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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Frank O'Bannon
Governor

John M. Hamilton
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

December 23, 1997

VIA CERTIFIED MAIL P 451 353 818

Ms. Debra Chelf, Divisional Environmental Engineer
Arvin North American Automotive
1531 13th Street
Columbus, Indiana 47201

Dear Ms. Chelf:

Re: Pretreatment Permit No. ~~INP 000168~~ *new*
~~Franklin, STP, Indiana~~

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 5-15. The enclosed IWP permit covers the discharge from your facility into the Franklin sewage treatment plant. All discharges from this facility shall be consistent with the terms and conditions of this permit.

One condition of your permit requires monthly reporting of several effluent parameters. Reporting is to be done on the enclosed monthly monitoring report (MMR) form. We have included enough forms to establish a supply for approximately four months of reporting. You should duplicate this form as needed for further reporting. Additionally, you will soon be receiving a supply of computer generated preprinted federal NPDES DMR forms. Both the state and federal forms need to be completed and submitted on a monthly basis. If you do not receive the preprinted DMR forms in a timely manner, please call Jeffery Ewick at 317/233-0676.

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.6. of this permit for further details. It is very important for your office and treatment plant operator to understand this part of the permit.

Also, you have the right to appeal the permit in whole or in part. Any appeal must be filed under procedures outlined in IC 4-21.5-3-7 and IC 13-15-6 (formerly IC 13-7-10-2.5). These procedures require that an appeal be initiated by filing a petition for administrative review with the Office of Environmental Adjudication, ISTA Building, 150 West Market Street, Suite 618, Indianapolis, IN 46204, within 18 days of mailing of this permit. A petition for administrative review constitutes a request for an adjudicative hearing.

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing: (i) the date the document is delivered to the Office of Environmental Adjudication (OEA); (ii) the date of the postmark on the envelope containing the document, if the document is mailed to the OEA by U.S. mail; or (iii) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier. The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by this permit, or otherwise entitled to review by law.

Additionally, IC 13-15-6 (formerly IC 13-7-10-2.5) requires that your petition include:

- 1) The name and address of the person making the request for administrative review;
- 2) The interest of the person making the request;
- 3) Identification of any persons represented by the person making the request;
- 4) The reasons, stated with particularity, for the request;
- 5) The issues, stated with particularity, proposed for consideration at the hearing; and
- 6) Identification of the permit terms and conditions which, in the judgment of the person making the request, would be appropriate to satisfy the requirements of the law governing permits of the type granted or denied by the Commissioner's action.

If a petition for review and a petition for stay of effectiveness are filed within 18 days of the mailing of this notice, then, the effective date of any part of this permit within the scope of the stay request is stayed fifteen (15) days. The portions of the permit for which a stay request has been filed will take effect at the expiration of the additional fifteen (15) days, unless or until an Environmental Law Judge stays this permit in whole or in part.

Pursuant to IC 4-21.5-3-5(d), the OEA will provide parties who request an appeal with notice of prehearing conferences, preliminary hearings, hearings, stays of orders disposing of all proceedings. Nonparties may also receive such notices by requesting copies of such notices from the OEA.

Ms. Debra Chelf

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If you have any questions concerning this permit, please contact Kevin Cohoon at this address or phone him at 317/233-0570.

If you have procedural questions regarding the filing of a petition, you may contact the OEA at (317) 232-8591.

Sincerely,

A handwritten signature in black ink, appearing to read "Reggie Baker Jr.", with a stylized flourish at the end.

Reggie Baker Jr., Chief
Pretreatment & Urban Wet Weather Section
Office of Water Management

RB:kc

Enclosures:

cc: Johnson County Health Department
City of Franklin
Certified Operator, Franklin STP

STATE OF INDIANA

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AUTHORIZATION TO DISCHARGE UNDER THE
327 IAC 5-15 PERMIT PROGRAM

INDUSTRIAL WASTEWATER PRETREATMENT (IWP) PERMIT

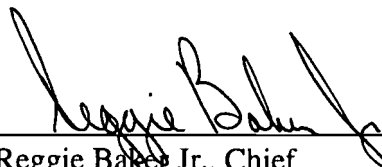
Arvin North American Automotive, in accordance with the provisions of IC 13-15, is authorized to discharge from the facility into the **Franklin** sewage treatment system. The permittee is required to comply with effluent limitations, monitoring requirements, and other conditions set forth in Parts I and II hereof.

EFFECTIVE DATE: February 1, 1998

EXPIRATION DATE: November 30, 2002

NOTE: In order to receive authorization to discharge beyond the date of expiration, the permittee shall submit a renewal IWP application to the Pretreatment Group, Permits Section, Office of Water Management, no later than 180 days prior to the date this permit expires. Failure to do so will let the permit expire, leaving the discharger without a permit and, if the discharge continues, will be an enforceable offense.

Signed this 23rd day of December, 1997, for the Indiana
Department of Environmental Management.



Reggie Baker Jr., Chief
Pretreatment & Urban Wet Weather Section
Office of Water Management

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge from outfalls 001, 002, and 003. Such discharge shall be limited and monitored by the permittee as specified below: [1]

<u>Parameter</u>	<u>Discharge Limitations</u>		<u>Unit</u>	<u>Monitoring Requirements</u>	
	<u>Monthly Average</u>	<u>Daily Maximum</u>		<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow [2]	Report	Report	MGD	Daily	24-Hr. Total
pH	N/A	5.0-10.0	s.u.	1 X Week	Grab
Oil and Grease [O&G]	N/A	100.00	mg/l	1 X Week	Grab

- [1] Sample site 001 shall be designated as the combined wastestreams from outfalls 001, 002, and 003 at the point of discharge from outfall 003 to the POTW.
- [2] The flow at the sample site must be measured and recorded by valid flow-measurement devices, not estimated.

NOTE: All samples at all sites will be taken as grab samples due to low flows or parameter requirements.

2. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge from outfall 004. Such discharge shall be limited and monitored by the permittee as specified below: [1]

<u>Parameter</u>	<u>Discharge Limitations</u>		<u>Unit</u>	<u>Monitoring Requirements</u>	
	<u>Monthly Average</u>	<u>Daily Maximum</u>		<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow [2]	Report	Report	MGD	Daily	24-Hr. Total
pH	N/A	5.0-10.0	s.u.	1 X Week	Grab
Oil and Grease [O&G]	N/A	100.00	mg/l	1 X Week	Grab

- [1] Sample site 002 shall be designated as the combined wastestreams from outfall 004 at the point of discharge to the POTW.
- [2] The flow at the sample site must be measured and recorded by valid flow-measurement devices, not estimated.

3. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge from outfall 005. Such discharge shall be limited and monitored by the permittee as specified below: [1]

<u>Parameter</u> [2]	<u>Discharge Limitations</u>		<u>Unit</u>	<u>Monitoring Requirements</u>	
	<u>Monthly Average</u>	<u>Daily Maximum</u>		<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow [3]	Report	Report	MGD	Daily	24-Hr. Total
pH	N/A	5.0-10.0	s.u.	1 X Week	Grab
Total Chromium [Cr(T)]	N/A	2.18	mg/l	1 X Month	Grab
Copper [Cu]	N/A	0.28	mg/l	1 X Month	Grab
Biochemical Oxygen Demand [BOD5]	N/A	Report	mg/l	1 X Month	Grab
Oil and Grease [O&G]	N/A	100.00	mg/l	1 X Week	Grab

- [1] Sample site 003 shall be designated as the combined wastestreams from outfall 005 at the point of discharge to the POTW.
- [2] All metals shall be analyzed as Total Recoverable Metals.
- [3] The flow at the sample site must be measured and recorded by valid flow-measurement devices, not estimated.

B. DISCHARGE PROHIBITIONS

1. General Prohibitions:

The permittee shall not discharge any pollutants into the POTW that pass through, or interfere with, the operation or performance of the POTW.

2. Specific Prohibitions:

In addition to I.B.1 above, the permittee shall not discharge:

- a. pollutants that create a fire or explosion hazard in the POTW;
- b. pollutants that will cause corrosive structural damage to the POTW, including particularly discharges with pH lower than 5.0;
- c. solid or viscous pollutants in amounts that will cause obstruction to the flow in sewers, or other interference with the operation of the POTW;
- d. any pollutant, including oxygen demanding pollutants, e.g. biochemical oxygen demand (BOD), released in a discharge at a flow rate and /or pollutant concentration as to cause interference in the POTW;
- e. heat in amounts that will inhibit biological activity in the POTW treatment plant resulting in interference or causing damage. In no case shall heat be introduced in such quantities that the temperature exceeds 40° C (104° F) at the POTW treatment plant unless the Commissioner, upon request of the POTW, approves alternate temperature limits; or
- f. pollutants that 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.

C. MONITORING AND REPORTING

1. Representative Sampling

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

2. Reporting

The permittee shall submit monitoring reports to the Indiana Department of Environmental Management and the municipal treatment plant containing results obtained during the previous month and shall be postmarked no later than 28th day of the month following each completed monitoring period. The first report shall be postmarked 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 (U.S. EPA) and the Monthly Monitoring Report (IDEM). All reports shall be sent to the following:

STATE ADDRESS

Technical Support Branch
Office of Water Management
IDEM
100 North Senate Avenue
Indianapolis, IN 46206-6015

MUNICIPAL ADDRESS:

Certified Operator
Franklin WWTP
City of Franklin
P. O. Box 280
Franklin, Indiana 46131

3. Definitions

a. Effluent Limitations

(1) The permittee shall not discharge pollutant parameters in concentrations and/or quantities that exceed the Discharge Limitations in Part I.A.

(2) Daily Discharge- The total mass or average concentration or other measurement of pollutant specified (e.g., pH, temperature) that is discharged over the calendar day or any other 24-hour period that reasonably represents the calendar day for purposes of sampling.

(3) Daily Maximum (Discharge) Limitation- The maximum allowable daily discharge.

- (4) Monthly Average Discharge (Average Monthly Discharge)-The total mass or flow-weighted concentration of all daily discharges sampled and/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.
- (5) Monthly Average (Discharge) Limitation- The maximum allowable monthly average discharge for any calendar month.

b. Publicly Owned Treatment Works ("POTW")

A treatment works owned by the State or a municipality, except that it does not include pipes, sewers or other conveyances not connected to a facility providing treatment. The definition includes any devices and systems used in the storage, treatment, recycling and reclamation of municipal sewage or compatible industrial wastes. "POTW" also means the municipality that has jurisdiction over the indirect discharges to and the discharges from such treatment works.

4. Test Procedure

Except where specified otherwise herein, the permittee shall monitor the discharge using sampling and analytical methods that conform to 40 CFR 136, current version. Equivalent methods are allowable if the permittee obtains prior written approval from IDEM and the U.S. Environmental Protection Agency.

5. Recording the Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

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

6. 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 Indiana Department of Environmental Management Monthly Monitoring Report. Such increased frequency shall also be indicated.

7. Records Retention

All records and information resulting from the monitoring activities required by this permit, including all records of analyses performed and calibration and maintenance of instrumentation and recording from continuous monitoring instrumentation, shall be retained for a minimum of three (3) years. The retention period may be extended during the course of any unresolved litigation regarding the discharge of pollutants by the permittee or when requested by the Assistant Commissioner of the Office of Water Management.

D. 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 other requirements of the Act then applicable.

PART II
INDUSTRIAL WASTEWATER PRETREATMENT PERMIT

A. MANAGEMENT REQUIREMENTS

1. Change in Discharge

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansions, production increases, or process modifications which will result in new, different or increased discharges of pollutants must be reported by submission of a new 327 IAC 5-15 permit application at least 180 days prior to a planned expansion or modification or, if such changes will not violate the effluent limitations specified in this permit, by notice to the permit issuing authority of such changes. Following such notice, the permit may be modified to specify and limit any pollutants not previously limited. Any change in discharge must also be reported to the authorized agent for the city listed under Part I.C.2, above.

2. 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.

3. Operator Certification

The permittee shall have the waste treatment facilities under the direct supervision of an operator certified by the Indiana Department of Environmental Management as required by IC 13-18-11-11.

4. Noncompliance Notification

If, for any reason, the permittee does not comply with or will be unable to comply with any daily maximum effluent limitation specified in this permit, the permittee shall provide the Indiana Department of Environmental Management and the sewage treatment plant with the following information, in writing, within five (5) days after becoming aware of such condition:

- a. a description of the discharge and cause of noncompliance; and
- b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time and noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge.

5. Facilities Operation

The permittee shall at all times maintain in good working order and operate as efficiently as possible, all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

6. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the sewage treatment plant resulting from noncompliance with any effluent limitations specified in this permit, including such accelerated or additional monitoring necessary to determine the nature and impact of the noncomplying discharge.

7. Bypassing

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except (i) where it would be unavoidable to prevent loss of life or severe property damage, or (ii) where excessive storm drainage or runoff would damage any facilities necessary for compliance with the effluent limitations and prohibitions of this permit. The permittee shall promptly notify the Indiana Department of Environmental Management and the sewage treatment plant, by telephone and in writing, of such diversion or bypass.

8. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed from or resulting from treatment or control of wastewaters shall be disposed of in a manner such as to be in compliance with all Indiana statutory provisions and regulations relative to refuse, liquid and/or solid waste disposal.

9. 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.

B. RESPONSIBILITIES

1. Right of Entry

The permittee shall allow the Commissioner of the Indiana Department of Environmental Management, and/or the Commissioner's authorized representatives and/or the authorized representatives of the city, upon the presentation of the credentials:

- a. to enter upon the permittee's premises where an effluent source is located or in which any records are required to be kept under the terms and conditions of this permit; and
- b. at reasonable times to have access to and copy any records required to be kept under the terms of conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any discharge of pollutants.

2. Transfer of Ownership or Control

In the event of any change in control or ownership of facilities from which the authorized discharge emanates, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Indiana Department of Environmental Management and the city. This notification shall contain a specific date for transfer of permit responsibility and coverage between the current and new permittees.

3. Penalties for False Reporting

Knowingly making any false statement on any report required by this permit may result in the imposition of criminal penalties as provided for in IC 13-30-6-2.

4. Permit Modification

After notice and opportunity for hearing, this permit may be modified, suspended, or revoked, in whole or in part, during its term for cause including, but not limited to, the following:

- a. violation of any terms or conditions of this permit;
- b. obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- c. a change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

5. Toxic Pollutants

Notwithstanding Part II.B.4 above, if a toxic effluent pretreatment standard or prohibition (including any schedule of compliance specified in such effluent pretreatment standard or prohibition) is established under Section 307(b) of the Clean Water Act for a toxic pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revised or modified in accordance with the toxic effluent pretreatment standard or prohibition and the permittee so notified.

6. Civil and Criminal Liability

Except as provided in permit conditions on "Bypassing" (Part II.A.7) and "Power Failures" (Part II.A.9), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond his control, such as accidents, equipment breakdowns, or labor disputes.

7. 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.

8. 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.

9. 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 is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

10. Construction Permit

The permittee shall not construct, install, or modify any water pollution control facilities without a valid construction permit issued by the Indiana Department of Environmental Management.

BRIEFING MEMO

Permit No. INP 000168

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Permittee:

Arvin North American Automotive
Franklin Plant
1001 Hurricane Street
Franklin, Indiana 46131

County: Johnson

Receiving POTW:

Franklin Wastewater Treatment Plant
City of Franklin
P. O Box 280
Franklin, Indiana 46131

NPDES Permit No. 0021181

Facility Description:

The permittee manufactures exhaust systems for the automotive industry. Manufacturing processes include: cleaning, welding, hydrostatic testing, deburring, and painting. The plant normally operates 16 hours/day, 6 days/week.

Although the combined process wasteflows at Arvin are not subject to National Categorical Pretreatment Standards, an IWP permit is needed for this facility because: (i) it is defined as a Significant Industrial User in 40 CFR 403.3 (t)(ii) by discharging an average of 25,000 gallons per day or more of process wastewater to the POTW and therefore (ii) it has the potential to upset the Franklin STP. The flows are subject to any local ordinance limits and water quality-based limits that apply where the plant line meets the city sewer (end-of -pipe).

Receiving Sewage Treatment Plant (STP):

The permittee discharges to the Franklin STP: a 4.0 MGD Class III plant with grit removal, primary clarification, activated sludge, nitrification, effluent disinfection (chlorination and SO₂ dechlorination) and aerobic digestion. The STP also serves KYB (INP 000086), Kawneer (INP 000055), Electro-Spec (INP 000078), Warrior Oil (INP 000112), Mitsubishi (INP 000067), and Franklin Power Products #1 and #2 (INP 000172, INP 000173).

The STP discharges to Young's Creek (Q_{7,10} = 0.8 CFS), a tributary to Sugar Creek, a tributary to Driftwood River. The in-stream hardness is 322.00 mg/l at the nearest downstream monitoring station (SGR1 at Sugar Creek in Edinburgh on the road to Atterbury mile point 1; 50th %ile of 11 data points collected January 1, 1989 through December 31, 1993).

BRIEFING MEMO

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Discharge Description:

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

<u>Source</u>	<u>Flow (GPD)</u>
Process Wastestream #1:	7,500 (1)
Process Wastestream #2:	40,046 (2)
Process Wastestream #3:	150 (3)
Cleaning/Mop Water	1,204
Sanitary:	40,336

- (1) Process Wastestream #1 is wastewater generated from a fresh water rinse after press operations.
- (2) Process Wastestream #2 is wastewater generated from the Cadillac paint line. Parts are cleaned in an alkaline wash and rinsed. The wash tank is batch discharged every 2 weeks.
- (3) Process Wastestream #3 is wastewater generated from the leak testing operations. Parts are compressed with air and immersed in a fresh water tank to test for leaks. Also, forklift and floor scrubber cleaning and maintenance are performed in this area.

Treatment Description:

Water that is used to clean machinery which use oil and lubricants is cleaned and discharged to an evaporation system. Water is evaporated and the remaining sludge is hauled off-site for disposal. All other wastewater is discharged without treatment.

BRIEFING MEMO

Permit No. INP 000168
Page 3 of 7

Selection of Parameters:

This permit regulates the substances and parameters in the permittee's raw wastewater that:

1. are subject to an applicable categorical standard, and/or
2. could: (i) constitute a Prohibited Discharge; or (ii) violate a discharge limit in the local sewer ordinance. The permit must ensure compliance with all applicable pretreatment requirements and standards specified in 327 IAC 5-12 [327 IAC 5-15-7(a)(1)], including local ordinance limits [327 IAC 5-12-2(c)].

Prohibited Discharges [40 CFR 403.5 and 327 IAC 5-12-2] are discharges of pollutants that constitute a pass through and/or an interference to the municipal sewerage system. A pass through is something that passes through the STP without adequate treatment, i.e. it causes the STP to violate a State or Federal water quality requirement that applies to the final STP discharge.

An interference is something that impairs any operation of the sewerage system (including maintenance and/or any mechanical, chemical or biological processes at the STP, collection system and/or any appurtenances). Interference also includes contamination that causes the municipal sludge to violate its disposal requirements.

The substances and parameters present in the process wastewaters are identified in: (i) the applicable categorical standards; and (ii) information provided by the permittee.

Selection of Concentration Limits:

The permittee's discharge must comply with: (i) the General Discharge Prohibitions and (ii) any existing local ordinance limits. Whenever a pollutant parameter is subject to more than one limit, the more stringent limit applies, becoming the permit limit for the parameter.

BRIEFING MEMO

Permit No. INP 000168

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Self-Monitoring Frequency:

To assure compliance with the limits and terms of this permit, State rules [327 IAC 5-15-9 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.

For pollutants that could be discharged at prohibited levels, the minimum sampling frequency is based on the guidance document from this office, "Procedures for Determining Industrial Self-Monitoring Frequency," (September 24, 1987). It specifies an automatic minimum frequency of once/week, which is increased or decreased by the following factors:

1. pollutant type (increase frequency for toxic pollutants, decrease for conventional pollutants);
2. compliance history (increase frequency if compliance history is poor, decrease if good);
3. discharge flow as % of STP influent flow (increase frequency if flow over 5% of STP influent);
4. discharge strength (increase frequency for "high" conventional discharges and metals above 10 mg/l); and
5. discharge frequency (increase frequency for intermittent or batch flows).

If a pollutant could not be discharged at prohibited levels by the permittee, but is still subject to a categorical standard, the permit requires only the minimum frequency mandated by Federal Regulation [40 CFR 403.12(e)(1)].

BRIEFING MEMO

Permit No. INP 000168

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Summary of Limits and Basis for Each:

The table below summarizes the permit limits at the designated sample site 001 based on the considerations discussed herein. Sample site 001 is designated as the combined flows from outfalls #1, #2, and #3.

<u>Parameter</u>	<u>Discharge Limitations</u>		<u>Unit</u>	<u>Monitoring Requirements</u>	
	<u>Monthly Average</u>	<u>Daily Maximum</u>		<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow [1]	Report	Report	MGD	Daily	24-Hr. Total
pH[2][3]	N/A	5.0-10.0	s.u.	Daily	Grab
Oil and Grease [O&G]	N/A	100.00[2]	mg/l	1 X Week	Grab

- [1] The flow at the sample site must be measured and recorded using valid flow-measurement devices, not estimated.
- [2] Based on local ordinance [Franklin Ordinance No. 86-19(adopted June 9, 1986)].
- [3] In no case, shall the permittee discharge any pollutants that will cause corrosive structural damage to the POTW, including particularly discharges with pH lower than 5.0 [327 IAC 5-12-2(b)(2) and 40 CFR 403.5(b)(2)].

NOTE: All samples at all sites will be taken as grab samples due to low flows or parameter sampling requirements.

BRIEFING MEMO

Permit No. INP 000168

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The table below summarizes the permit limits at the designated sample site 002 based on the considerations discussed herein. Sample site 002 is designated as wastewater from process wastestream #2 (outfall #4).

<u>Parameter</u>	<u>Discharge Limitations</u>		<u>Unit</u>	<u>Monitoring Requirements</u>	
	<u>Monthly Average</u>	<u>Daily Maximum</u>		<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow [1]	Report	Report	MGD	Daily	24-Hr. Total
pH[2][3]	N/A	5.0-10.0	s.u.	Daily	Grab
Oil and Grease [O&G]	N/A	100.00[2]	mg/l	1 X Week	Grab

- [1] The flow at the sample site must be measured and recorded using valid flow-measurement devices, not estimated.
- [2] Based on local ordinance [Franklin Ordinance No. 86-19(adopted June 9, 1986)].
- [3] In no case, shall the permittee discharge any pollutants that will cause corrosive structural damage to the POTW, including particularly discharges with pH lower than 5.0 [327 IAC 5-12-2(b)(2) and 40 CFR 403.5(b)(2)].

BRIEFING MEMO

Permit No. INP 000168

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The table below summarizes the permit limits at the designated sample site 003 based on the considerations discussed herein. Sample site 003 is designated as wastewater from process wastestream #3 (outfall #5).

<u>Parameter</u>	<u>Discharge Limitations</u>		<u>Unit</u>	<u>Monitoring Requirements</u>	
	<u>Monthly Average</u>	<u>Daily Maximum</u>		<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow [1]	Report	Report	MGD	Daily	24-Hr. Total
pH[2][3]	N/A	5.0-10.0	s.u.	Daily	Grab
Total Chromium [Cr(T)]	N/A	2.18[2]	mg/l	1 X Month	Grab
Copper [Cu]	N/A	0.28[2]	mg/l	1 X Month	Grab
Biochemical Oxygen Demand [BOD5]	N/A	Report	mg/l	1 X Month	Grab
Oil and Grease [O&G]	N/A	100.00[2]	mg/l	1 X Week	Grab

- [1] The flow at the sample site must be measured and recorded using valid flow-measurement devices, not estimated.
- [2] Based on local ordinance [Franklin Ordinance No. 86-19(adopted June 9, 1986)].
- [3] In no case, shall the permittee discharge any pollutants that will cause corrosive structural damage to the POTW, including particularly discharges with pH lower than 5.0 [327 IAC 5-12-2(b)(2) and 40 CFR 403.5(b)(2)].

Duration of Permit:

A permit lifetime of five years is proposed. Drafted by Kevin Cohoon.

Date:

BRIEFING MEMO

Permit No. INP 000168

POST PUBLIC NOTICE ADDENDUM: December 10, 1997

1. Arvin may use their intake water meter to measure total flow.
2. Monitoring for pH will be performed on a weekly basis at each sample site.
3. On page 2 of the Briefing Memo, the Treatment Description was incorrect. The evaporator has not been installed and is only a possible plan for further treatment of the wastewater. The only treatment currently performed on the wastewater is the pH adjustment of the Cadillac line wash tank prior to discharge.