



## MATERIAL HANDLING EXCHANGE

1800 Churchman Ave. - Indianapolis, IN 46203 - (317) 788-7225 - (317) 788-7670 Fax

January 16, 2015

Ms. Bridget S. Murphy  
Inspections Section Chief  
Indiana Department of Environmental Management  
Compliance Branch: Office of Water Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

**RE: Response to Concerns**  
**Material Handling Exchange, Inc.**  
**IWP Permit No. INP000627**

Dear Ms. Murphy,

In accordance with your letter dated December 31, 2014, Material Handling Exchange has prepared this letter in response to two items of concern observed during an inspection of our facility on December 11, 2014. The items and responses follow.

**Item 1:** *The Self Monitoring Program was rated as unsatisfactory for not monitoring final effluent at the frequency required by the permit. This is a violation of Part I. A. 1 of the permit which sets forth the effluent monitoring frequencies applicable to the discharge from Outfall 001. The facility did not sample for Cyanide, Nickel, Silver, Zinc, Cadmium, Lead, Chromium and Copper for the month of December 2013.*

### **Material Handling Exchange Response:**

The individual tasked with the regulatory sampling, left without notice to the company, without passing the task on to another individual. Material Handling Exchange has implemented the following to ensure this task is not overlooked again:

A minimum of two managers on site are responsible for compliance with the regulatory sampling requirements;

At least one of those managers will be on site and will ensure pH measurements are performed during each discharge event and the regulatory sampling is performed during at least one discharge event during the sampling period;

The manager in charge of the discharge event orders sampling containers from the laboratory once a discharge event has been scheduled;

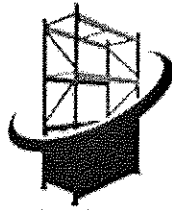
A lock has been installed on the wastewater discharge pump controls;

The key to the controls is maintained by the manager in charge of the discharge event;

The controls are unlocked by the manager in charge when the discharge event is to begin, and the controls are secured with a lock when the discharge event is complete;

The lock has a log sheet that the managers have to note the time the lock was taken off and the time the lock was reinstalled on the control.

*INP000627  
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The manager in charge is responsible for all record keeping, and is responsible for arranging for transport and submittal of the discharge samples for laboratory analysis.

*Item 2: The Records/Reports evaluation generated a marginal rating. A records review showed Chromium, Copper and Flow data was left off of the September 2014 DMR. This data needs to be entered on the DMR and the DMR must be resubmitted to IDEM.*

## **Material Handling Exchange Response:**

The data was included and submitted on the previous page (Page 2 of 3). The total toxic organics (TTO) analysis was performed in addition to the metals and Cyanide parameters. Only the December DMR includes a reporting line for TTO. The page was modified to reflect the proper reporting period and added to the report to ensure that all reporting requirements are met. The data has been added to this form and will be resubmitted to IDEM with the December discharge report. Additionally, Material Handling Exchange will report the September TTO data again in the December discharge report.

Material Handling Exchange trusts that the above responses adequately address the IDEM items of concern. If you should have any questions regarding the information included in this letter, or are in need of additional information, please feel free to contact me at 317-788-7225 or via email at [jrichards@m-h-e.com](mailto:jrichards@m-h-e.com).

Sincerely,

Josh Richards  
Material Handling Exchange

Cc: Rick Littleton, City of Franklin POTW  
Raymond Kassab, SES Environmental