any ingredients in the mixture.		
Bioaccumulative potential	No data available.		
Mobility in soil	No data available.		
Other adverse effects	No other adverse environmental effects (e.g. ozone depletion, photochemical ozone creation potential, endocrine disruption, global warming potential) are expected from this component.		

13. Disposal considerations

Disposal instructions	Collect and reclaim or dispose in sealed containers at licensed waste disposal site. Incinerate the material under controlled conditions in an approved incinerator. Dispose of contents/container in accordance with local/regional/national/international regulations.
Local disposal regulations	Dispose in accordance with all applicable regulations.
Hazardous waste code	D002: Waste Corrosive material [pH <=2 or >=12.5, or corrosive to steel] The waste code should be assigned in discussion between the user, the producer and the waste disposal company.

Waste from residues / unused products Dispose of in accordance with local regulations. Empty containers or liners may retain some product residues. This material and its container must be disposed of in a safe manner (see: Disposal instructions).

Contaminated packaging Since emptied containers may retain product residue, follow label warnings even after container is emptied. Empty containers should be taken to an approved waste handling site for recycling or disposal.

14. Transport information

DOT

UN number UN3266
UN proper shipping name Corrosive liquid, basic, inorganic, n.o.s. (Potassium Hydroxide)
Transport hazard class(es)
Class 8
Subsidiary risk -
Label(s) 8
Packing group II
Special precautions for user Read safety instructions, SDS and emergency procedures before handling.
Special provisions B2, IB2, T11, TP2, TP27
Packaging exceptions 154
Packaging non bulk 202
Packaging bulk 242

Reportable Quantity (RQ) 1000# (Potassium Hydroxide); 1000# (Sodium hydroxide); 5000# (Phosphoric Acid)

DOT



15. Regulatory information

US federal regulations This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

Toxic Substances Control Act (TSCA)

TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)

Not regulated.

CERCLA Hazardous Substance List (40 CFR 302.4)

Potassium Hydroxide (CAS 1310-58-3) Listed.
Sodium hydroxide (CAS 1310-73-2) Listed.

SARA 304 Emergency release notification

Not regulated.

OSHA Specifically Regulated Substances (29 CFR 1910.1001-1053)

Not listed.

Superfund Amendments and Reauthorization Act of 1986 (SARA)

SARA 302 Extremely hazardous substance

Not listed.

SARA 311/312 Hazardous chemical

Yes

Classified hazard categories Corrosive to metal
Acute toxicity (any route of exposure)
Skin corrosion or irritation
Serious eye damage or eye irritation
Specific target organ toxicity (single or repeated exposure)

SARA 313 (TRI reporting)

Not regulated.

Other federal regulations**Clean Air Act (CAA) Section 112 Hazardous Air Pollutants (HAPs) List**

Not regulated.

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130)

Not regulated.

Safe Drinking Water Act (SDWA) Not regulated.**US state regulations****California Proposition 65**

California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65): This material is not known to contain any chemicals currently listed as carcinogens or reproductive toxins. For more information go to www.P65Warnings.ca.gov.

US. California. Candidate Chemicals List. Safer Consumer Products Regulations (Cal. Code Regs, tit. 22, 69502.3, subd. (a))

Sodium hydroxide (CAS 1310-73-2)

International Inventories

Country(s) or region	Inventory name	On inventory (yes/no)*
Australia	Australian Inventory of Chemical Substances (AICS)	No
Canada	Domestic Substances List (DSL)	No
Canada	Non-Domestic Substances List (NDSL)	No
China	Inventory of Existing Chemical Substances in China (IECSC)	No
Europe	European Inventory of Existing Commercial Chemical Substances (EINECS)	No
Europe	European List of Notified Chemical Substances (ELINCS)	No
Japan	Inventory of Existing and New Chemical Substances (ENCS)	No
Korea	Existing Chemicals List (ECL)	No
New Zealand	New Zealand Inventory	No
Philippines	Philippine Inventory of Chemicals and Chemical Substances (PICCS)	No
Taiwan	Taiwan Chemical Substance Inventory (TCSI)	No
United States & Puerto Rico	Toxic Substances Control Act (TSCA) Inventory	No

*A "Yes" indicates that all components of this product comply with the inventory requirements administered by the governing country(s)

A "No" indicates that one or more components of the product are not listed or exempt from listing on the inventory administered by the governing country(s).

16. Other information, including date of preparation or last revision

Issue date	01-24-2019
Revision date	07-31-2020
Version #	03

Disclaimer Americo Chemical Products, Inc. cannot anticipate all conditions under which this information and its product, or the products of other manufacturers in combination with its product, may be used. It is the user's responsibility to ensure safe conditions for handling, storage and disposal of the product, and to assume liability for loss, injury, damage or expense due to improper use. The information in the sheet was written based on the best knowledge and experience currently available.

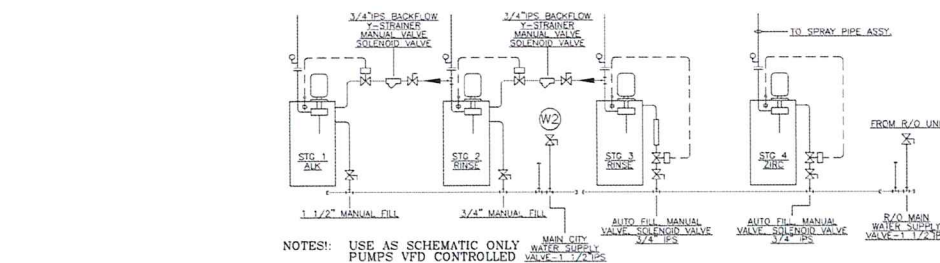
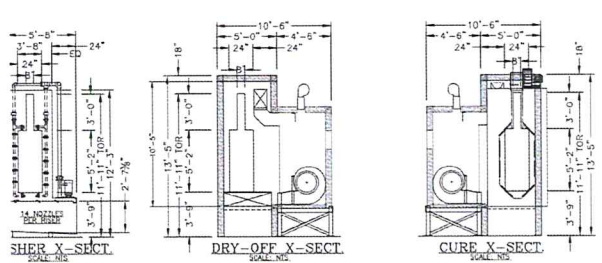
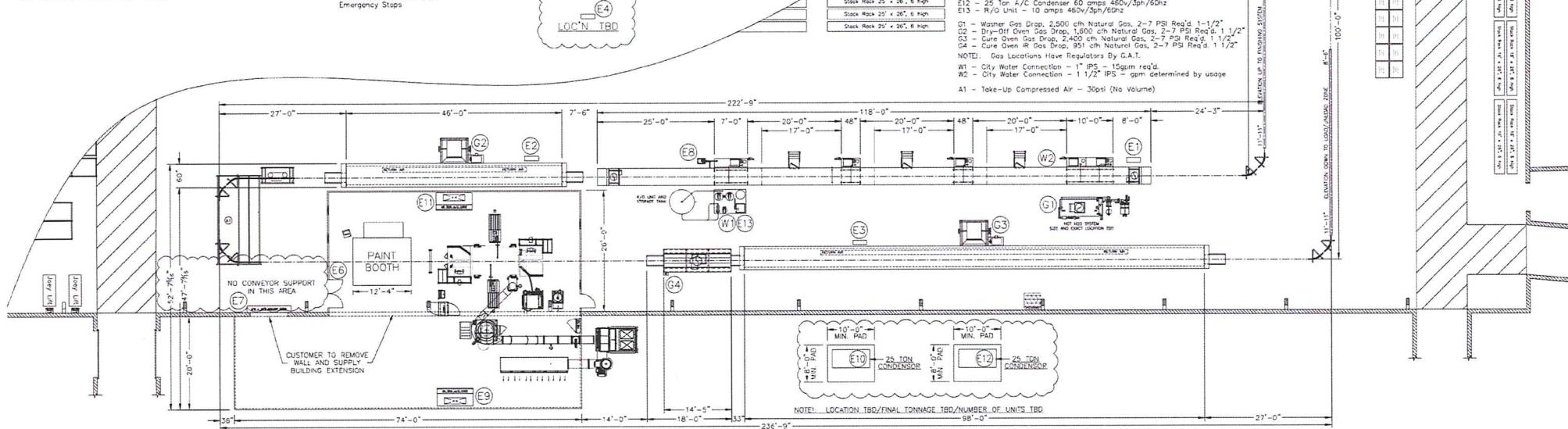
Revision information This document has undergone significant changes and should be reviewed in its entirety.

TREATMENT SYSTEM - 4 STAGE
 Stage 1 - Clean
 1096 gal Net Capacity 92 sec 140' F. max.
 7.5 hp Spray Pump - #316 S/S 210 gpm ea. @ 60' wc
 1400 - 55/40 Flat V Spray Nozzles
 Automatic Water Make-up from Stage #2
 Manual Quick Water Fill - 1 1/2"
 Stage 2 - Rinse
 438 gal Net Capacity 37 sec Ambient
 7.5 hp Spray Pump - #316 S/S 168 gpm ea. @ 60' wc
 56ea - 65/40 Flat V Spray Nozzles
 Automatic Water Make-up from Stage #3
 Manual Fresh Water Fill - 3/4"
 Stage 3 - Rinse
 438 gal Net Capacity 37 sec Ambient
 7.5 hp Spray Pump - #316 S/S 168 gpm ea. @ 60' wc
 56ea - 65/40 Flat V Spray Nozzles
 Automatic R/O Water Make-up
 Manual R/O Water Fill - 3/4"
 Virgin R/O Misting Riser w/ flow meter, pump controlled sol & ms. val.
 Stage 4 - 22c Dip
 767 gal Net Capacity 65 sec Ambient
 7.5 hp Spray Pump - #316 S/S 294 gpm ea. @ 60' wc
 88ea - 80/20 Flat V Spray Nozzles
 Automatic R/O Water Make-up
 Manual Quick R/O Water Fill - 1 1/2"
 Iron Cartridge Filter (5 micron)
 Seal System
 7.5 hp Stage #1 Process Pump - #316 S/S
 1ea - 10 hp Horizontal Hot Side Recirc Pump - Cast Iron
 250W Atmospheric Water Heater
 Pipe & Frame Heat Exchangers - #316 SS

DRY-OFF & CURE OVEN
Dry-Off Oven
 Single Pass
 Design Maximum Operating Temperature - 350° F.
 Design Product Throughput - 9,000 lbs/hr Aluminum
 Residence Time - 7 min. @ 6.5 FPM Conveyor Line Speed
 High Velocity Air Seals - 2 ea. with 2 hp Fans
 Exhaust Fan - 750 cfm Exh./2,044 cfm Purge - 1 Fan @ 1 hp - VFD Control
 Heat System - 1 ea. Radiator
 Eclipse 160kW Burner (or Equivalent) - 1 hp (max)
 #1-1/4" DWD Reducing Air Blower - 8,267 cfm - 7.5 hp
 1,600 cfm Natural Gas @ 2-7 PSI Supply Pressure
Cure Oven
 Single Pass
 Design Maximum Operating Temperature - 450° F.
 Design Product Throughput - 9,000 lbs/hr Aluminum
 Residence Time - 15 min. @ 6.5 FPM Conveyor Line Speed
 High Velocity Air Seals - 2 ea. with 2 hp Fans
 Exhaust Fan - 1,224 cfm Exh./2,044 cfm Purge - 1 Fan @ 1 hp - VFD Control
 Heat System - 1 ea. Radiator
 Eclipse 240kW Burner (or Equivalent) - 1 1/2 hp (max)
 #1-3/4" DWD Reducing Air Blower - 13,722 cfm - 10 hp
 2,400 cfm Natural Gas @ 2-7 PSI Supply Pressure
Gas Catalytic Oxidizer
 Single Pass
 Residence Time - 2.21 Minutes @ 6.5 FPM Conveyor Line Speed
 24 ea. 515 x 18" W 58,600 BTU Gas Catalytic Heater Pass
 w/ Electric Preheat Switch
 Exhaust Fan - 750 cfm - 1 hp
 951 cfm Natural Gas @ 2-7 PSI Supply Pressure
General
 Insulated Floor
 6" Thick Insulated Oven Walls and Roof
 Insurance Standards - FM
CONVEYOR
 Robotic 348" V Beam Conveyor - Floor Supported - 662 ft Running Length, Trays w/ Full Complement Bearings, No Seals, 1" Attachment & Carrier Pins on 24" centers
 Line Speed - 6.5 FPM Design Speed (3.25 to 9.75 FPM Range)
 Average Line Loading - 23 lbs/ft
 All 90° turns to be 36" Radius
 Cat Drive - A/C Variable Speed - 1 hp
 Air Operated Automatic Take-Up, 24" Travel
 Oven Expansion Joints as Required
 Automatic Chain Lubricator
 Emergency Stops

POWDER ROOM
 Walls - 3" Imp Panels (FM Approved) White Metal on Both Sides
 w/ 2" Structural Tube Framing
 Ceiling Tiles 1/4" Thick Class A FPD Tiles w/ Sonnabatt Insulation
 w/ 17" Clear Height Within Room
 LED 2500 Lumen Flush Mount Light Fixtures - 11 ea.
 3'-0" x 6'-0" Single Man Door - 1 ea.
 6'-0" x 6'-0" Double Man Door - 1 ea.
 8'-0" x 12'-0" Roll Up Door - 1 ea.
 24" W x 30" H Polycarbonate Viewing Window - 4 ea.
 2 ea. Spill System Air Condition System - 25 Ton Capacity
 w/ Controls - Pad Mounted
GENERAL NOTE
 1. All Specifications are subject to completion of System Engineering.
 2. Utility requirements are approximate. Actual requirements should not be greater than those stated and may be less.
IMPORTANT:
 Per NFPA 85 (1999), Section 3-4.1, "A Sufficient quantity of make-up air shall be admitted into the oven rooms and buildings to provide the air volume required for oven safety ventilation and adequate combustion air."
REQUIRED CUSTOMER INFORMATION
 The following information is required before detail engineering can begin. Please include the following information on the return copy of this approval drawing:
 Roof Height: 17'-6" (ft-in) Show Location on Drawing
 Clear Height: 15'-3" (ft-in) Show Location on Drawing
 Roof Slope: 1-12 Pitch Show Direction of Slope on Layout
 3 phase Voltage: 480
 Heat Source: Natural or Propane
 Fuel Supply Pressure: 5 PSI @ Equipment (2 psig minimum req'd)
 Building Access Size & Location:
 20' Wide x 14' High Overhead Door
 Clear path to equipment install location.
UTILITY LEGEND
 E1 - Washer - 70 amps 480v/3ph/60hz
 E2 - Dry-Off Oven 30 amps 480v/3ph/60hz
 E3 - Cure Oven 25 amps 480v/3ph/60hz
 E4 - PLC Interface Screen - 15 amps 120v/1ph
 E5 - Oiler - 15 amps 120v/1ph (Duplex Outlet)
 E6 - Powder Room Lighting 20 amps 120v/1ph
 E7 - 6"x12" Rollup Door 10 amps 120v/1ph
 E8 - 2pc Filter 7 amps 120v/1ph
 E9 - 25 Ton A/C Air Handler 15 amps 480v/3ph/60hz
 E10 - 25 Ton A/C Condenser 60 amps 480v/3ph/60hz
 E11 - 25 Ton A/C Air Handler 15 amps 480v/3ph/60hz
 E12 - 25 Ton A/C Condenser 60 amps 480v/3ph/60hz
 E13 - R/O Unit - 10 amps 480v/3ph/60hz
 W1 - Washer Gas Disp. 2,500 cfm Natural Gas, 2-7 PSI Reg'd 1-1/2"
 W2 - Dry-Off Oven Gas Disp. 1,900 cfm Natural Gas, 2-7 PSI Reg'd 1 1/2"
 W3 - Cure Oven Gas Disp. 2,400 cfm Natural Gas, 2-7 PSI Reg'd 1 1/2"
 W4 - Cure Oven R. Gas Disp. 951 cfm Natural Gas, 2-7 PSI Reg'd 1 1/2"
NOTE: Gas Locations Have Regulators By C.A.I.
 W1 - City Water Connection - 1" IPS - 15gpm req'd.
 W2 - City Water Connection - 1 1/2" IPS - gpm determined by usage
 A1 - Take-Up Compressed Air - 30psi (No Volume)

DRAPER APPROVAL
 REVIEW THIS DOCUMENT CAREFULLY. APPROVAL IS REQUIRED FOR MUTUAL PROTECTION OF PURCHASER AND SELLER.
 SATISFACTORY AND APPROVED FOR FABRICATION
 APPROVED FOR FABRICATION WITH CHANGES NOTED.
 UNSATISFACTORY, REQUIRES REVISED PRINT WITH CHANGES AS INDICATED.
 Draper, Inc.
 COMPANY
 SIGNATURE _____ DATE _____ TITLE _____



Revision	
No.	Description
1	FOR APPROVAL 5/24/23

GAT FINISHING SYSTEMS
 WWW.GATSYSTEMS.COM ST. LO
 636-343-6370
DRAPER APPROVAL
 FOR: _____
 JOB: _____
 THIS DRAWING IS OF A CONFIDENTIAL NATURE AND IS THE EXCLUSIVE PROPERTY OF GAT FINISHING SYSTEMS, INC. AND MAY NOT BE REPRODUCED, COPIED, OR DISCLOSED WITHOUT WRITTEN PERMISSION OF THE OWNER.
 SCALE: 3/32"=1'-0" DRAWN BY: JG/MVH
 DATE: 5/24/23 CHECKED BY: _____
 6 AS NOTED
 19067 1



Option 1: Non Phosphate

Stage 1

Alkaline Cleaner
Spray Clean NP3000LF

Stage 2

Rinse

Stage 3

Rinse

Stage 4

Zirconium
AMB 5147

"Stage 5"

RO Halo

