



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

VIA ELECTRONIC MAIL

April 5, 2013

Ryan Albright
Material Handling Exchange, Incorporated
1800 Churchman Avenue
Indianapolis, Indiana 46203

Dear Mr. Albright:

Re: Final IWP Permit No. INP000627
Material Handling Exchange, Incorporated
Franklin, Indiana
Johnson 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 Franklin 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. These forms are available on the internet at the following web site:

<http://www.in.gov/idem/5104.htm>

Additionally, you will soon be receiving a supply of the computer generated preprinted federal IWP DMR forms. Both the state and federal forms need to be completed and submitted on a routine basis. If you do not receive the preprinted DMR forms in a timely manner, please call this office at 317/232-8742.

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.

A response to the comments contained in the letter dated March 1, 2013, from Raymond Kassab of SES Environmental, pertaining to the draft IWP permit is contained in the Post Public Notice Addendum. The Post Public Notice Addendum is located at the end of the Briefing Memo.

Ryan Albright
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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 eighteen (18) days of the mailing of this letter by filing at the following address:

Office of Environmental Adjudication
Indiana Government Center North
100 North Senate Avenue, Room 501
Indianapolis, IN 46204

Please send a copy of any written appeal to me at the IDEM, Office of Water Quality - Mail Code 65-42, 100 North Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions concerning the permit, please contact Holly Zurcher at 317/234-2122 or by email at hzurcher@idem.in.gov. Questions concerning appeal procedures should be directed to the Office of Environmental Adjudication, at 317/232-8591.

Sincerely,



Paul Higginbotham, Chief
Permits Branch
Office of Water Quality

Enclosures

cc: Johnson County Health Department
Rick Littleton, Franklin POTW
Raymond Kassab, SES Environmental
Leigh Voss, OWQ Municipal Permits Section
Jerry Dittmer, OWQ Municipal Permits Section

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, **Material Handling Exchange, Incorporated** (hereinafter referred to as the permittee) is authorized to discharge, from the facility located at 1001 Hurricane Street, Franklin, Indiana, Johnson County into the **Franklin 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: April 1, 2013

EXPIRATION DATE: March 31, 2018

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.

Signed on April 5, 2013 for the Indiana Department of Environmental Management.



Paul Higginbotham, 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]. Such discharge shall be limited and monitored by the permittee as specified below:

Table 1

<u>Parameter [2]</u>	<u>Discharge Limitations</u>		<u>Unit</u>	<u>Monitoring Requirements</u>	
	<u>Daily Maximum[6]</u>	<u>Monthly Average[6]</u>		<u>Measurement Frequency[4]</u>	<u>Sample Type [3]</u>
Flow[5]	Report	Report	MGD	Daily	24-Hr. Total
Cadmium [Cd]	0.11	0.07	mg/l	1 X Month	24 Hr. Comp.
Total Chromium [Cr(T)]	2.77	1.71	mg/l	1 X Month	24 Hr. Comp.
Copper [Cu]	3.38	2.07	mg/l	1 X Month	24 Hr. Comp.
Lead [Pb]	0.69	0.43	mg/l	1 X Month	24 Hr. Comp.
Nickel [Ni]	3.98	2.38	mg/l	1 X Month	24 Hr. Comp.
Silver [Ag]	0.43	0.24	mg/l	1 X Month	24 Hr. Comp.
Zinc [Zn]	2.61	1.48	mg/l	1 X Month	24 Hr. Comp.
Total Cyanide [CN(T)][8]	1.20	0.65	mg/l	1 X Month	Grab
TTO[9]	2.13	-----	mg/l	2 X Year	Grab

Table 2

<u>Parameter</u>	<u>Quality or Concentration</u>		<u>Unit</u>	<u>Monitoring Requirements</u>	
	<u>Daily Minimum</u>	<u>Daily Maximum</u>		<u>Measurement Frequency</u>	<u>Sample Type</u>
pH[7]	5.0	10.0	s.u.	Daily	Grab

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

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

- [3] The daily composites must be flow-proportional samples consisting of aliquots withdrawn throughout the daily discharge period. The aliquots may be: (i) uniform aliquots withdrawn at uniform flow intervals; or (ii) flow-proportional aliquots withdrawn at uniform time intervals.
- [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] The flow must be measured and recorded using valid flow measurement devices, not estimated. The flow monitoring device must be calibrated at least once annually.
- [6] Based on categorical standards [40 CFR 433.17]. The Standard is concentration-based (mg/l).
- [7] Based on local ordinance [Franklin Ordinance No. 98-7].
- [8] 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. Since the permittee does not use CN, the CN(T) samples should be collected at the end-of-process site.
- [9] The Total Toxic Organics (TTO) parameter is defined as the sum of the 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") on Pages 9-10 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 one hundred forty (140) degrees Fahrenheit (sixty (60) degrees Celsius) 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 forty (40) degrees Celsius or one hundred four (104) degrees Fahrenheit 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:
 - (i) NPDES permit requirements; and
 - (ii) requirements for sewage sludge use or disposal, in the case of interference.

(B) DEFINITIONS

(1) 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.

(2) Daily Maximum (Discharge) Limitation

The maximum allowable daily discharge.

(3) Monthly Average Discharge (Average Monthly Discharge)

The total mass or 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.

(4) Monthly Average (Discharge) Limitation

The maximum allowable monthly average discharge for any calendar month.

(5) Interference

"Interference" means a discharge that, alone or in conjunction with a discharge or discharges from other sources, does one (1) of the following:

- (a) Inhibits or disrupts the POTW, its treatment processes or operations, its sludge processes, or its selected sludge use or disposal methods.
- (b) Causes a violation of any requirement of the POTW's NPDES permit, including an increase in the magnitude or duration of a violation.

(c) Prevents 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:

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

(2) 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 any state sludge management plan prepared pursuant to Subtitle D of the SWDA (42 U.S.C. 6941).

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

(4) 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 5-18-10.

(9) 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 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 that has jurisdiction over the indirect discharges to and the discharges from such 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 City of Franklin 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. In lieu of mailing paper reports the permittee may submit its reports to IDEM electronically by using the NetDMR application, upon registration and approval receipt. Electronically submitted reports (using NetDMR) have the same deadline as mailed reports. These reports shall include, but not necessarily be limited to, the Discharge Monitoring Report and the Monthly Monitoring Report. All reports shall be sent to the following:

IDEM:

Compliance Data Section
Office of Water Quality
IDEM Mail Code 65-42
100 North Senate Avenue
Indianapolis, IN 46204

City of Franklin:

Certified Operator
City of Franklin POTW
796 South State Street
Franklin, Indiana 46131

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 (1), the commissioner may specify in a permit the test procedure used in developing the data on which an effluent limitations guideline was based, or specified by the standards and guidelines.

(4) Recording the Monitoring Results

For each measurement or sample taken pursuant to the requirements of this permit, 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) and time(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 and the City of Franklin 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.

(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 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 other 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.

(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:

- (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 of 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 City of Franklin 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.
- (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.

(7) Upset

- (a) "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with any pretreatment standards or requirements 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.

(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 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) Operator Certification

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 and 327 IAC 5-22. In order to operate a wastewater treatment plant the operator shall have qualifications as established in 327 IAC 5-22-7.

(13) Construction Permit

The permittee shall not construct, install, or modify any water pollution control facility except in accordance with 327 IAC 3. 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 City of Franklin as long as the local requirements are not less stringent than any set forth in this permit.

(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 operation facilities employing more than two hundred fifty (250) persons or having gross annual sales or expenditures exceeding twenty-five million dollars (\$25,000,000) (in second-quarter 1980 dollars), if 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 control authority.

- (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 control authority prior to or together with any reports to be signed by an authorized representative.
- (b) An industrial user subject to the reporting requirements of this section shall maintain records of the monitoring activities in accordance with 327 IAC 5-2-14. These records shall be made available, upon request, to the commissioner, the regional administrator, and the POTW to which the industrial user discharges its wastewater.
- (c) A POTW to which reports are submitted by an industrial user under this section shall retain such reports for a minimum of three (3) years and shall make such reports available for inspection and copying by the commissioner and the regional administrator. This period of retention shall be extended during the course of any unresolved litigation regarding the discharge of pollutants by the industrial user, the operation of the approved POTW pretreatment, or when requested by the commissioner or the regional administrator.
- (d) 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.
- (e) A report required of a POTW by 40 CFR 403.12 must be signed by a responsible corporate officer, ranking elected official, or other duly authorized employee if that employee is responsible for the overall operation of the POTW. If an employee is authorized to submit such reports, a copy of the written authorization designating the employee must be submitted to the commissioner.
- (f) An industrial user who wishes to demonstrate the affirmative defense of upset for noncompliance with any pretreatment standard or requirement shall, as provided in 327 IAC 5-18-3, comply with the reporting requirements and conditions under Part II.A.7 of this permit.
- (g) An industrial user must report incidents of bypass or intent to bypass in accordance with Part II.A.8 of this permit.
- (6) Penalties for False Reporting

IC 13-30 and 327 IAC 5-2-8(14) 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, shall, upon conviction, be punished by a fine, imprisonment, or by both.

(7) Penalties for Falsifying, Tampering, or Knowingly Rendering Inaccurate a Monitoring Device or Method

In accordance with 327 IAC 5-2-8(9), the permittee shall comply with monitoring, recording, and reporting requirements of this permit. The Clean Water Act, as well as IC 13-30-10, provides that any person who knowingly or intentionally (a) destroys, alters, conceals, or falsely certifies a record that is required to be maintained under the terms of a permit issued by the department; and may be used to determine the status of compliance, (b) renders inaccurate or inoperative a recording device or a monitoring device required to be maintained by a permit issued by the department, or (c) falsifies testing or monitoring data required 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 is 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

I.	ETHERS	V.	AROMATICS
	Ether, bis(2-chloroethyl) Ether, bis(2-chloroisopropyl) Ether, 2-chloroethyl vinyl Ether, 4-chlorophenyl phenyl Ether, 4-bromophenyl phenyl Bis (2-chloroethoxy) methane		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-
II.	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		
III.	NITROGEN COMPOUNDS	VI.	POLYNUCLEAR AROMATIC HYDROCARBONS (PAHs)
	Nitrosamine, dimethyl- Nitrosamine, diphenyl- Nitrosamine, di-n-propyl- Benzidine Benzidine, 3,3'-dichloro- Hydrazine, 1,2-diphenyl- Acrylonitrile		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
IV.	PHENOLS	VII.	PCB's
	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		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

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

Material Handling Exchange, Incorporated

February 2013

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:	Material Handling Exchange, Incorporated 1800 Churchman Avenue Indianapolis, Indiana 46203
Permit Information:	Permit Number: INP000627
Source Contact:	Ryan Albright, Manager (317)788-7225 ralbright@m-h-e.com
Source Location:	1001 Hurricane Street Franklin, Indiana 46131 Johnson County
Receiving POTW:	Franklin POTW 796 South State Street Franklin, Indiana 46131 NPDES Permit #IN0021181
Proposed Action:	New Permit Date Application Received: January 29, 2013
Source Category	Industrial Pretreatment
Permit Writer:	Holly Zurcher (317) 234-2122 hzurcher@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 Material Handling Exchange, Incorporated on January 29, 2013. 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 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. 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 Publicly Owned Treatment Works (POTW) limitations.

2.0 GENERAL

2.1 Facility Description

The permittee cleans and powder coats metal parts. Manufacturing processes include multi-stage washing, rinsing, surface coating, and powder painting. The plant normally operates 8 hours/day, 5 days/week.

The waste flows from the powder coating operations are subject to the Categorical Pretreatment Standards for New Source Metal Finishing Operations [40 CFR 33.17]. The standards are concentration-based (mg/l).

2.2 Receiving Publicly Owned Treatment Works (POTW)

The permittee discharges to the City of Franklin Wastewater Treatment Plant, a 5.13 MGD activated sludge treatment facility with grit removal, flow equalization, two oxidation ditches, secondary clarification, ultraviolet light disinfection, post aeration, aerobic digestion, biosolids dewatering and biosolids recycling. The POTW also serves Casting Technology Company (INP000212), Caterpillar Reman Powertrain (INP000257), Atlas Copco Hurricane, LLC (INP000228), KYB Industries (INP000086), Mitsubishi Heavy Industries (INP000067), Electro-Spec Inc. (INP000606), and Premium Composite Technology North America (INP000295).

The POTW discharges to Youngs Creek ($Q_{7,10} = 0.8\text{CFS}$).

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:	400 to 750 (1)
Sanitary:	800

- (1) Process Wastestream #1 is wastewater from the powder coating and rinsing operations. This will be discharged to the POTW once per week.

2.4 Wastewater Pretreatment

No pretreatment exists at this facility, however in some cases, it will be necessary to adjust pH prior to discharge.

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 and 327 IAC 5-22. In order to operate a wastewater treatment plant the operator shall have qualifications as established in 327 IAC 5-22-7. Based on information supplied by the permittee, the facility is required to have a Class A-SO Operator, if pH adjustment occurs.

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 33.17] standards.

4.2 Selection of Concentration Limits

The permittee's discharge must comply with New Source Metal Finishing Operations [40 CFR 33.17] 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]. Outfall 001 is located in the Waste Pit following the powder coating operation, prior to combination with sanitary wastewater.

<u>Parameter [2]</u>	<u>Discharge Limitations</u>		<u>Unit</u>	<u>Monitoring Requirements</u>	
	<u>Daily Maximum[6]</u>	<u>Monthly Average[6]</u>		<u>Measurement Frequency[4]</u>	<u>Sample Type [3]</u>
Flow[5]	Report	Report	MGD	Daily	24-Hr. Total
Cadmium [Cd]	0.11	0.07	mg/l	1 X Month	24 Hr. Comp.
Total Chromium [Cr(T)]	2.77	1.71	mg/l	1 X Month	24 Hr. Comp.
Copper [Cu]	3.38	2.07	mg/l	1 X Month	24 Hr. Comp.
Lead [Pb]	0.69	0.43	mg/l	1 X Month	24 Hr. Comp.
Nickel [Ni]	3.98	2.38	mg/l	1 X Month	24 Hr. Comp.
Silver [Ag]	0.43	0.24	mg/l	1 X Month	24 Hr. Comp.
Zinc [Zn]	2.61	1.48	mg/l	1 X Month	24 Hr. Comp.
Total Cyanide [CN(T)][8]	1.20	0.65	mg/l	1 X Month	Grab
TTO[9]	2.13	-----	mg/l	2 X Year	Grab

<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	10.0	s.u.	Daily	Grab

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

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

[3] The daily composites must be flow-proportional samples consisting of aliquots withdrawn throughout the daily discharge period. The aliquots may be: (i) uniform aliquots withdrawn at uniform flow intervals; or (ii) flow-proportional aliquots withdrawn at uniform time intervals.

[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] The flow must be measured and recorded using valid flow measurement devices, not estimated. The flow monitoring device must be calibrated at least once annually.
- [6] Based on categorical standards [40 CFR 433.17]. The Standard is concentration-based (mg/l).
- [7] Based on local ordinance [Franklin Ordinance No. 98-7].
- [8] 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. Since the permittee does not use CN, the CN(T) samples should be collected at the end-of-process site.
- [9] The Total Toxic Organics (TTO) parameter is defined as the sum of the concentration values above .01 mg/l for the toxic organic compounds that constitute this parameter under the applicable categorical standard.

5.2 Permit Processing/Public Comment

Pursuant to IC 13-15-5-1, IDEM will publish a general notice in the newspaper with the largest general circulation within the above county. A 30-day comment period is available in order to solicit input from interested parties, including the general public. Comments concerning the draft permit should be submitted in accordance with the procedure outlined in the enclosed public notice form.

5.3 Post Public Notice Addendum: March 22, 2013

The draft IWP permit for Material Handling Exchange, Incorporated was made available for public comment from February 21, 2013 to March 21, 2013 as part of Public Notice No. 2013-2G-RD. During this comment period, a comment letter dated March 1, 2013, from Raymond Kassab of SES Environmental, was received. Those comments and this Office's corresponding responses are summarized below: Any changes to the permit and/or Briefing are so noted below.

- Comment 1: In Section 2.3 Discharge Description, Process Wastestream #1, the industrial flow is listed as 500 gallons per day. However, in the cover letter submitted with the Application prepared by SES, dated January 29, 2013, and in the Pretreatment Permit Briefing Memo prepared by SES that accompanied the application for the permit, it states that this discharge it states that the anticipated flow range is from 400 to 750 gallons per day, but it only occurs during one shift in a week. Thus, the anticipated total discharge is 400 to 750 gallons per week.
- Response 1: Section 2.3 has been updated to better reflect the permittee's discharge.
- Comment 2: Currently, the draft permit lists a measurement frequency requirement of two times per month. Additionally, the sample type requirement is a 24-hour composite for heavy metals. SES respectfully requests the sampling frequency be reduced to once per month and the sample type for heavy metals be changed to a grab sample rather than a 24-hour composite.
- Response 2: Due to the relatively low volume of discharge and results from the wastewater characterization submitted in the permit application, IDEM agrees that the sampling frequency can be reduced to one time per month. The request to change the sample type to grab for all parameters is denied. Based

on the fact that when the facility discharges, it will be a continuous discharge over several hours, IDEM believes a composite sample for the specified parameters is appropriate.

STATE OF INDIANA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

PUBLIC NOTICE NO: 2013 – 4B – F

DATE OF NOTICE: APRIL 5, 2013

The Office of Water Quality issues the following NPDES FINAL PERMIT.

PRETREATMENT – NEW

MATERIAL HANDLING EXCHANGE INC., Permit No. INP000627, JOHNSON COUNTY, 1001 Hurricane St, Franklin, IN. This industrial pretreatment facility will discharge 0.0013 million gallons daily of sanitary & process wastewater into the Franklin WWTP. Permit Manager: Holly Zurcher at 317/234-2122.
hzurcher@idem.in.gov.

APPEAL PROCEDURES FOR FINAL PERMITS

The Final Permits are available for review & copies at IDEM, Indiana Government Center, North Bldg, 100 N Senate Ave, Indianapolis, IN, Rm 1203, Office of Water Quality/NPDES Permit Section, from 9 – 4, M - F (copies 10¢ per page). Each Final Permit is available at the respective, local County Health Department. **Please tell others you think would be interested in this matter.** Regarding your rights and responsibilities pertaining to the Public Notice process and timeframes, please refer to IDEM websites: <http://www.in.gov/idem/5474.htm> and IDEM Permit Guide (Public Participation): <http://www.in.gov/idem/4172.htm>.
To view the Citizen Guide go to: <http://www.in.gov/idem/5803.htm>.

Appeal Procedure: Any person affected by the issuance of the Final Permit may appeal by filing a Petition for Administrative Review with the Office of Environmental Adjudication **within** eighteen (18) days of the date of this Public Notice. Any appeal request must be filed in accordance with IC 4-21.5-3-7 and must include facts demonstrating that the party requesting appeal is the applicant; a person aggrieved or adversely affected or is otherwise entitled to review by law.

Timely filing: The Petition for Administrative Review must be received by the Office of Environmental Adjudication (OEA) **within** 18 days of the date of this Public Notice; either by U.S. Mail postmark or by private carrier with dated receipt. This Petition for Administrative Review represents a request for an Adjudicatory Hearing, therefore must:

- state the name and address of the person making the request;
- identify the interest of the person making the request;
- identify any persons represented by the person making the request;
- state specifically the reasons for the request;
- state specifically the issues proposed for consideration at the hearing;
- identify the Final Permit Rule terms and conditions which, in the judgment of the person making the request, would be appropriate to satisfy the requirements of the law governing this NPDES Permit rule.

If the person filing the Petition for Administrative Review desires any part of the NPDES Final Permit Rule to be stayed pending the outcome of the appeal, a Petition for Stay must be included in the appeal request, identifying those parts to be stayed. Both Petitions shall be mailed or delivered to the address here:
Phone: 317/232-8591.

Environmental Law Judge
Office of Environmental Adjudication
IGC – North Building- Rm 501
100 N. Senate Avenue
Indianapolis IN 46204

Stay Time frame: If the Petition (s) is filed **within** eighteen (18) days of the mailing of this Public Notice, the effective date of any part of the permit, within the scope of the Petition for Stay is suspended for fifteen (15) days. The Permit will become effective again upon expiration of the fifteen (15) days, unless or until an Environmental Law Judge stays the permit action in whole or in part.

Hearing Notification: Pursuant to Indiana Code, when a written request is submitted, the OEA will provide the petitioner or any person wanting notification, with the Notice of pre-hearing conferences, preliminary hearings, hearing stays or orders disposing of the Petition for Administrative Review. Petition for Administrative Review must be filed in compliance with the procedures and time frames outlined above. Procedural or scheduling questions should be directed to the OEA at the phone listed above.

Zurcher, Holly

From: Ray Kassab [r.kassab@sesadvantage.com]
Sent: Wednesday, March 20, 2013 12:01 PM
To: Zurcher, Holly
Subject: RE: Discharge Rate Clarification, Sampling Frequency and Methodology Modification

Holly

They fabricate their product 3 to 4 days per week. They wash the produced parts and wash them once per week prior to painting. During that day they plan to discharge continuously at a flow rate of approximately 1 gallon per minute (a total of approximately 450 gallons during that day) to the sanitary sewer. Thus the total anticipated flow for a given month is projected to be less than 2,000 gallons. They are not storing the water in a tank prior to discharge. Thus, as designed, it can not be considered a batch.

When do you anticipate the permit will be finalized?

If you need any more clarification, please give me a call at 317.417.6807

Regards,

Ray Kassab
SES Environmental

From: Zurcher, Holly [mailto:hzurcher@idem.IN.gov]
Sent: Wednesday, March 20, 2013 11:28 AM
To: Ray Kassab
Subject: RE: Discharge Rate Clarification, Sampling Frequency and Methodology Modification

Ray,

The permit application indicates that this is a continuous discharge, but it is actually a batch, correct? That would help clarify that the discrepancy of the gallons per day vs gallons per week.

Holly Zurcher
IDEM, Office of Water Quality
100 N. Senate Avenue
MC 65-42, IGCN 1255
Indianapolis, IN 46204
(317)234-2122

From: Ray Kassab [mailto:r.kassab@sesadvantage.com]
Sent: Friday, March 01, 2013 4:40 PM
To: Zurcher, Holly
Cc: Kevin Lawrence; ralbright@m-h-e.com
Subject: Discharge Rate Clarification, Sampling Frequency and Methodology Modification

Hello Holly,

I prepared the attached letter based on our earlier discussion and the subsequent voicemail message I left you this afternoon.

The permit and public notice has the facility discharging 500 gpd while the projected industrial discharge is estimated at 400 to 750 gallons per WEEK. Thus we are requesting that the sample frequency be reduced to once per month, and that the sample type be changed to grab from composite.

Feel free to let me know if you have any questions. I will send a hard copy of this letter to you upon request.

Sincerely,

Ray Kassab
SES Environmental
Cell 317.417.6807



Raymond L. Kassab Jr. L.P.G., RIWP
Environmental Division Mgr - Indianapolis
6836 Hawthorn Park Drive
Indianapolis, IN 46220
Phone: 317/841-8280
Fax: 317/334-1998
r.kassab@sesadvantage.com

March 1, 2013

Indiana Department of Water Quality
Pretreatment Section -Permits
Ms. Holly Zurcher
100 N. Senate Avenue
Indianapolis, Indiana 46204-2251

**RE: Industrial Waste Stream Flow Rate Clarification
Sampling Modification Request
Material Handling Exchange, Incorporated
1001 Hurricane Street
Franklin, Indiana 46131
Draft IWP Permit No. INP000627**

Dear Ms. Zurcher:

SES has prepared this letter, on behalf of Material Handling and Exchange, Inc., to clarify the rate of industrial discharge from the facility and respectfully request that IDEM reevaluate the frequency of sampling and sample type.

In Section 2.3 Discharge Description, Process Wastestream #1, the industrial flow is listed as 500 gallons per day. However, in the cover letter submitted with the Application prepared by SES, dated January 29, 2013, and in the Pretreatment Permit Briefing Memo prepared by SES that accompanied the application for the permit, it states that this discharge it states that the anticipated flow range is from 400 to 750 gallons per day, but it only occurs during one shift in a week. Thus, the anticipated total discharge is 400 to 750 gallons per week. SES understands that the application states 500 gallons per day, but there was no way to indicate that this discharge is only to occur once per week.

The quotes from the cover letter and memo are cited as follows:

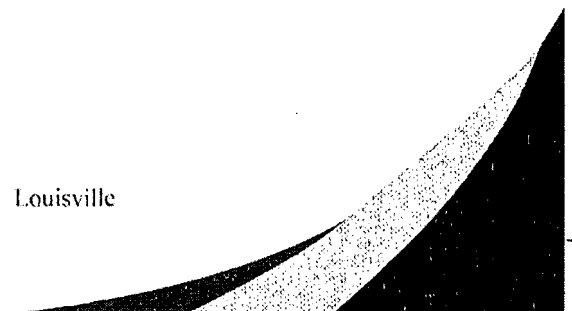
Paragraph 1 of the Application cover letter prepared by SES Dated January 29, 2013:

SES Environmental is submitting the attached Application for Industrial Wastewater Pretreatment Permit (State Form 50271) on behalf of Material Handling Exchange, Incorporated (MHE). The facility is currently receiving equipment and undergoing modifications to begin washing metal fabricated parts in preparation for powder coating. The facility anticipates discharging approximately 400 to 750 gallons once per work week into the Franklin Municipal sanitary sewer system.

Lansing Fort Wayne Indianapolis Louisville



in addition to...



The Facility Description section of the Pretreatment Permit Briefing Memo prepared by SES, which accompanied the permit Application:

Facility Description

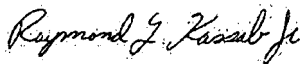
This facility is designed to clean and powder coat metal parts. This facility will be producing metal parts five days per week for eight hours per day. The parts will be washed and painted one day per week. The average production projection for the facility for the remainder of 2013 is 90,000 square feet of metal substrate surface area per week. The processes include a multistage washing, rinsing, and surface coating process, and powder (dry) painting. The regulated process is a conveyORIZED paint preparation system, consisting of wash/coat, and rinse stages. It is anticipated that this process will discharge 400 to 750 gallons per day during one eight hour shift per week.

The anticipated flow is actually 400 to 750 gallons per week as opposed to 500 gallons per day. Thus, instead of a discharge rate of 0.0013 MGD as stated in Public Notice No: 2013-2G-RD, it is actually 0.0008 MGD 4 days per week, and 0.0013 MGD one day per week.

Currently, the draft permit lists a measurement frequency requirement of two times per month. Additionally, the sample type requirement is a 24-hour composite for heavy metals. SES respectfully requests the sampling frequency be reduced to once per month and the sample type for heavy metals be changed to a grab sample rather than a 24-hour composite.

Thank you for taking the time to review this submittal and consider the request for sampling modification. Please contact me at (317) 417-6807 or at r.kassab@sesadvantage.com in the event your office has any questions, or is in need of any additional information for this submittal.

Sincerely,



Digitally signed by Raymond Kassab
DN: cn=Raymond Kassab, o=SES
Environmental, ou=Senior Project Manager,
email=r.kassab@sesadvantage.com, c=US
Date: 2013.03.01 16:32:40 -05'00'

Raymond L. Kassab Jr.
SES Environmental



Zurcher, Holly

From: Ray Kassab [r.kassab@sesadvantage.com]
Sent: Thursday, February 07, 2013 9:49 PM
To: Zurcher, Holly
Subject: RE: Permit application for Material Handling Exchange, Inc.
Attachments: MHE Powder Coat System 1-27-13 11X17.pdf

Holly,

1. Ryan's email address is ralbright@m-h-e.com

2. The "proposed sample location" is the "waste pit" as labeled in the snapshot of the drawing below. The dashed line that goes toward the top of the page represents the proposed process wastewater line. This proposed line will tie into the existing sanitary line coming from the rest rooms. The combined wastewater flow would then go to the right, outside the building, where it ties into the existing city sanitary line. I have attached an electronic copy of the figure so you can manipulate it to suit the views you need as continue your review.

Feel free to contact me with any additional questions.

Sincerely,

Ray Kassab
SES Environmental



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

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.

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/>

Type of IWP Permit

- ☒ New
☐ Renewal
☐ Modification

IWP PERMIT NUMBER

INP000627

PART A: APPLICANT ADDRESS AND CONTACT(S)

FACILITY/OPERATION

1. Facility name: Material Handling Exchange, Incorporated			
2. Mailing address: 1800 Churchman Avenue			
City: Indianapolis	County: Marion	State: IN	ZIP Code: 46203
3. Facility phone number: (317) 788-7225		4. Facility e-mail address (optional): Deebbie@m-h-e.com	
5. Address of operation: 1001 Hurricane Street			
City: Franklin	State: IN	ZIP Code: 46131	
6. Designated contact name (first, last): Ryan Albright			
7. Title: Manager		8. Mailing address: 1800 Churchman Avenue	
City: Indianapolis	State: IN	ZIP Code: 46203	
9. Phone number: (317) 788-7225		10. E-mail address (optional):	

DESIGNATED SIGNATORY AUTHORITY

NOTE: Signatory Authorization is defined in 327 IAC 5-16-5(b)

11. Designated signatory authority name (first, last): Kevin Lawrence		12. Title: President	
13. Address: 1800 Churchman Avenue			
City: Indianapolis	State: IN	ZIP Code: 46203	
14. Phone number: (317) 788-7225		15. E-mail address (optional):	

(Continued on page 2)

IDEM - AR
PAID

2013 JAN 29 P 3:26
IDEM - OEA
RECEIVABLES

RECEIVING POTW: Franklin, Indiana		
16. Contact Name Rick Littleton		17. Title: Superintendent
18. Address: 796 South State Street		
City: Franklin	State: IN	ZIP Code: 46131
19. Phone number: (888) 736-3640		20. E-mail address (optional):
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 type="checkbox"/> Sat. <input type="checkbox"/> Sun.		
22. Hours per day of operation: 8		
23. Number of shifts per day: 1		
24. Total number of employees per shift: 40		
DURATION OF OPERATION		
25. Date that facility began (or will begin) operation (mm/dd/yyyy): 02/01/2013		
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: Stage 1 of the washer is heated with a closed loop heat exchanger.		
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 checked="" type="checkbox"/> Yes* <input type="checkbox"/> No *If yes, a. How often? <u>Once Per Week</u> b. How much? <u>500 Gallons</u> c. Is this water pretreated? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

(Continued on page 3)

PART C: PROCESS DESCRIPTION

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

This facility is designed to clean and powder coat metal parts. This facility will be producing metal parts five days per week for eight hours per day. The parts will be washed and painted one day per week. The average production projection for the facility for the remainder of 2013 is 90,000 square feet of metal substrate surface area per week. The processes include a multistage washing, rinsing, and surface coating process, and powder (dry) painting. The regulated process is a conveyORIZED paint preparation system, consisting of wash/coat, and rinse stages. It is anticipated that this process will discharge 500 to 1,000 gallons per day during one eight hour shift per week.

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).

The facility manufactures and powder coats metal parts that are incorporated into a final product elsewhere. Once fabricated, the parts are washed and dried. The washing process utilizes an iron phosphate cleaning and coating solution to clean and prepare the metal substrate for painting. MHE has elected to utilize Chemetall CrysCoat 2707 FF as the cleaning and coating chemical in Stage 1 of the washing process. Gardobond H 7110 and H 7212 will be utilized to adjust the pH of Stage 1. Stages 2 and 3 of the washer are rinse stages that utilize city water. The washing process generates an estimated 1 to 2 gallons per minute of wastewater from Stage 2 that will be discharged to the sanitary sewer. Chemetall does not anticipate the need for wastewater treatment prior to discharge to the sanitary sewer system. However, in some cases, it is necessary to adjust pH prior to discharge. The washed/coated parts run through a dryoff oven, powder paint(dry) is applied to the parts, cured in a curing oven, and then are staged for transfer to final assembly.

(Continued on page 4)

PART C: PROCESS DESCRIPTION (CONTINUED)

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

- | | |
|--|--|
| 1) Chemetall CrysCoat 2707 FF | 2) Chemetall Gardobond Additive H 7110 |
| 3) Chemetall Gardobond Additive H 7212 | 4) |
| 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):

MHE anticipates that approximately 90,000 square feet of metal substrate per week will be washed and painted.

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>Franklin</u>	500
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: 0 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: 0 GPD

c. Evaporation: 10 GPD

d. Contained in product: 0 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	500	<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	800	<input type="checkbox"/> Actual Volume <input checked="" type="checkbox"/> Expected Volume	<input checked="" 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.

MHE plans to utilize an ISTECH 1700 series Multi-Jet meter to monitor wastewater flow to Outfall #001. Specifications are included in the Pretreatment Permit Briefing Memo.

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):

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.

It is not anticipated that pretreatment will be necessary for this process.

► 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.

Grab samples were obtained from Stages 1, 2, and 3 and submitted for laboratory analysis. Cadmium, chromium, lead, zinc, copper, nickel, and silver were analyzed by Inductively Coupled Plasma Mass Spectrometry. Cyanide was analyzed by EPA Method 335.4). Representative sampling data is attached.

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

(Continued on page 8)

³ If 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.	Sludge	110 gallons	Sanitary Waste Landfill
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."

Ryan Albright General Manager
Name/Title

9/29/2013
Date (mm/dd/yyyy)

Ryan Albright
Signature

(317) 789-7225
Phone # ((xxx) xxx-xxxx)

REQUIRED APPLICATION ATTACHMENTS



PART F: WASTEWATER DISCHARGES TO SANITARY OR COMBINED SEWERS

36. a. It is anticipated that approximately 400 to 750 gallons of wastewater will be discharged from Stage 2 of the washing system per day during one eight hour shift per week. This is a rinse stage that consists of city water.

36. g. It is anticipated that 800 gallons of sanitary wastewater will be generated by approximately 40 employees utilizing the rest room facilities on a daily basis 5 days per week.

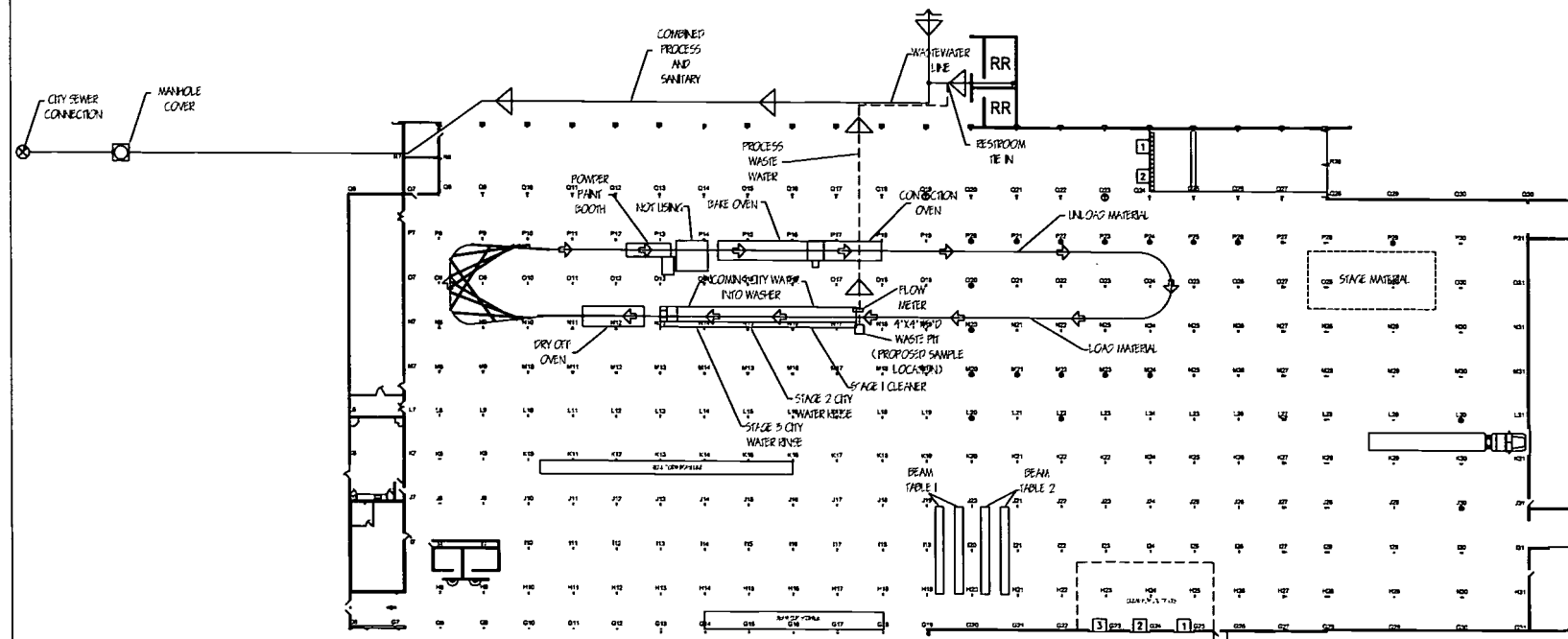


PART H: CHARACTERISTICS OF DISCHARGE

Figure HSP13A is attached which includes the required elements for the BUILDING LAYOUT

MHE PROCESS FLOW DIAGRAM is attached which includes the required elements for the SCHEMATIC FLOW DIAGRAM.





General Notes

No.	Revision/Issue	Date
6	REVISION 1	11/11/15
5	REVISION 2	11/11/15
4	REVISION 3	11/11/15
3	REVISION 4	11/11/15
2	REVISION 5	11/11/15
1	REVISION 6	11/11/15

CME DESIGN
6202 W BIG HURRICANE RD
MARTINSVILLE, IN 46151
754-225-9615

MHE
1800 CHURCHMAN AVE
INDIANAPOLIS, IN 46203

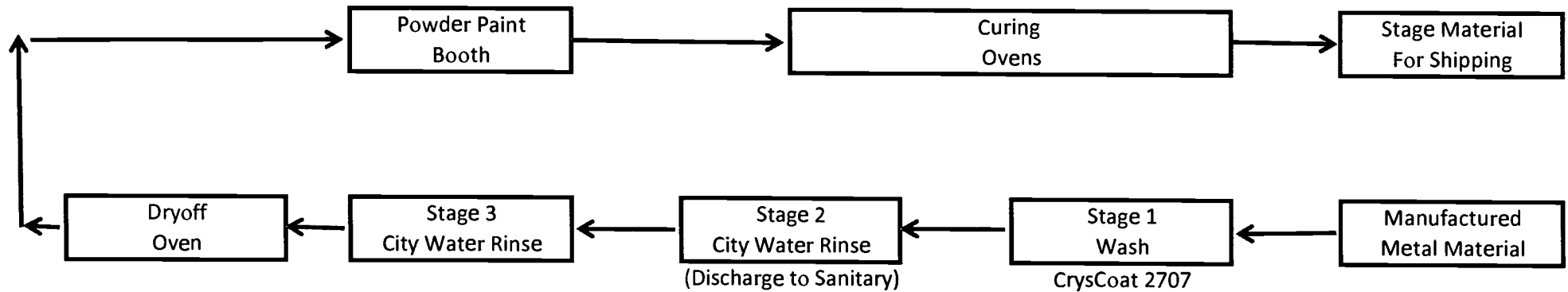
Project: HENRY ST. POWDER BOOTH
Date: 1-23-15
NOT TO SCALE
HSPBA

PART K:

49. Chemetall has provided analytical results for a representative water sample obtained from a washer system utilizing CrysCoat. Grab samples were obtained from Stages 1, 2, and 3 and submitted to Chemetall for laboratory analysis. Cadmium, chromium, lead, zinc, copper, nickel, and silver were analyzed by Inductively Coupled Plasma Mass Spectrometry. Cyanide was analyzed by EPA Method 335.4). Stage 2 is the stage that discharges to the sanitary. Thus the analytical results for that stage most closely represent concentrations anticipated to be discharge from Stage 2 of the MHE washer system.



MHE PROCESS FLOW DIAGRAM



Laboratory Report

Project # 143.811
Customer:
Location:
Customer ID: 84682

Date Completed: January 3, 2012
Date Received: December 8, 2011
TSS/TSM: G. Groubert
RSM: G. Schnabel

Sample Source and Description:

Samples from Stage 1, 2, and 3 of a Crysocoat 2707 process from a paint line were received.

Test Requested:

Elemental Analysis

Results:

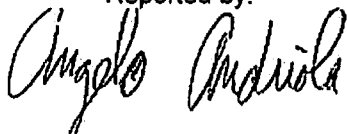
Stage 1, 2, and 3 Crysocoat 2707 Process Samples:

Test Conducted	Results		
	Stage 1	Stage 2	Stage 3
Cadmium (ICP)	0.03 ppm	<0.01 ppm	0.03 ppm
Chromium (ICP)	<0.01 ppm	<0.01 ppm	<0.01 ppm
Lead (ICP)	<0.01 ppm	<0.01 ppm	<0.01 ppm
Zinc (ICP)	0.07 ppm	<0.01 ppm	<0.01 ppm
Copper (ICP)	0.02 ppm	<0.01 ppm	<0.01 ppm
Nickel (ICP)	0.12 ppm	<0.01 ppm	0.02 ppm
Silver (ICP)	<0.01 ppm	<0.01 ppm	<0.01 ppm
Cyanide (EPA 335.4)	200 ppb	Not Detected	Not Detected

Disposal:

Samples used in testing.

Reported by:



Angelo Andriola
Associate Chemist

Reviewed by:



Payal Baxi
Team Leader, Analytical

Billing Information

Product code	Quantity	Price per Unit	P. O. # N/A
			Total Price
TECHSERVICE_NP	3		
ICP ANALYSIS	21		
		Subtotal	
		Total	N/C

CST: Lab Reports Storage

Advancing the Standard

675 Central Ave • New Providence • New Jersey • 07974

Tel: (800) 526-4473/ (908) 464-6900 • Fax: (908) 464-5354 • Web site: <http://www.chemetallamericas.com>
CF023 R5 03/22/11

PART N: ADMINISTRATIVE OPERATIONS AND PRECEDURES ACT

A completed copy of the Identification of Potentially Affected Persons Form #49456 is attached along with a completed mailing label for the City of Franklin POTW. Since the process is to discharge to the Franklin POTW, they are the only Potentially Affected Person subject to this facility.





IDENTIFICATION OF POTENTIALLY AFFECTED PARTIES

State Form 49456 (R / 2-09)

Approved by State Board of Accounts, 2009

IDEM

Office of Water Quality, Permits Section

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.

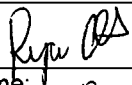
Example: 65-42PS
 John Doe
 111 Circle Drive
 City, State, Zip Code

I. Identification of Potentially Affected Persons

Please list here any and all persons whom you have reason to believe have a substantial or proprietary interest in this matter, or could otherwise be considered to be potentially affected under the law. Failure to notify any person who is later determined to be potentially affected could result in voiding our decision on procedural grounds. To ensure conformance with AOPA and to avoid reversal of a decision, please list all such parties. The letter attached to this form will further explain the requirements under the AOPA. Attach additional names and addresses on a separate sheet of paper, as needed. Please indicate below the type of action you are requesting.

Name: Franklin Publicly Owned Treatment Works		Name:	
Street address: 70 East Monroe Street, P.O. Box 280		Street address:	
City/State/ZIP code: Franklin, Indiana 46131		City/State/ZIP code:	
Name:		Name:	
Street address:		Street address:	
City/State/ZIP code:		City/State/ZIP code:	
Name:		Name:	
Street address:		Street address:	
City/State/ZIP code:		City/State/ZIP code:	
Name:		Name:	
Street address:		Street address:	
City/State/ZIP code:		City/State/ZIP code:	
Name:		Name:	
Street address:		Street address:	
City/State/ZIP code:		City/State/ZIP code:	
Name:		Name:	
Street address:		Street address:	
City/State/ZIP code:		City/State/ZIP code:	
Name:		Name:	
Street address:		Street address:	
City/State/ZIP code:		City/State/ZIP code:	
Name:		Name:	
Street address:		Street address:	
City/State/ZIP code:		City/State/ZIP code:	
Name:		Name:	
Street address:		Street address:	
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City/State/ZIP code:		City/State/ZIP code:	
Name:		Name:	
Street address:		Street address:	
City/State/ZIP code:		City/State/ZIP code:	
Name:		Name:	
Street address:		Street address:	
City/State/ZIP code:		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: <u>RYAN ALBRIGHT</u>		Date: <u>01-29-13</u>
Facility name: <u>Material Handling Exchange</u>		
Facility address: <u>1001 Hurricane Road</u>		
Facility city: <u>Franklin</u>	Facility state: <u>Indiana</u>	ZIP code: <u>46131</u>

III. Type of Action (check one)

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

A \$50.00 fee is required for a New permit, a Renewal or a Modification; if this is a renewal or modification request, include NPDES permit No. on check and return to:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Cashiers Office – Mail Code 50-10C
100 North Senate Avenue
Indianapolis, IN 46204-2251

If No Fee Is Required (Fee has previously been paid), Return To:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Water Quality – Mail Code 65-42
Room N1255
Permits Branch
100 North Senate Avenue
Indianapolis, Indiana 46204-2251



Raymond L. Kassab Jr. L.P.G., RIWP
Environmental Division Mgr - Indianapolis
6836 Hawthorn Park Drive
Indianapolis, IN 46220
Phone: 317/841-8280
Fax: 317/334-1998
r.kassab@sesadvantage.com

January 29, 2013

Indiana Department of Water Quality
Pretreatment Section –Permits
Cashiers Office – Mail Code 50-10C
100 N. Senate Avenue
Indianapolis, Indiana 46204-2251

**RE: New Industrial Pretreatment Permit
Material Handling Exchange, Incorporated
1001 Hurricane Street
Franklin, Indiana 46131**

Dear Pretreatment Section:

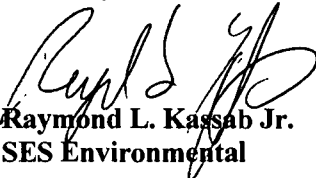
SES Environmental is submitting the attached Application for Industrial Wastewater Pretreatment Permit (State Form 50271) on behalf of Material Handling Exchange, Incorporated (MHE). The facility is currently receiving equipment and undergoing modifications to begin washing metal fabricated parts in preparation for powder coating. The facility anticipates discharging approximately 400 to 750 gallons once per work week into the Franklin Municipal sanitary sewer system.

SES contacted Mr. Rick Littleton, the Franklin Publicly Owned Treatment Works Superintendent, on January 8, 2013 to request permission to discharge to the treatment works. He informed SES that it would be necessary to submit an application to the IDEM Department of Water Quality for approval. Mr. Littleton provided MHE with a Letter of Intent to Provide Utility Service to MHE dated January 8, 2013 (Attached). As required, SES has completed and attached State Form 49456, Identification of Potentially Affected Parties, and included an addressed label to Mr. Rick Littleton of the Franklin POTW.

SES has prepared a Pretreatment Permit Briefing Memo that summarizes the manufacturing process, characterization of the wastewater, and waste disposal which is included with this submittal.

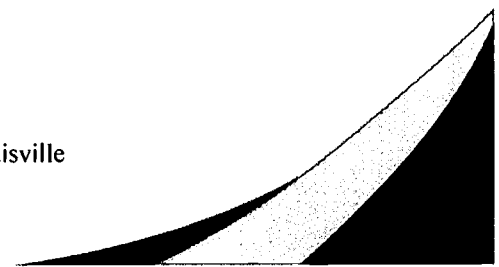
SES trusts this application meets the needs of the regulatory requirements for this facility. Please contact me at (317) 417-6807 or at r.kassab@sesadvantage.com in the event your office has any questions, or is in need of any additional information for this application.

Sincerely,


Raymond L. Kassab Jr.
SES Environmental

Lansing · Fort Wayne · Indianapolis · Louisville

www.SESadvantage.com



CITY OF FRANKLIN

Department of Public Works

January 8, 2013

Mr. Ryan Albright
Material Handling Exchange, Inc.
1001 Hurricane Road
Franklin, Indiana 46131

RE: Intent to provide utility service
Material Handling Exchange, Inc.
Franklin, Indiana
Johnson County

Dear Sir:

Please be advised that the City of Franklin has adequate capacity at it's wastewater treatment plant to provide service to this proposed project, subject to our standard specifications and applicable fees for connecting to the sanitary sewer system.

This shall not be construed as approval of plans for said project, but rather a statement that the capacity and facilities to provide service are available.

Sincerely,



Rick Littleton, Superintendent
City of Franklin DPW

PRETREATMENT PERMIT BRIEFING MEMO

Material Handling Exchange
1001 Hurricane Road
Franklin, IN 46131

Facility Description

This facility is designed to clean and powder coat metal parts. This facility will be producing metal parts five days per week for eight hours per day. The parts will be washed and painted one day per week. The average production projection for the facility for the remainder of 2013 is 90,000 square feet of metal substrate surface area per week. The processes include a multistage washing, rinsing, and surface coating process, and powder (dry) painting. The regulated process is a conveyORIZED paint preparation system, consisting of wash/coat, and rinse stages. It is anticipated that this process will discharge 400 to 750 gallons per day during one eight hour shift per week.

Wastewater

Wastewater generated from the paint pretreatment process will be discharged to a subsurface pit, then transferred to the sanitary sewer line that services the rest rooms inside the building.

A non-resettable in-pipe flow meter will be installed prior to the discharge point. Specifications are attached are included with this application.

Water samples will be obtained from the sample point and submitted for laboratory analysis of the priority pollutants specified by the Indiana Department of Environmental Management and the City of Franklin. The laboratory analytical results of the water sample will be compared to the regulatory discharge limits of the discharge permit to assure compliance with the regulatory limits is maintained. Analytical results, required field measurements, and discharge volumes will be submitted to the Indiana Department of Environmental Management and the City of Franklin on the schedule set forth in the industrial user permit.

Solids Disposal

The solids produced by this process will be recovered during routine cleaning, containerized and transported off site for disposal.

Powder Coating Pretreatment System

Stage 1 - 3,000 gallons, does not overflow: Clean and Coat – CrysCoat® 2707 FF, environmentally-friendly iron phosphate cleaner/coater: Concentration range 3 – 4% by volume. Gardobond Additive H 7110 is used to decrease the pH as needed, while Gardobond Additive H 7212 is used to increase the pH as needed. Representative sampling data and Technical Data Sheets and Material Safety Data Sheets are attached(See Attachments PART K: 49).

Stage 2 - 800 gallons, City Water Rinse, overflows to wastewater pit, then transferred by pump to



sanitary sewer. pH adjustment may be necessary prior to discharge. This will be assessed following the start of production. IDEM and the City of Franklin will be notified in the event pH adjustment is necessary.

Stage 3 - 900 Gallons, City Water Rinse, overflow to Stage 2.



FLOW METER SPECIFICATIONS



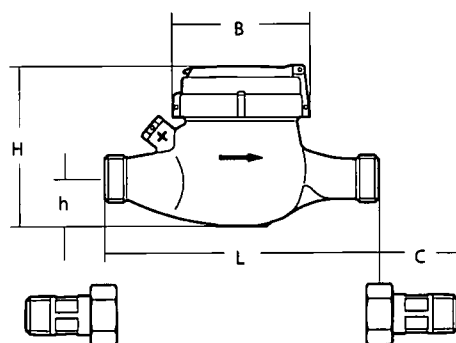
ISTEC's 1700 Series Multi-Jet Water Meter in 1" through 1-1/2"



- Multi-Jet Design with only the Impeller operating in the flow chamber for reliable performance
- No straight pipe required before or after the meter
- Dry Counter is not effected by dust and moisture
- Non-slip ferrite magnetic coupling
- Compact design for easy installation
- The compact design simplifies maintenance and repair by installing a complete flow chamber
- Calibration test certification available on request

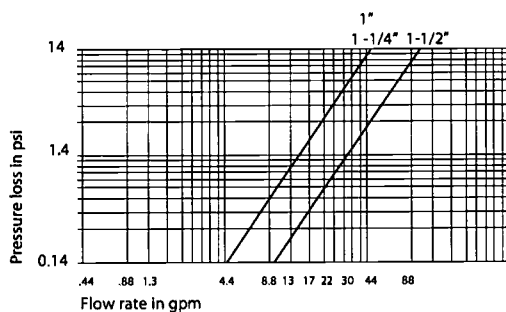
Model Number	1720	1730	1740
Pipe Size	1"	1-1/4"	1-1/2"
Minimum Flow Rate (GPM)	0.5	0.5	0.8
Continuous Flow Rate (GPM)	26.4	26.4	44
Maximum Flow Rate (GPM)	50	50	90
Maximum Operation Temperature (F)	200	200	200
Maximum Operation Pressure (PSI)	150	150	150
Design	Multi-Jet	Multi-Jet	Multi-Jet
Mounting Connections	NPT	NPT	NPT
Mounting Position	Horizontal		
Pulse (gal/pulse)	NO	NO	NO
Weight (pounds)	5.5	5.5	12

Dimensional Data

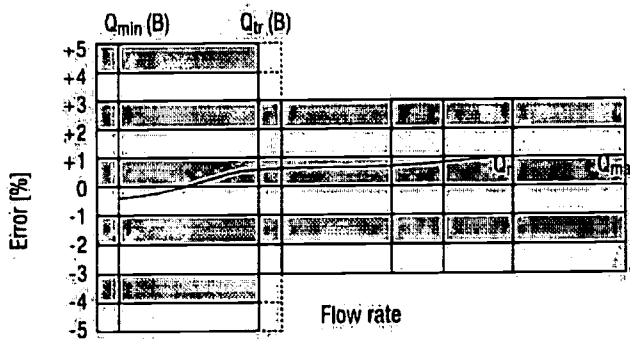


Model Number	1720	1730	1740
Pipe Size	1"	1-1/4"	1-1/2"
L (Body)	10-1/4"	10-1/4"	11-3/4"
C (NPT)	2-5/8"	2-7/8"	2-7/8"
B (Width)	3-5/8"	3-5/8"	4-3/4"
H (Height)	3-5/8"	3-5/8"	3-5/8"
h (Height)	1-7/8"	1-7/8"	1-7/8"

Head Loss



Accuracy Graph



TECHNICAL DATA SHEETS



CrysCoat® 2707 FF

Environmentally-Friendly, Molybdate-Free, Cleaner-Coater Iron Phosphate for Low Temperature Spray Processing of Ferrous Metals

PRIMARY APPLICATION

CrysCoat® 2707 FF is an environmentally-friendly, liquid, single-package, acidic product that cleans and produces an iron phosphate coating on iron and steel. While formulated primarily for ferrous substrates, CrysCoat 2707 FF can be used to clean aluminum, galvalume, galvanized, galvaneal and other zinc substrates prior to paint. CrysCoat 2707 FF has been specially formulated as an economical replacement for molybdate-accelerated iron phosphates which are experiencing more restrictive discharge limitations.

CrysCoat 2707 FF cuts processing costs by operating at energy-saving low temperatures. It has powerful cleaning ingredients that are low foaming, so no defoaming additive is needed. CrysCoat 2707 FF can also be applied using a steam or hot-high pressure wand.

Used under today's modern finishes, the coatings developed by CrysCoat 2707 FF provide corrosion resistance far superior to the old technology molybdate-based iron phosphates.

In some applications, it is used in combination with Gardobond Additive H 7110 or Gardobond Additive H 7212 to maintain precise operating pH.

CrysCoat 2707 FF meets the requirements of Federal Specification TT-C-490, Type II.

CHEMICAL CHARACTERISTICS

Chemical composition	acidic blend of phosphates, accelerators, biodegradable surfactants
Physical form	pale yellow liquid
Odor	mild
Specific gravity	1.133 at 68°F, (20°C)
Bulk density	9.44 lb/gal at 68°F, (20°C)
Flash point	none
Foam tendency	low
Biodegradable surfactants	yes
NPE-surfactant free	yes
pH, concentrate	about 3.1

APPLICATION PROCEDURE

CrysCoat 2707 FF is used in the first stage of a 3-stage spray washer or the third stage of a 5-stage spray washer and normally controlled as follows:

Concentration	3% - 4% by volume
Temperature	80°F - 120°F, (27°C - 49°C)
pH	4.5 - 5.5
Pressure	10 - 30 psi (0.7 - 2.0 bar)
Time	1 - 2 minutes

Chemetall

Note: Individual operations could require different operating parameters – concentration, temperature, pH, pressure, contact time – than recommended due to such variables as water quality or type of metal mix. For complete details, consult your Chemetall Technical Sales Representative.

SOLUTION CONTROL

Gardotest Procedure 154, Sample Size: 25 ml, Factor: 0.37

pH: After the concentration is checked and adjusted, check the pH. The normal operating range is 4.5 - 5.5. If the pH is too low, such as with a new bath, it can be raised with small additions of Gardobond Additive H 7212. If the pH is too high, it can be reduced with additions of CrysCoat 2707 FF, or in the case of hard or alkaline water, small additions of Gardobond Additive H 7110.

EQUIPMENT

The Chemetall Electrodeless Conductivity/Concentration Control System and Chemical Metering Pump can be used to monitor and automatically maintain the concentration of this product using conductivity. If controlling by pH is required, the Chemetall Iron Phosphate Control System and Chemical Metering Pump can be used to monitor and automatically maintain the pH and concentration of this product using pH control & timed feed principle. Please contact the Chemetall Process Equipment and Engineering Department for specific recommendations.

NOTES ON USE (see Material Safety Data Sheet)

For longest equipment life, stainless steel tanks and equipment is recommended, preferably types 304 or 316. Mild steel equipment can be used, but will provide shorter life due to the corrosive nature of acidic materials. Heating surfaces, pumps and valves should be constructed of stainless steel, preferably type 316L. Stainless fitted pumps with cast iron housings are acceptable. Suitable plastics may be used for tanks, equipment, piping and nozzles. As with any chemical, the materials described in this document must be used within the recommended operating ranges for these equipment recommendations to apply.

If there is a possibility that this product has been exposed to a temperature in excess of 90°F (32°C) it should be mixed prior to use.

Avoid contact with or mixing with chlorine-releasing materials and reducing agents.

SAFETY AND HANDLING

Prior to handling and use of any of the materials referenced in this document, the Material Safety Data Sheets should be read and understood by all personnel in contact with these materials.

KEEP OUT OF REACH OF CHILDREN

STORAGE

Dry indoor storage at temperatures between 40°F and 100°F (4.4°C and 37.8°C) is recommended, away from any incompatible materials referenced in the Material Safety Data Sheets. All containers should be tightly closed when not in use.

DISPOSAL

Any disposal of the materials referenced in this document should be in accordance with all applicable federal, state, providential and local regulations. The process solution can contain components other than those present in the materials as supplied. Analysis of process solutions may be required prior to disposal.

Chemetall US, Inc. ("Chemetall") warrants that this product or products described herein will conform with its published specifications. The products supplied by Chemetall and information related to them are intended for use by buyers having necessary industrial skill and knowledge. Buyers should undertake sufficient verification and testing to determine the suitability of the Chemetall materials for their own purpose. Since buyer's conditions of use of products are beyond Chemetall's control, Chemetall does not warrant any recommendations and information for the use of such products. CHEMETALL DISCLAIMS ALL OTHER WARRANTIES INCLUDING THE IMPLIED WARRANTY OF MERCHANTABILITY AND FITNESS FOR ANY PARTICULAR PURPOSE IN CONNECTION WITH THE USE OF ITS PRODUCTS.

Chemetall



ISO 9001/FM 93653

Corporate Headquarters and Eastern Branch (800) 526-4473 • Central Branch (Midwest) (877) 941-3800
Western Branch (800) 331-1197 • Chemetall Canada Limited (877) 311-1471
Chemetall Mexicana 011 52 442 227 2000
Website: www.chemetallamericas.com • E-mail: chemetall.americas@chemetall.com

F-17982 - 10/2010
Printed in the USA

MATERIAL SAFETY DATA SHEETS



CrysCoat® 2707FFVersion 1.2
Revision Date 07/18/2012

Print Date 01/16/2013

SECTION 1. PRODUCT AND COMPANY IDENTIFICATION

Product name : CrysCoat® 2707FF
MSDS Number : REL_11349

Company : Chemetall US, Inc.
675 Central Avenue
New Providence, NJ 07974

Telephone : +18005264473
Telefax : +19084644658
Emergency telephone no : CHEMTREC - 800-424-9300

SECTION 2. HAZARDOUS COMPONENTS INFORMATION

Component	CAS-No.	Weight percent
Sodium nitrate	7631-99-4	3.00 - 7.00
Trade Secret Registry	735517-5044P	1.00 - 5.00

Unidentified ingredients are considered not hazardous under Federal Hazard Communication Standard (29CFR 1910.1200).

SECTION 3. HAZARDS IDENTIFICATION**Emergency Overview**

Form : liquid
Colour : Pale Yellow
Odour : mild
Hazard Summary : Causes severe burns. Also harmful by inhalation and if swallowed.

Route(s) of Entry	Inhalation	Skin	Ingestion
	yes	yes	yes

Carcinogenicity:

NTP No substance in this product is listed by NTP as a carcinogen
IARC No substance in this product is listed by IARC as a carcinogen
OSHA No substance in this product is regulated by OSHA as a carcinogen

SECTION 4. FIRST AID MEASURES

Inhalation : Move to fresh air. If symptoms persist, call a physician. If breathing is irregular or stopped, administer artificial respiration.

CrysCoat® 2707FFVersion 1.2
Revision Date 07/18/2012

Print Date 01/16/2013

- Skin contact : Wash off immediately with plenty of water for at least 15 minutes. Take off contaminated clothing and shoes immediately. Call a physician if irritation develops or persists.
- Eye contact : Rinse immediately with plenty of water for at least 15 minutes. Keep eye wide open while rinsing. Get medical attention immediately
- Ingestion : Rinse mouth. Drink 1 or 2 glasses of water. Never give anything by mouth to an unconscious person. Get medical attention immediately

SECTION 5. FIRE-FIGHTING MEASURES

- Flash point : Note: does not flash
- Lower explosion limit : Note: Not applicable.
- Upper explosion limit : Note: Not applicable.
- Autoignition temperature : No information available.
- TDG Flammability Class : NONE
- Suitable extinguishing media : Water spray
Foam
Carbon dioxide (CO₂)
Dry chemical
- Special protective equipment for fire-fighters : In the event of fire, wear self-contained breathing apparatus.
- Further information : Use water spray to cool unopened containers.

SECTION 6. ACCIDENTAL RELEASE MEASURES

- Personal precautions : Ensure adequate ventilation.
- Methods for cleaning up : Ventilate area.
Neutralize with lime milk or soda and flush with plenty of water.
Clean up with inert absorbant material.
Keep in suitable, closed containers for disposal.
Flush with plenty of water.
- Additional advice : Never return spills in original containers for re-use.

CrysCoat® 2707FF

Version 1.2
Revision Date 07/18/2012

Print Date 01/16/2013

SECTION 7. HANDLING AND STORAGE**Handling**

Handling : Use only with adequate ventilation.
Add this product to surface of solution slowly to avoid spattering
Do not add large amounts of product to solution at any one time.
Mix prior to use if exposed to temperatures above 90 F

Storage

Requirements for storage areas and containers : Store indoors in a cool, well-ventilated place
Keep container closed to prevent drying out.
Keep container out of sun and away from heat.
Keep containers dry and tightly closed to avoid moisture absorption and contamination.

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Component	ACGIH TLV (TWA)	OSHA PEL (TWA)
Sodium nitrate	NONE	NONE
Trade Secret Registry	NONE	NONE

Eye protection : Chemical resistant goggles must be worn.
Face-shield

Hand protection : Impervious gloves

Skin and body protection : Rubber or plastic apron

Respiratory protection : If the occupational exposure limits cannot be met, suitable respirator equipment shall be worn.

Hygiene measures : Avoid contact with skin, eyes and clothing.
Wear suitable gloves and eye/face protection.
Wear suitable protective clothing.
Wash hands before breaks and immediately after handling the product.
Provide adequate ventilation.
Do not inhale fumes.
Keep away from food and drink.

CrysCoat® 2707FFVersion 1.2
Revision Date 07/18/2012

Print Date 01/16/2013

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

pH	: 2.5 - 3.5
Freezing point	: < -1 °C (< 30 °F)
Boiling point/boiling range	: Note: no data available
Vapour pressure	: Note: no data available
Bulk density	: 9.46 lb/gal
Water solubility	: Note: completely soluble
Partition coefficient: n-octanol/water	: Note: no data available
Relative density	: 1.134
Evaporation rate	: Note: (Water =1) Less than 1

SECTION 10. STABILITY AND REACTIVITY

Conditions to avoid	: Avoid letting the product become dry. Direct sources of heat.
Materials to avoid	: Bases Organic materials Reducing agents Combustible material
Hazardous decomposition products	: Oxides of phosphorus Sulphur oxides nitrogen oxides (NO _x) Carbon oxides

SECTION 11. TOXICOLOGICAL INFORMATION

Toxicity:	: Mixture; Not Determined.
Acute oral toxicity Sodium nitrate	: LD50, rat Dose: 2,680 mg/kg

CrysCoat® 2707FFVersion 1.2
Revision Date 07/18/2012

Print Date 01/16/2013

SECTION 12. ECOLOGICAL INFORMATION

No data available

SECTION 13. DISPOSAL CONSIDERATIONS

Advice on Disposal : Refer to all federal, provincial, state and local regulation prior to disposition of container and unused contents by reuse, recycle or disposal.

SECTION 14. TRANSPORT INFORMATION

Refer to Bill of Lading.

SECTION 15. REGULATORY INFORMATION

TSCA Status	: All components of this material comply with US TSCA requirements.		
SARA 313 Components	: Sodium nitrate	CAS-No.	7631-99-4
CERCLA Reportable Quantity	: NONE		
California Prop. 65	: N.D		
NFPA	: 3 0 0 Corrosive Acid		
HMIS	: 3 0 0 J		

SECTION 16. OTHER INFORMATION**Further information**

Chemetall US, Inc. warrants that the products described herein will conform with its published specifications. The products supplied by Chemetall and information related to them are intended for use by buyers having necessary industrial skill and knowledge. Buyers should undertake sufficient verification and testing to determine the suitability of the Chemetall materials for their own particular purpose. Since buyer's conditions of use of products are beyond Chemetall's control, Chemetall does not warrant any recommendations and information for the use of such products. CHEMETALL DISCLAIMS ALL OTHER WARRANTIES INCLUDING THE IMPLIED WARRANTY OF MERCHANTABILITY AND FITNESS FOR ANY PARTICULAR PURPOSE IN CONNECTION WITH THE USE OF ITS PRODUCTS.

Gardobond Additive H 7110

Phosphoric acid additive

PRIMARY APPLICATION

Gardobond Additive H 7110 is a highly-concentrated liquid phosphoric acid additive.

CHEMICAL CHARACTERISTICS

chemical composition.....	phosphoric acid
physical form	liquid
color.....	colorless
odor	acid
bulk density	13 lb/gal
phosphorous-free	no
NPE surfactant-free.....	no surfactants
biodegradable surfactants.....	no surfactants
foam tendency.....	none
pH.....	<1

EQUIPMENT

Please contact the Chemetall Process Equipment and Engineering Department for specific recommendations.

SAFETY AND HANDLING

Prior to handling and use of any of the materials referenced in this document, the Material Safety Data Sheets should be read and understood by all personnel in contact with these materials.

KEEP OUT OF REACH OF CHILDREN

STORAGE

Dry indoor storage at temperatures between 40°F and 100°F (4.4°C and 37.8°C) is recommended, away from any incompatible materials referenced in the Material Safety Data Sheets. All containers should be tightly closed when not in use.

DISPOSAL

Any disposal of the materials referenced in this document should be in accordance with all applicable federal, state, providential and local regulations. The process solution can contain components other than those present in the materials as supplied. Analysis of process solutions may be required prior to disposal.

Chemetall

Chemetal US, Inc. ("Chemetal") warrants that this product or products described herein will conform with its published specifications. The products supplied by Chemetal and information related to them are intended for use by buyers having necessary industrial skill and knowledge. Buyers should undertake sufficient verification and testing to determine the suitability of the Chemetal materials for their own purpose. Since buyer's conditions of use of products are beyond Chemetal's control, Chemetal does not warrant any recommendations and information for the use of such products. CHEMETAL DISCLAIMS ALL OTHER WARRANTIES INCLUDING THE IMPLIED WARRANTY OF MERCHANTABILITY AND FITNESS FOR ANY PARTICULAR PURPOSE IN CONNECTION WITH THE USE OF ITS PRODUCTS.

Chemetal



ISO 9001/FM 93653

Corporate Headquarters and Eastern Branch (800) 526-4473 • Central Branch (Midwest) (877) 941-3800
Western Branch (800) 331-1197 • Chemetal Canada Limited (877) 311-1471
Chemetal Mexicana 011 52 442 227 2000
Website: www.chemetallamericas.com • E-mail: chemetall.americas@chemetall.com

F17379 04/2010
Printed in the USA

Gardobond® Additive H 7110

Version 1.5
Revision Date 07/08/2011

Print Date 01/16/2013

SECTION 1. PRODUCT AND COMPANY IDENTIFICATION

Product name : Gardobond® Additive H 7110
MSDS Number : REL_200819

Company : Chemetall US, Inc.
675 Central Avenue
New Providence, NJ 07974

Telephone : +18005264473
Telefax : +19084644658
Emergency telephone no : CHEMTREC - 800-424-9300

SECTION 2. HAZARDOUS COMPONENTS INFORMATION

Component	CAS-No.	Weight percent
Phosphoric acid	7664-38-2	70.00 - 80.00

Unidentified ingredients are considered not hazardous under Federal Hazard Communication Standard (29CFR 1910.1200).

SECTION 3. HAZARDS IDENTIFICATION**Emergency Overview**

Form : liquid
Colour : colourless
Odour : acrid
Hazard Summary : Harmful by inhalation and if swallowed. Causes severe burns.

Route(s) of Entry	Inhalation	Skin	Ingestion
	yes	yes	yes

Carcinogenicity:

NTP No substance in this product is listed by NTP as a carcinogen
IARC No substance in this product is listed by IARC as a carcinogen
OSHA No substance in this product is regulated by OSHA as a carcinogen

SECTION 4. FIRST AID MEASURES

Inhalation : Remove to fresh air. If symptoms persist, call a physician. If breathing is irregular or stopped, administer artificial respiration.

Skin contact : Wash off immediately with plenty of water for at least 15 minutes. Take off contaminated clothing and shoes

Gardobond® Additive H 7110Version 1.5
Revision Date 07/08/2011

Print Date 01/16/2013

- immediately. Get medical attention immediately if irritation develops and persists
- Eye contact : Rinse immediately with plenty of water for at least 15 minutes. Keep eye wide open while rinsing. Get medical attention immediately
- Ingestion : Rinse mouth. Drink 1 or 2 glasses of water. Never give anything by mouth to an unconscious person. Get medical attention immediately

SECTION 5. FIRE-FIGHTING MEASURES

- Flash point : Note: does not flash
- Lower explosion limit : Note: Not applicable.
- Upper explosion limit : Note: Not applicable.
- TDG Flammability Class : NONE
- Suitable extinguishing media : Dry chemical
Carbon dioxide (CO2)
Foam
Water spray
- Special protective equipment for fire-fighters : In the event of fire, wear self-contained breathing apparatus.
- Further information : Use water spray to cool unopened containers.

SECTION 6. ACCIDENTAL RELEASE MEASURES

- Personal precautions : Ensure adequate ventilation.
- Methods for cleaning up : Ventilate area.
Neutralize with lime milk or soda and flush with plenty of water.
Clean up with inert absorbant material.
Keep in suitable, closed containers for disposal.
Flush with plenty of water.
- Additional advice : Never return spills in original containers for re-use.

SECTION 7. HANDLING AND STORAGE**Handling**

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Handling : Add this product to surface of solution slowly to avoid spattering
Do not add large amounts of product to solution at any one time.
Use only with adequate ventilation.

Storage

Requirements for storage areas and containers : Keep containers dry and tightly closed to avoid moisture absorption and contamination.
Store indoors in a cool, well-ventilated place

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Component	ACGIH TLV (TWA)	OSHA PEL (TWA)
Phosphoric acid	1 mg/m ³	1 mg/m ³

Eye protection : Chemical resistant goggles must be worn.
Face-shield

Hand protection : Nitrile rubber
Neoprene gloves

Skin and body protection : Rubber or plastic apron

Respiratory protection : If the occupational exposure limits cannot be met, suitable respirator equipment shall be worn.

Hygiene measures : Avoid contact with skin, eyes and clothing.
Wear suitable gloves and eye/face protection.
Wear suitable protective clothing.
Wash hands before breaks and immediately after handling the product.
Provide adequate ventilation.
Do not inhale fumes.
Keep away from food and drink.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

pH : < 2.5

Freezing point : -3 °C (27 °F)

Boiling point/boiling range : Note: no data available

Vapour pressure : Note: no data available

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Bulk density : 13.1 lb/gal

Water solubility : Note: completely soluble

Partition coefficient: n-octanol/water : Note: no data available

Percent of Volatile by Weight excluding water : Note: no data available

Relative density : 1.570

Evaporation rate : 1
Note: Water = 1

SECTION 10. STABILITY AND REACTIVITY

Materials to avoid : Bases
Warning! Do not use together with other products, which may release dangerous gases (chlorine).

Hazardous decomposition products : Oxides of phosphorus
Hydrogen, by reaction with metals

SECTION 11. TOXICOLOGICAL INFORMATION

Toxicity : Mixture; Not Determined.

Acute oral toxicity
Phosphoric acid : LD50, rat
Dose: 1,530 mg/kg

SECTION 12. ECOLOGICAL INFORMATION

No data available

SECTION 13. DISPOSAL CONSIDERATIONS

Advice on Disposal : Refer to all federal, provincial, state and local regulation prior to disposition of container and unused contents by reuse, recycle or disposal.

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SECTION 14. TRANSPORT INFORMATION

Refer to Bill of Lading.

SECTION 15. REGULATORY INFORMATION

TSCA Status	:	All components of this material comply with US TSCA requirements.	
SARA 313 Components	:	NONE	
CERCLA Reportable Quantity	:	Phosphoric acid	5,000 Pounds
California Prop. 65	:	N.D	
NFPA	:	3 0 0 Corrosive Acid	
HMIS	:	3 0 0 J	
WHMIS	:	E: Corrosive Material D2B: Toxic Material Causing Other Toxic Effects	

SECTION 16. OTHER INFORMATION**Further information**

Chemetall US, Inc. warrants that the products described herein will conform with its published specifications. The products supplied by Chemetall and information related to them are intended for use by buyers having necessary industrial skill and knowledge. Buyers should undertake sufficient verification and testing to determine the suitability of the Chemetall materials for their own particular purpose. Since buyer's conditions of use of products are beyond Chemetall's control, Chemetall does not warrant any recommendations and information for the use of such products. CHEMETALL DISCLAIMS ALL OTHER WARRANTIES INCLUDING THE IMPLIED WARRANTY OF MERCHANTABILITY AND FITNESS FOR ANY PARTICULAR PURPOSE IN CONNECTION WITH THE USE OF ITS PRODUCTS.

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SECTION 1. PRODUCT AND COMPANY IDENTIFICATION

Product name : Gardobond® Additive H 7212
MSDS Number : REL_10634

Company : Chemetall US, Inc.
675 Central Avenue
New Providence, NJ 07974

Telephone : +18005264473
Telefax : +19084644658
Emergency telephone no : CHEMTREC - 800-424-9300

SECTION 2. HAZARDOUS COMPONENTS INFORMATION

Component	CAS-No.	Weight percent
Sodium hydroxide	1310-73-2	40.00 - 50.00

Unidentified ingredients are considered not hazardous under Federal Hazard Communication Standard (29CFR 1910.1200).

SECTION 3. HAZARDS IDENTIFICATION**Emergency Overview**

Form : liquid
Colour : colourless
Odour : none
Hazard Summary : Harmful by inhalation and if swallowed. Causes severe burns.

Route(s) of Entry	Inhalation	Skin	Ingestion
	yes	yes	yes

Carcinogenicity:

NTP No substance in this product is listed by NTP as a carcinogen
IARC No substance in this product is listed by IARC as a carcinogen
OSHA No substance in this product is regulated by OSHA as a carcinogen

SECTION 4. FIRST AID MEASURES

Inhalation : Move to fresh air. If symptoms persist, call a physician. If breathing is irregular or stopped, administer artificial respiration.

Skin contact : Wash off immediately with plenty of water for at least 15 minutes. Take off contaminated clothing and shoes

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- immediately. Get medical attention if irritation develops and persists
- Eye contact : Rinse immediately with plenty of water for at least 15 minutes. Keep eye wide open while rinsing. Get medical attention immediately
- Ingestion : Rinse mouth. Drink 1 or 2 glasses of water. Never give anything by mouth to an unconscious person. Get medical attention immediately

SECTION 5. FIRE-FIGHTING MEASURES

- Flash point : Note: does not flash
- Lower explosion limit : Note: Not applicable.
- Upper explosion limit : Note: Not applicable.
- TDG Flammability Class : NONE
- Suitable extinguishing media : Carbon dioxide (CO2)
Dry chemical
Foam
Water spray
- Special protective equipment for fire-fighters : In the event of fire, wear self-contained breathing apparatus.
- Further information : Use water spray to cool unopened containers.

SECTION 6. ACCIDENTAL RELEASE MEASURES

- Personal precautions : Ensure adequate ventilation.
Material can create slippery conditions.
- Methods for cleaning up : Ventilate area.
Neutralize with lime milk or soda and flush with plenty of water.
Clean up with inert absorbant material.
Keep in suitable, closed containers for disposal.
Flush with plenty of water.
- Additional advice : Never return spills in original containers for re-use.

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SECTION 7. HANDLING AND STORAGE**Handling**

Handling : Add this product to surface of solution slowly to avoid spattering
Do not add large amounts of product to solution at any one time.
Do not add to hot water warmer than 43 degrees to 49 degrees C (110 degrees to 120 degrees F).
Never add liquids to product

Storage

Requirements for storage areas and containers : Keep containers dry and tightly closed to avoid moisture absorption and contamination.
Store indoors in a cool, well-ventilated place

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Component	ACGIH TLV (TWA)	OSHA PEL (TWA)
Sodium hydroxide	2 mg/m3 ceiling	2 mg/m3 total particulate

Eye protection : Chemical resistant goggles must be worn.
Face-shield

Hand protection : Nitrile rubber
Neoprene gloves

Skin and body protection : Rubber or plastic apron

Respiratory protection : If the occupational exposure limits cannot be met, suitable respirator equipment shall be worn.

Hygiene measures : Avoid contact with skin, eyes and clothing.
Wear suitable gloves and eye/face protection.
Wear suitable protective clothing.
Wash hands before breaks and immediately after handling the product.
Provide adequate ventilation.
Do not inhale fumes.
Keep away from food and drink.

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SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

pH	: > 12.5
Freezing point	: 4.5 °C (40.1 °F)
Boiling point/boiling range	: Note: no data available
Vapour pressure	: Note: no data available
Bulk density	: 12.37 lb/gal
Water solubility	: Note: completely soluble
Partition coefficient: n-octanol/water	: Note: no data available
Percent of Volatile by Weight excluding water	: Note: no data available
Relative density	: 1.485
Evaporation rate	: 1 Note: Water = 1

SECTION 10. STABILITY AND REACTIVITY

Conditions to avoid	: freezing
Materials to avoid	: Acids
Hazardous decomposition products	: Hydrogen, by reaction with metals

SECTION 11. TOXICOLOGICAL INFORMATION

Toxicity: : Mixture; Not Determined.

Acute oral toxicitySodium hydroxide : LD₅₀, rabbit
Dose: 500 mg/kg**Acute toxicity (other routes of administration)**Sodium hydroxide : LD₅₀, dog, Intravenous
Dose: 45 mg/kg

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SECTION 12. ECOLOGICAL INFORMATION

No data available

SECTION 13. DISPOSAL CONSIDERATIONS

Advice on Disposal : Refer to all federal, provincial, state and local regulation prior to disposition of container and unused contents by reuse, recycle or disposal.

SECTION 14. TRANSPORT INFORMATION

Refer to Bill of Lading.

SECTION 15. REGULATORY INFORMATION

TSCA Status	:	All components of this material comply with US TSCA requirements.
SARA 313 Components	:	NONE
CERCLA Reportable Quantity	:	Sodium hydroxide 1,000 Pounds
California Prop. 65	:	N.D
NFPA	:	3 0 1 Corrosive Alkaline
HMIS	:	3 0 1 J
WHMIS	:	E: Corrosive Material

SECTION 16. OTHER INFORMATION**Further information**

Chemetall US, Inc. warrants that the products described herein will conform with its published specifications. The products supplied by Chemetall and information related to them are intended for use by buyers having necessary industrial skill and knowledge. Buyers should undertake sufficient verification and testing to determine the suitability of the Chemetall materials for their own particular purpose. Since buyer's conditions of use of products are beyond Chemetall's control, Chemetall does not warrant any recommendations and information for the use of such products. CHEMETALL DISCLAIMS ALL OTHER WARRANTIES INCLUDING THE IMPLIED WARRANTY OF MERCHANTABILITY AND FITNESS FOR ANY PARTICULAR PURPOSE IN CONNECTION WITH THE USE OF ITS PRODUCTS.