



June 26, 2024

Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, IN 46204-2251
Via e-mail: wwviolationresponse@idem.in.gov

RE: Bremen POTW Pretreatment Program Audit – NPDES Permit No. IN0020427

To Whom It May Concern:

The following is in response to the Inspection Summary / Deficiency Letter dated May 28, 2024. This letter was regarding the inspection that occurred on May 22 and 23, 2024.

Item #1: Control Mechanisms.

This item requires adjustments to the existing permits. The Town of Bremen will prepare updated permits as described below within the next 45 days and then transmit the amended permits to the Industrial users as soon as possible.

- a) Permits need requirement to transfer permits when ownership changes.
The town will modify the transfer section of the existing permits to include the requirement to have the existing user provide a copy of the existing permit to the new owner.
- b) Extension of records retention
The Town will update the three permits in question: Bremen Castings, RBC and Digger. Specifically the permits will be updated to include language that extends the period of records retention during any unresolved litigation regarding the discharge of pollutants by the Industrial User or the operation of the POTW Pretreatment Program or when requested by the Director or Regional Administrator to include the Bremen POTW, IDEM and the USEPA.
- c) Sample location designation for the Digger permit.
The Town of Bremen will update the permit for Digger to include the site plan indicating the sampling locations.
- d) Removal of exemptions for bypasses in permits.
The Town will amend the Industrial User permits to remove the exception for bypasses from the Civil and Criminal Penalties section of the permits.
- e) Slug plan notification requirements.
The Town of Bremen will amend the Industrial User permits sections on slug plans to require notification of any changes to the industrial facility within 30 days.

Item #2: Pretreatment Standards

These adjustments also affect the local pretreatment permits. The Town of Bremen will amend the existing permits to address these requirements. The first recommendation may take longer depending upon the industry's ability to provide the air flow scrubbed on a daily basis. It will be completed within six months of this response. The other two will be completed within 60 days of this response.



- a) Adjustment of Bremen Casting permit to address air volume calculations with monthly reports.

The Town of Bremen will require that the Bremen Castings provide daily SCF of the air scrubbed and production rates in its monthly reporting. The permit will be modified to include this requirement. The Town of Bremen will work with the industrial user to address the inclusion of this requirement.

- b) Local Limits

The Town of Bremen will amend all user permits to include all of the local limits or to provide waivers for those parameters not anticipated to be contained within the discharge flows.

- c) BCI limits updated to correct calculations.

The Town of Bremen will amend the BCI industrial permit to have the correct permit limits based upon the calculations.

Item #3: Compliance Monitoring

This section addresses sampling processes of the Pretreatment Program. The Town of Bremen will confirm that all sampling is completed as required by its permit. This item is already being completed and will continue to be completed as required.

- a) Mercury Monitoring at Digger

This item was corrected during the Audit. The Town of Bremen will continue to complete the required monitoring and will audit itself to confirm that all required monitoring is completed within the required timeframe.

Item #4: Enforcement

This section addresses compliance with updates of the Slug plans by industries within 90 days of any permit renewal. The Town will require the Industrial Users that have not updated the plans to provide these plans as required in the permit within 90 days of this response. Notices of Violations will be sent to the industries that did not submit the plans in accordance with the permits. It will be noted to the industries that updates are required with each new permit cycle. The notification to the industries will be completed within 14 days of this response. All updates are expected within 90 days after that date. The Town will confirm receipt of these plans within the designated time with IDEM.

Item #5: Recommendations

This section includes recommendations from IDEM for improvement of the local pretreatment program. The Town of Bremen will amend the items listed to address the recommendations from IDEM. It is agreed that these recommendations will improve the pretreatment program. These recommendations will be incorporated within 60 days of this response.

- a) RBC Addition to the Briefing memo of RBC regarding 40CFR Part 438

The Town will amend the permit of RBC to include a statement that RBC would be subject to the Categorical Standard, 40 CFR Part 438, should it be a direct discharger and that if that standard were to be modified to include indirect dischargers, that the standard would apply to its facility.

- b) Adjustment to Define Immediately to refer to within 24 hours.



The Town will amend permits to define the requirement for immediate notification to indicate that immediate notification means within no more than 24 hours of discovery.

- c) For Limits in Pounds, a compliance tracking spreadsheet converts concentration to pounds to more readily identify violations.

The Town of Bremen will update its electronic tracking sheet to include a column that calculates pounds from concentration automatically so that violations of the pounds standard can easily discerned.

Schutte has worked with the Town of Bremen to prepare this document and believes that all required information has been included in this submittal. Should you have any questions or comments regarding this response please feel free to contact this office at (317) 600- 9507 or by email: Scott@Schuttecompliance.com.

Respectfully Submitted,

Scott W. Schutte
Schutte Environmental Consulting and Compliance