INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

VIA ELECTRONIC MAIL February 28, 2017

Mr. Gary Sells, Operations Manager
Material Handling Exchange, Incorporated
1800 Churchman Avenue
Indianapolis, IN 46203

Dear Mr. Sells:

Re: Final Revoke\Reissue: Permit No. INP000627
Material Handling Exchange, Inc.
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. You are required to submit both federal discharge monitoring reports (DMRs) and state Monthly Monitoring Reports (MMRs) on a routine basis. The MMR form can be found on IDEM's web site at http://www.in.gov/idem/cleanwater/2396.htm.

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

All NPDES permit holders are required to submit their monitoring data to IDEM using NetDMR. Please contact Rose McDaniel at (317) 233-2653 or Helen Demmings at (317) 232-8815 if you would like more information on NetDMR. Information is also available on our website at http://IN.gov/idem/cleanwater/2422.htm.

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.

The draft IWP permit for the Facility was made available for public comment from January 12, 2017 through February 20, 2017 as part of Public Notice No. 2017-1C-RD. During this comment period, no comment letters were received.

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

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

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

If you have any questions concerning the permit, please contact Nicole Gardner at 317/232-8707 or by email at ngardner@idem.in.gov. Questions concerning appeal procedures should be directed to the Office of Environmental Adjudication, at 317/232-8591.

Sincerely,

Paul Novak, Chief
Permits Branch
Office of Water Quality

Enclosures

cc: Raymond Kassab, SES Environmental
Johnson County Health Department
Franklin POTW
Leigh Voss, Municipal Permits Section Chief

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: March 1, 2017

EXPIRATION DATE: February 28, 2022

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

Issued February 28, 2017, for the Indiana Department of Environmental Management.

Paul Novak

Paul Novak, Chief
Permits Branch
Office of Water Quality

PART I

(A) EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

(1) During the period beginning on the effective date of this permit, the permittee is authorized to discharge from Outfall 001[1][2]. Such discharge shall be limited and monitored by the permittee as specified below:

Table 1

	Discharge Limitations			Monitoring Requirements	
Parameter [2]	Daily Maximum[6]	Monthly Average[6]	Unit	Measurement Frequency[4]	Sample Type[3]
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	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[8]	1.20	0.65	mg/l	1 X Month	Grab
TTO[9]	2.13	------	mg/l	2 X Year	Grab

Table 2

	Quality or Concentration			Monitoring Requirements	
Parameter	Daily Minimum	Daily Maximum	Units	Measurement Frequency	Sample Type
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; (ii) flow-proportional aliquots withdrawn at uniform time intervals; or (iii) for batch discharge, uniform aliquots withdrawn from uniform batch volumes.

Alternatively, a 24-hour composite sample may be obtained by an automatic sampler on an equal time interval basis over a twenty-four hour period provided

that a minimum of 24 samples are taken and combined prior to analysis. The samples do not need to be flow-proportioned if the permittee collects samples in this manner.

[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") 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, in the case of a pollutant limited in terms other than mass pursuant to 327 IAC 5-2-11(e), the average concentration or other measurement of the pollutant specified (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 flow-weighted concentration of all daily discharges sampled or measured during a calendar month on which daily discharges are sampled and measured, divided by the number of daily discharges sampled and/or measured during such month.

(4) Monthly Average (Discharge) Limitation

The highest allowable average monthly discharge for any calendar month.

(5) Interference

"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. These reports shall include, but not necessarily be limited to, the Discharge Monitoring Report (DMR) and the Monthly Monitoring Report (MMR). All reports shall be submitted electronically by using the NetDMR application, upon registration, receipt of the NetDMR Subscriber Agreement, and IDEM approval of the proposed NetDMR Signatory. The NetDMR website (for initial registration and monthly DMR/MMR submittal) is: https://netdmr.epa.gov/netdmr/public/home.htm.

If the City of Franklin is agreeable to receiving an electronic version of the monthly reports, copies can be sent to the City of Franklin via NetDMR. An acceptable email address for the City of Franklin must be provided to IDEM's Compliance Data Section.

Any non-NetDMR reports sent to the City of Franklin shall be sent to the following:

Certified Operator
City of Franklin
796 South State Street
Franklin, IN 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 conducted and submitted for State approval within six months from the effective date of this permit.

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

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

(E) REOPENING CLAUSE

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

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

The permit, as modified or reissued under this paragraph, shall also contain any 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 and conditions of this permit;

(c) to inspect, at reasonable times:
(1) any monitoring equipment or method;
(2) any collection, treatment, pollution management, or discharge facilities; or
(3) practices required or otherwise regulated under the permit; and

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

(3) Change in Discharge

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

(a) be completed on a form prescribed by the commissioner;

(b) be signed in accordance with 327 IAC 5-2-22(a); and

(c) be submitted to the commissioner no later than 120 days prior to the date that the permittee intends to commence discharge containing the additional pollutant.

(4) Duty to Mitigate Adverse Impact

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

(5) Noncompliance Notification

(a) If the permittee does not or will not be able to comply for any reason with any discharge limitation specified in this permit, the permittee shall provide the Indiana Department of Environmental Management and the 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.

(2) Permit Renewal

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

(a) Be completed on a form prescribed by the commissioner;

(b) Be signed in accordance with 327 IAC 5-2-22(a);

(c) Be submitted to the commissioner no later than one hundred eighty (180) days prior to the expiration date of an existing permit if the industrial user intends to continue discharging to the POTW.

(3) Permit Modification

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

(a) report to the commissioner plans for or information about any activity that has occurred or will occur that would constitute cause for modification or revocation and reissuance;

(b) comply with the existing IWP permit until it is modified or reissued; and

(c) abide by the commissioner's decision:
(1) to modify or revoke and reissue the permit; and
(2) require submission of a new application as required by 327 IAC 5-21-3.

(4) Permit Transferability

(a) A permit may be transferred by the permittee to a new owner or operator only if the permit has been modified or revoked and reissued under 327 IAC 5-2-16(c)(1) or 16(e)(4), to identify the new permittee and incorporate such other requirements as may be necessary under the CWA. A permit may be transferred to another person by a permittee, without modification or revocation and reissuance being required, if the following occurs:
(1) The current permittee notifies the commissioner at least thirty (30) days in advance of the proposed transfer date.
(2) A written agreement containing a specific date for transfer of permit responsibility and coverage between the current permittee and the transferee (including acknowledgment that the existing permittee is liable for violations up to that date, and that the transferee is liable for violations from that date on) is submitted to the commissioner.
(3) The transferee certifies in writing to the commissioner intent to operate the facility without making such material and substantial alterations or additions to the facility as would significantly change the nature or quantities of pollutants discharged and thus constitute cause for permit modification under 327 IAC 5-2-16(d) . However, the commissioner may allow a temporary transfer of the permit without permit modification for good cause, e.g., to enable the transferee to purge and empty the facility's treatment system prior to making alterations, despite the transferee's intent to make such material and substantial alterations or additions to the facility.
(4) The commissioner, within thirty (30) days, does not notify the current permittee and the transferee of the intent to modify, revoke and reissue, or terminate the permit and to require that a new application be filed rather than agreeing to the transfer of the permit.

(5) Signature Requirements

(a) The reports required by Part I.C.2 of this Permit must be signed by one (1) of the following:
(1) A responsible corporate officer. As used in this subdivision, “responsible corporate officer” means:
(A) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or
(B) The manager of one (1) or more manufacturing, production, or operating facilities provided the manager is authorized to make management decisions that govern the operation of the regulated facility including having the explicit or implicit duty to make major capital investment recommendations, and initiating and directing other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
(2) A general partner or proprietor or manager if the industrial user submitting the reports is a partnership or sole proprietorship, respectively.
(3) A duly authorized representative of the individual designated in either Part II.B.5(a)(1)(A) or Part II.B.5(a)(1)(B) of this permit if:
(A) the authorization is made in writing by the individual described in either Part II.B.5(a)(1)(A) or Part II.B.5(a)(1)(B) of this permit;
(B) the authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the industrial discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and
(C) the written authorization is submitted to the 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 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.

(d) 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.

(e) 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 311of the Act.

(10) Property Rights

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

(11) Severability

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

TABLE 1.
TOXIC ORGANICS

I. ETHERS

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

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

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

IV. PHENOLS

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

V. AROMATICS

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-

VI. POLYNUCLEAR AROMATIC HYDROCARBONS (PAHs)

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

VII. PCB's

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

Industrial Wastewater Pretreatment (IWP)

Briefing Memo for

Material Handling Exchange, Incorporated

Draft: January 2017

Final: February 2017

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, IN 46203
Existing Permit Information:	Permit Number: INP000627 Expiration Date: March 18, 2018
Facility Contact:	Gary Sells, Operations Manager (317) 788-7225 gsells@m-h-e.com
Facility Location:	1001 Hurricane Street Franklin, IN 46131 Johnson County
Receiving POTW:	Franklin POTW 796 South State Street Franklin, IN 46131 NPDES Permit #IN0021181
Proposed Action:	Revoke and Reissue Date Application Received: December 27, 2017
Source Category	Industrial Pretreatment – 40 CFR 433.17 – New Source Metal Finishing Operations
Permit Writer:	Nicole Gardner, Section Chief (317) 232-8707 ngardner@idem.in.gov

Table of Contents

1.0 INTRODUCTION

The Indiana Department of Environmental Management (IDEM) received an Industrial Wastewater Pretreatment (IWP) Permit application for a modification from Material Handling Exchange, Inc. December 27, 2017. The current five year permit was issued with an effective date of April 5, 2013 in accordance with 327 IAC 5-2-6(a). The permit was subsequently modified on November 1, 2015, to change sampling type. Your request for an NPDES permit modification has been reviewed and processed in accordance with rules adopted under 327 IAC 5. Due to the close proximity of the requirement to submit a renewal application with the issuance of a modification, this Office proposes to revoke and reissue the NPDES permit.

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 433.17]. 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), Premium Composite Technology North America (INP000295), and A T Environmental (INP000652).

The POTW discharges to Youngs Creek (Q7,10 = 0.8CFS).

2.3 Discharge Description

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

Source	Flow (GPD)
Process Wastestream #1:	200-8,000
Sanitary:	800

(1) Process Wastestream #1 is wastewater from the powder coating and rinsing operations.

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

There are no changes, but due to an increased production, the sample type will be changed to 24 Hr. Composite.

3.0 PERMIT HISTORY

3.1 Compliance history

There are no current or pending enforcement actions regarding this 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 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. Please note: during the next permit renewal, applicable local ordinance limits that are more stringent that the New Source Metal Finishing Operations [40 CFR 33.17] standards will be added to this permit.

The permittee has elected to take samples after process and prior to combination with sanitary wastewater flows rather than end-of-pipe.

Since the permittee has elected to take samples after process and prior to combination with sanitary wastewater flows rather than end-of-pipe, the federal limitations that are protective of the POTW and the local limitations for 40 CFR 433.17 will be placed at internal Outfall 001.

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 (001)[1]. Outfall 001 is located in the Waste Pit following the powder coating operation, prior to combination with sanitary wastewater.

	Discharge Limitations			Monitoring Requirements	
Parameter[2]	Daily Maximum[6]	Monthly Average[6]	Unit	Measurement Frequency[4]	Sample Type [3]
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 Metals	1.20	0.65	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 Yearly	Grab

Parameter	Daily Minimum	Daily Maximum	Unit	Measurement Frequency	Sample Type
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; (ii) flow-proportional aliquots withdrawn at uniform time intervals; or (iii) for batch discharge, uniform aliquots withdrawn from uniform batch volumes.

Alternatively, a 24-hour composite sample may be obtained by an automatic sampler on an equal time interval basis over a twenty-four hour period provided that a minimum of 24 samples are taken and combined prior to analysis. The samples

do not need to be flow-proportioned if the permittee collects samples in this manner.

[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 Post Public Notice Addendum

The draft IWP permit for the Facility was made available for public comment from January 12, 2017 through February 20, 2017 as part of Public Notice No. 2017-1C-RD. During this comment period, no comment letters were received.

STATE OF INDIANA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
PUBLIC NOTICE NO: 2017 – 2B – F
DATE OF NOTICE: FEBRUARY 28, 2017

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

PRETREATMENT – REVOKE & REISSUE

MATERIAL HANDLING EXCHANGE, INC, Permit No. INP000627, JOHNSON COUNTY, 1001 Hurricane St, Franklin, IN. This industrial pretreatment permit is being revoked & reissued to modify the sampling type, from batch discharging to discharge 0.008 million gallons daily of process wastewater to the Franklin WWTP. Permit Manager: Beth Noel, bnoel@idem.in.gov, 317/234-8210.

Notice of Right to Administrative Review [Permits]

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

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

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

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

The Petition must contain the following information:

1. The name, address and telephone number of each petitioner.
2. A description of each petitioner's interest in the Permit.
3. A statement of facts demonstrating that each petitioner is:
    a. a person to whom the order is directed;
    b. aggrieved or adversely affected by the Permit; or
    c. entitled to administrative review under any law.
4. The reasons for the request for administrative review.
5. The particular legal issues proposed for review.
6. The alleged environmental concerns or technical deficiencies of the Permit.
7. The Permit terms and conditions that the petitioner believes would be appropriate and would comply with the law.
8. The identity of any persons represented by the petitioner.
9. The identity of the person against whom administrative review is sought.
10. A copy of the Permit that is the basis of the petition.
11. A statement identifying petitioner's attorney or other representative, if any.

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

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

If you seek to have a Permit stayed during the Administrative Review, you may need to file a Petition for a Stay of Effectiveness. The specific requirements for such a Petition can be found in 315 IAC 1-3-2 and 315 IAC 1-3-2.1.
Pursuant to IC 4-21.5-3-17, OEA will provide all parties with Notice of any pre-hearing conferences, preliminary hearings, hearings, stays, or orders disposing of the review of this action. If you are entitled to Notice under IC 4-21.5-3-5(b) and would like to obtain notices of any pre-hearing conferences, preliminary hearings, hearings, stays, or orders disposing of the review of this action without intervening in the proceeding you must submit a written request to OEA at the address above.
If you have procedural or scheduling questions regarding your Petition for Administrative Review you may contact the Office of Environmental Adjudication at (317) 232-8591 or see OEA's website at http://www.in.gov/oea.

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

IDEM
OFFICE OF
WATER QUALITY

December 19, 2016

2016 DEC 27 A 11: 29

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

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

Dear Pretreatment Section:

SES Environmental is submitting the attached application for modification (State Form 50271) and application feel of $50 (Check #7912) on behalf of Material Handling Exchange, Incorporated (MHE). 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 and included 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 is 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

APPLICATION FOR INDUSTRIAL WASTEWATER PRETREATMENT (IWP) PERMIT

State Form 50271 (R2 / 9-08)
Approved by State Board of Accounts, 2008
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

IDEM OFFICE OF WATER QUALITY
2016 DEC 27 A 11:29

INSTRUCTIONS:

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

Type of IWP Permit

- ☐ New
- ☐ Renewal
- ☒ Modification

IWP PERMIT NUMBER
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:	**4.** Facility e-mail address (optional):		
5. Address of operation: 1001 Hurricane Street			
City: Franklin	State: IN	ZIP Code: 46131	

DESIGNATED FACILITY CONTACT PERSON

6. Designated contact name (first, last): Gary Sells	**7.** Title: Operations Manager
8. Mailing address: 1001 Hurricane Street	

City: Franklin	State: IN	ZIP Code: 46131
9. Phone number: (317) 788-7225	**10.** E-mail address (optional): gsells@m-h-e.com	

DESIGNATED SIGNATORY AUTHORITY

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

11. Designated signatory authority name (first, last): Gary Sells	**12.** Title: Operations Manager
13. Address: 1001 Hurricane Street	

City: Franklin, Indiana	State: IN	ZIP Code: 46131
14. Phone number: (317) 788-7225	**15.** E-mail address (optional): gsells@m-h-e.com	

(Continued on page 2)

(Account No. and Revenue Code: 2830-433800-100600)

RECEIVING POTW: City of Franklin

16. Contact Name	17. Title:
Richard Littleton	Superintendent

18. Address:
796 State Street

City:	State:	ZIP Code:
Franklin	IN	46131

19. Phone number: (888) 736-6709 **20.** E-mail address (optional): dpwsuperintendent@franklin.in

PART B: OPERATING SCHEDULE

SHIFT INFORMATION

21. Days of operation *(check all that apply)*: ☒ Mon. ☒ Tue. ☒ Wed. ☒ Thu. ☒ Fri. ☐ Sat. ☐ Sun.

22. Hours per day of operation: 8

23. Number of shifts per day: 1

24. Total number of employees per shift: 80

DURATION OF OPERATION

25. Date that facility began (or will begin) operation (mm/dd/yyyy): 04/15/2013

26. Indicate whether the operation is (will be):
☒ a. Continuous throughout the year
☐ b. Seasonal (check the boxes below corresponding with the months of active production)
☐ Jan. ☐ Feb. ☐ Mar. ☐ April ☐ May ☐ June ☐ July ☐ Aug. ☐ Sept. ☐ Oct. ☐ Nov. ☐ Dec.

CLOSED-LOOP OPERATIONS

27. Describe any closed-loop operations:

Stage 1 of the wash system is heated with a closed loop heat exchanger.

28. Does this water ever contact the product? ☒ Yes ☐ No

29. Does the system ever discharge to the city sewer? ☒ Yes* ☐ No

***If yes,**
a. How often? Continuous
b. How much? 200 - 8,000 gpd
c. Is this water pretreated? ☐ Yes ☒ 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 continuously. The average production projection for the facility for the remainder of 2016 and 2017 is 180,000 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 200 to 8,000 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 dryed. The washing process utilizes an iron phosphate cleaning and coating solution to clean and prepare the metal substrate for painting. Stages 2 and 3 of the washer are rinse stages that utilize city water. The washing process generates an estimated 3.5 to 17 gallons per minute of wastewater from Stage 2 that will be discharged to the sanitary sewer. The need for wastewater treatment prior to discharge to the sanitary sewer system may not be necessary. However, during some production days, it may be 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 are then 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) Hot Rolled Steel
2) Iron Phosphate
3) Hydroxlamine Sulphate
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 180,000 square feet of metal substrate per week are 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: Franklin, Indiana	400 to 8,500
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: 8 GPD

c. Evaporation: 10 GPD

d. Contained in product: 0 GPD

e. Other*: 800 GPD

*Specify:

Sanitary Sewer - from employees

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	200 - 8,000	☒ Actual Volume ☐ Expected Volume	☒	☐	☐
b.	Process Waste-stream #2		☐ Actual Volume ☐ Expected Volume	☐	☐	☐
c.	Process Waste-stream #3		☐ Actual Volume ☐ Expected Volume	☐	☐	☐
d.	Pretreatment Discharge (if any)		☐ Actual Volume ☐ Expected Volume	☐	☐	☐
e.	Boiler Blowdown		☐ Actual Volume ☐ Expected Volume	☐	☐	☐
f.	Non-contact Cooling Water (once through)		☐ Actual Volume ☐ Expected Volume	☐	☐	☐
g.	Sanitary Water	800	☐ Actual Volume ☒ Expected Volume	☒	☐	☐
h.	Other **Specify:** _____		☐ Actual Volume ☐ Expected Volume	☐	☐	☐

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 ☒ Yes[1] ☐ No ☐ N/A

b. Sampling equipment ☐ Yes[1] ☒ No ☐ N/A

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

MHE utilizes an ISTEC 1700 series Multi-Jet meter to monitor wastewater flow to Outfall #001.

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?

☐ Yes[2]** ☒ 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 may be necessary to adjust pH during discharge

Attach a process-flow diagram of the pretreatment.

PART K: SAMPLING DATA

49. Attach any representative sampling data[3] pertaining to the facility discharge to the sewer system. Explain below and/or in the attachment(s) where and when the sampling was accomplished, what type of sample was taken (i.e., grab, composite), and how many samples were analyzed. Be sure the sampling and analytical methods conform to 40 CFR Part 136. If they do not, indicate what method was used.

Attach any sampling data[3] 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 tobe 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:

Chemical storage containers are manually added as needed, based on daily titration measurements, to stage 1 of the parts washer system.

▶ 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 from parts washing		Off site treatment and disposal
b.	Used bath fluids		Off site treatment and disposal
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."

Gary Sells
Name/Title

12/12/2016
Date (mm/dd/yyyy)

Signature

317-850-3315
Phone # ((xxx) xxx-xxxx)

TABLE 1: POLLUTANTS OF CONCERN

PRIORITY POLLUTANTS LIST
(40 CFR 403, APENDIX B)

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

	TOXIC ORGANICS: ETHERS
☐	Ether, bis(2-chloroethyl)
☐	Ether, bis(2-chloroisopropyl)
☐	Ether, 2-chloroethyl vinyl
☐	Ether, 4-chlorophenyl phenyl
☐	Ether, 4-bromophenyl phenyl
☐	Bis (2-chloroethoxy) methane

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

	TOXIC ORGANICS: NITROGEN COMPOUNDS
☐	Nitrosamine, dimethyl-
☐	Nitrosamine, diphenyl-
☐	Nitrosamine, di-n-propyl-
☐	Benzidine
☐	Benzidine, 3,3'-dichloro-
☐	Hydrazine, 1,2-diphenyl-
☐	Acrylonitrile

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

	TOXIC ORGANICS: AROMATICS
☐	Benzene
☐	Benzene, chloro-
☐	Benzene, 1,2-dichloro-
☐	Benzene, 1,3-dichloro-
☐	Benzene, 1,4-dichloro-
☐	Benzene, hexachloro-; HCB
☐	Benzene, ethyl-
☐	Benzene, nitro-
☐	Toluene
☐	Toluene, 2,4-dinitro-; DNT
☐	Toluene, 2,6-dinitro-
☐	Benzene, 1,2,4-trichloro-

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

	TOXIC ORGANICS: PCB's
☐	PCB-1016; Aroclor 1016
☐	PCB-1221; Aroclor 1221
☐	PCB-1232; Aroclor 1232
☐	PCB-1242; Aroclor 1242
☐	PCB-1248; Aroclor 1248
☐	PCB-1254; Aroclor 1254
☐	PCB-1260; Aroclor 1260

	TOXIC ORGANICS: HALOGENATED ALIPHATIC HYDROCARBONS
☐	Methane, chloro-; methyl chloride
☐	Methane, dichloro-; Methylene chloride
☐	Methane, trichloro-; chloroform
☐	Methane, tetrachloro-; Carbon tetrachloride
☐	Methane, bromo-; methyl bromide
☐	Methane, dichlorobromo-
☐	Methane, chlorodibromom-
☐	Methane, tribromo-; bromoform
☐	Ethane, chloro-

TABLE 1: POLLUTANTS OF CONCERN (CONTINUED)	
TOXIC ORGANICS: HALOGENATED ALIPHATIC HYDROCARBONS	**CONVENTIONAL POLLUTANTS: (LISTED IN 40 CFR 401.16)**
☐ Ethane, 1,1-dichloro-	☐ Biochemical Oxygen Demand (BOD)
☐ Ethane, 1,2-dichloro-	☒ pH (Acid or Base)
☐ Ethane, 1,1,1-trichloro-	☐ Total Suspended Solids (TSS)
☐ Ethane, 1,1,2-trichloro-	☒ Oil and Grease (O&G)
☐ Ethane, 1,1,2,2-tetrachloro-	
☐ Ethane, hexachloro-	**NONCONVENTIONAL POLLUTANTS OF CONCERN: (NOT LISTED AS TOXIC OR CONVENTIONAL)**
☐ Ethylene, chloro-; Vinyl Chloride	
☐ Ethylene, 1,1-dichloro-; 1,1-DCE	☐ Ammonia (NH3)
☐ Ethylene, 1,2-trans-dichloro-	☐ Chlorides (Cl-1)
☐ Ethylene, trichloro-; TCE	☐ Sulfides (S-2)
☐ Ethylene, tetrachloro-; Perchloroethylene	☐ Total Dissolved Solids (TDS)
☐ Propane, 1,2-dichloro-	☐ Phosphate (PO4)
☐ Propylene, 1,3-dichloro-	☐ Chemical Oxygen Demand (COD)
☐ Butadiene, hexachloro-; HCBD	
☐ Cyclopentadiene, hexachloro-; HCCPD	
TOXIC ORGANICS: 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	
TOXIC ORGANICS: OXYGENATED COMPOUNDS	
☐ Acrolein	
TOXIC ORGANICS: MISCELLANEOUS	
☐ Isophorone	
☐ 2,3,7,8-tetrachlorodibenzo-p-dioxin; TCDD; dioxin	

REQUIRED APPLICATION ATTACHMENTS

PART F: WASTEWATER DISCHARGES TO SANITARY OR COMBINED SEWERS

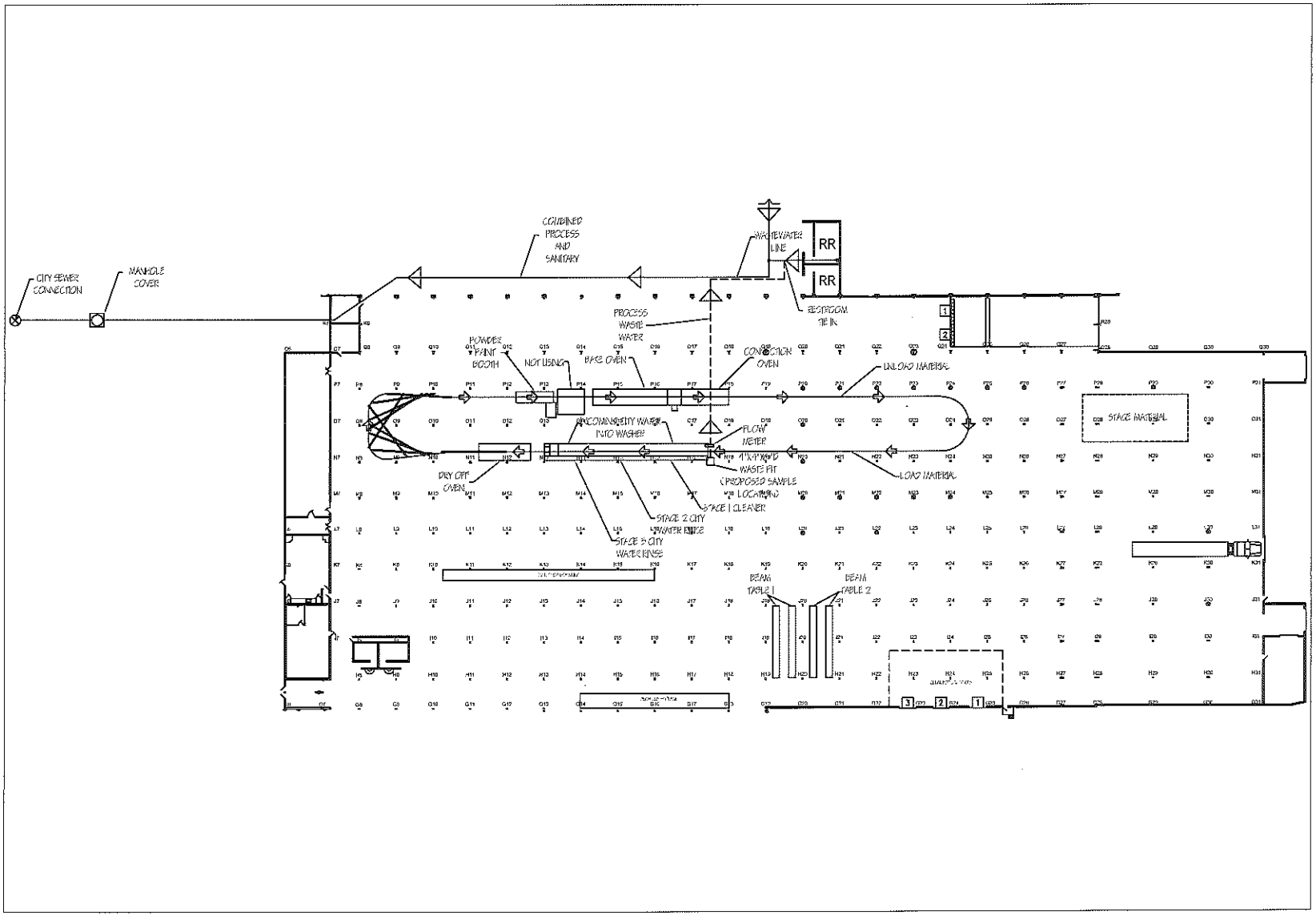
36. a. It is anticipated that approximately 200 to 8,000 gallons of wastewater will be discharged from Stage 2 of the washing system. This is a rinse stage that consists of city water.

36. g. It is anticipated that 800 gallons of sanitary wastewater per day will be generated by approximately 80 employees utilizing the rest room facilities 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

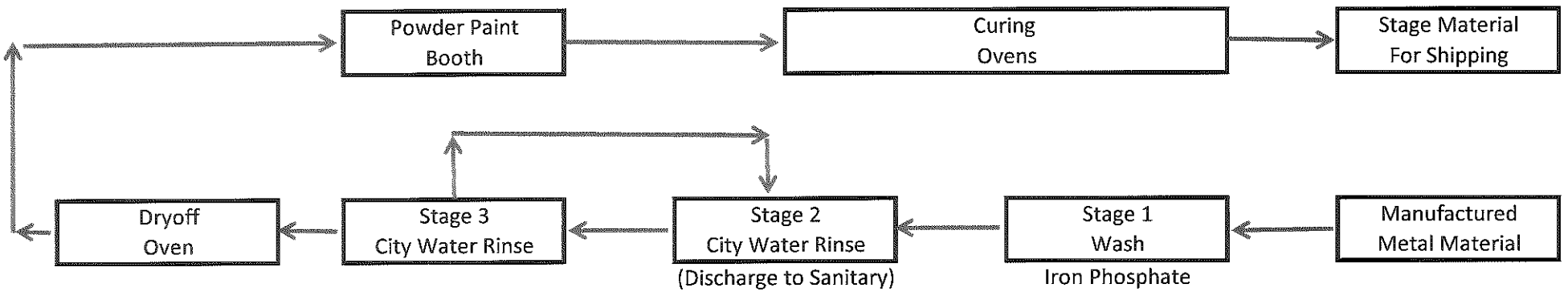
No.	Revision/Issue	Date
6	[illegible]	[illegible]
5	[illegible]	[illegible]
4	[illegible]	[illegible]
3	[illegible]	[illegible]
2	[illegible]	[illegible]
1	[illegible]	[illegible]

CNC DESIGN
6202 W BIG HURRICANE RD
MARTINSVILLE, IN 46151
765-275-9019

M-K-E
1800 CHURCHMAN AVE
INDIANAPOLIS, IN 46203

Project: HENRY ST. POWDER BOOTH	Sheet: HSP3A
Date: 1-23-13	
Scale: NOT TO SCALE	

MHE PROCESS FLOW DIAGRAM



PART K:

49. Analytical results of representative samples from the process.

ENVision Laboratories, Inc.
1439 Sadlier Circle West Drive
Indianapolis, IN 46239
Tel: 317.351.8632
Fax: 317.351.8639
www.envisionlaboratories.com

Mr. Josh Richards
Material Handling Exchange, Inc.
1800 Churchman Ave
Indianapolis, IN 46203

April 29, 2015

ENVision Project Number: 2015-856
Client Project Name: MHE Powder Coat

Dear Mr. Richards,

Please find the attached analytical report for the samples received April 10, 2015. All test methods performed were fully compliant with local, state, and federal EPA methods unless otherwise noted. The project was analyzed as requested on the enclosed chain of custody record. Please review the comments section for additional information about your results or Quality Control data.

Feel free to contact me if you have any questions or comments regarding your analytical report or service.

Thank you for your business. ENVision Laboratories looks forward to working with you on your next project.

Yours Sincerely,

Cheryl A. Crum

Cheryl A. Crum

Director of Project Management
ENVision Laboratories, Inc.

ENVision Laboratories, Inc.
1439 Sadlier Circle West Drive
Indianapolis, IN 46239
Tel: 317.351.8632
Fax: 317.351.8639
www.envisionlaboratories.com

ENVISION

Analytical Report

Client Name: MHE

Project ID: MHE POWDER COAT

Client Project Manager: JOSH RICHARDS

ENVision Project Number: 2015-856

Analytical Method: EPA 624
Prep Method: EPA 5030B
Analytical Batch: 041515VW

Client Sample ID: OUTFALL 001A
Envision Sample Number: 15-6708
Sample Matrix: water

Sample Collection Date/Time: 4/9/15
Sample Received Date/Time: 4/10/15 11:07

Compounds	Sample Results (ug/L)	Reporting Limit (ug/L)	Flags
Benzene	< 5	5	
Bromodichloromethane	< 5	5	
Bromoform	< 5	5	
Bromomethane	< 5	5	
Carbon Tetrachloride	< 5	5	
Chlorobenzene	< 5	5	
Chloroethane	< 5	5	
2-Chloroethylvinylether	< 50	50	
Chloroform	< 5	5	
Chloromethane	< 5	5	
Dibromochloromethane	< 5	5	
1,2-Dichlorobenzene	< 5	5	
1,3-Dichlorobenzene	< 5	5	
1,4-Dichlorobenzene	< 5	5	
1,1-Dichloroethane	< 5	5	
1,2-Dichloroethane	< 5	5	
1,1-Dichloroethene	< 5	5	
cis-1,2-Dichloroethene	< 5	5	
trans-1,2-Dichloroethene	< 5	5	
1,2-Dichloropropane	< 5	5	
cis-1,3-Dichloropropene	< 5	5	
trans-1,3-Dichloropropene	< 5	5	
Ethylbenzene	< 5	5	
Methylene chloride	< 5	5	
1,1,2,2-Tetrachloroethane	< 5	5	
Tetrachloroethene	< 5	5	
Toluene	< 5	5	
1,1,1-Trichloroethane	< 5	5	
1,1,2-Trichloroethane	< 5	5	
Trichloroethene	< 5	5	
Trichlorofluoromethane	< 5	5	
Vinyl chloride	< 2	2	
Xylene (Total)	< 10	10	
Dibromofluoromethane (surrogate)	99%		
1,2-Dichloroethane-d4 (surrogate)	94%		
Toluene-d8 (surrogate)	99%		
4-bromofluorobenzene (surrogate)	98%		
Analysis Date/Time:	04-15-15/01:28		
Analyst Initials	tig		

ENVision Laboratories, Inc.
1439 Sadlier Circle West Drive
Indianapolis, IN 46239
Tel: 317.351.8632
Fax: 317.351.8639
www.envisionlaboratories.com

ENVISION

Analytical Report

Client Name: MHE

Project ID: MHE POWDER COAT

Client Project Manager: JOSH RICHARDS

ENVision Project Number: 2015-856

Analytical Method: EPA 6010
Prep Method: EPA 3010A

Client Sample ID: OUTFALL 001A
Envision Sample Number: 15-6708
Sample Matrix: water

Sample Collection Date/Time: 4/9/15
Sample Received Date/Time: 4/10/15 11:07

Compounds	Sample Results (ug/L)	Reporting Limit (ug/L)	Flags
Cadmium	< 5	5	
Chromium	< 10	10	
Copper	**1,300**	20	
Lead	< 10	10	
Nickel	**450**	50	
Silver	< 50	50	
Zinc	< 50	50	

ICP Analysis Date/Time: 4-15-15/14:30
Analyst Initials: gjd
Date Digested: 4/14/2015
Initial Sample Volume: 50 mL
Final Volume: 50 mL
Analytical Batch: 041515icp

First Environmental Laboratories, Inc.
IL ELAP / NELAC Accreditation # 100292
1600 Shore Road • Naperville, Illinois 60563 • Phone (630) 778-1200 • Fax (630) 778-1233

April 28, 2015

Ms. Cheryl Crum
ENVISION LABORATORIES, INC.
1439 Sandlier Cir. W. Drive
Indianapolis, IN 46239

Project ID: 2015-856
First Environmental File ID: 15-1703
Date Received: April 14, 2015

Dear Ms. Cheryl Crum:

The above referenced project was analyzed as directed on the enclosed chain of custody record.

All Quality Control criteria as outlined in the methods and current IL ELAP/NELAP have been met unless otherwise noted. QA/QC documentation and raw data will remain on file for future reference. Our accreditation number is 100292 and our current certificate is number 003596: effective 03/24/2015 through 03/28/2016.

I thank you for the opportunity to be of service to you and look forward to working with you again in the future. Should you have any questions regarding any of the enclosed analytical data or need additional information, please contact me at (630) 778-1200.

Sincerely,

Stan Zaworski
Project Manager

First
Environmental
Laboratories, Inc.
IL ELAP / NELAC Accreditation # 100292
1600 Shore Road • Naperville, Illinois 60563 • Phone (630) 778-1200 • Fax (630) 778-1233

Case Narrative

ENVISION LABORATORIES, INC.

Lab File ID: **15-1703**

Project ID: **2015-856**

Date Received: **April 14, 2015**

All quality control criteria, as outlined in the methods, have been met except as noted below or on the following analytical report.

The results in this report apply to the samples in the following table:

Laboratory Sample ID	Client Sample Identifier	Date/Time Collected
15-1703-001	15-6708/Outfall 001A	4/9/2015

Sample Batch Comments:

Sample acceptance criteria were met.

Method Comments

Lab Number	Sample ID	Comments:
15-1703-001	15-6708/Outfall 001	*Pesticides/PCBs* Surrogate recovery outside control limits; low bias due to matrix interference
15-1703-001	15-6708/Outfall 001	*Semi-Volatile Compounds* The reporting limits are elevated due to matrix interference.

The following is a definition of flags that may be used in this report:

Flag	Description	Flag	Description
<	Analyte not detected at or above the reporting limit.	L	LCS recovery outside control limits.
C	Sample received in an improper container for this test.	M	MS recovery outside control limits; LCS acceptable.
D	Surrogates diluted out; recovery not available.	N	Analyte is not part of our NELAC accreditation.
E	Estimated result; concentration exceeds calibration range.	P	Chemical preservation pH adjusted in lab.
G	Surrogate recovery outside control limits.	Q	Result was determined by a GC/MS database search.
H	Analysis or extraction holding time exceeded.	S	Analysis was subcontracted to another laboratory.
J	Estimated result; concentration is less than routine RL but greater than MDL.	W	Reporting limit elevated due to sample matrix.
RL	Routine Reporting Limit (Lowest amount that can be detected when routine weights/volumes are used without dilution.)	ND	Analyte was not detected using a library search routine; No calibration standard was analyzed.

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Analytical Report

Client: ENVISION LABORATORIES, INC.
Project ID: 2015-856
Sample ID: 15-6708/Outfall 001A
Sample No: 15-1703-001

Date Collected: 04/09/15
Time Collected:
Date Received: 04/14/15
Date Reported: 04/28/15

Analyte	Result	R.L.	Units	Flags
Semi-Volatile Compounds **Method: 625** Analysis Date: 04/20/15		**Preparation Method 625W** Preparation Date: 04/16/15		
Acenaphthene	< 100	10	ug/L	
Acenaphthylene	< 100	10	ug/L	
Anthracene	< 100	10	ug/L	
Benzidine	< 100	10	ug/L	
Benzo(a)anthracene	< 100	10	ug/L	
Benzo(a)pyrene	< 100	10	ug/L	
Benzo(b)fluoranthene	< 100	10	ug/L	
Benzo(k)fluoranthene	< 100	10	ug/L	
Benzo(ghi)Perylene	< 100	10	ug/L	
bis(2-Chloroethoxy)methane	< 100	10	ug/L	
bis(2-Chloroethyl)ether	< 100	10	ug/L	
bis(2-Chloroisopropyl)ether	< 100	10	ug/L	
bis(Chloromethyl)ether	ND		ug/L	N
bis(2-Ethylhexyl)phthalate	< 50	5	ug/L	
4-Bromophenyl phenyl ether	< 100	10	ug/L	
Butyl benzyl phthalate	< 100	10	ug/L	
4-Chloro-3-methylphenol	< 200	20	ug/L	
2-Chloronaphthalene	< 100	10	ug/L	
2-Chlorophenol	< 100	10	ug/L	
4-Chlorophenyl phenyl ether	< 100	10	ug/L	
Chrysene	< 100	10	ug/L	
Dibenzo(a,h)anthracene	< 100	10	ug/L	
1,2-Dichlorobenzene	< 100	10	ug/L	
1,3-Dichlorobenzene	< 100	10	ug/L	
1,4-Dichlorobenzene	< 100	10	ug/L	
3,3'-Dichlorobenzidine	< 200	20	ug/L	
2,4-Dichlorophenol	< 100	10	ug/L	
Diethyl phthalate	< 100	10	ug/L	
2,4-Dimethylphenol	< 100	10	ug/L	
Dimethyl phthalate	< 100	10	ug/L	
Di-n-butyl phthalate	< 100	10	ug/L	
4,6-Dinitro-o-Cresol	< 500	50	ug/L	
2,4-Dinitrophenol	< 100	10	ug/L	
2,4-Dinitrotoluene	< 100	10	ug/L	
2,6-Dinitrotoluene	< 100	10	ug/L	
Di-n-octylphthalate	< 100	10	ug/L	

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Analytical Report

Client: ENVISION LABORATORIES, INC.
Project ID: 2015-856
Sample ID: 15-6708/Outfall 001A
Sample No: 15-1703-001

Date Collected: 04/09/15
Time Collected:
Date Received: 04/14/15
Date Reported: 04/28/15

Analyte		Result	R.L.	Units	Flags
Semi-Volatile Compounds	**Method: 625**		**Preparation Method 625W**		
Analysis Date: 04/20/15			Preparation Date: 04/16/15		
1,2-Diphenylhydrazine (as Azobenzene)		< 100	10	ug/L	
Fluoranthene		< 100	10	ug/L	
Fluorene		< 100	10	ug/L	
Hexachlorobenzene		< 50	5	ug/L	
Hexachlorobutadiene		< 100	10	ug/L	
Hexachlorocyclopentadiene		< 100	10	ug/L	
Hexachloroethane		< 50	5	ug/L	
Indeno(1,2,3-cd)pyrene		< 100	10	ug/L	
Isophorone		< 100	10	ug/L	
Naphthalene		< 100	10	ug/L	
Nitrobenzene		< 100	10	ug/L	
2-Nitrophenol		< 100	10	ug/L	
4-Nitrophenol		< 500	50	ug/L	
n-Nitrosodi-n-propylamine		< 100	10	ug/L	
n-Nitrosodimethylamine		< 100	10	ug/L	
n-Nitrosodiphenylamine		< 100	10	ug/L	
Pentachlorophenol		< 100	10	ug/L	
Phenanthrene		< 100	10	ug/L	
Phenol		< 100	10	ug/L	
Pyrene		< 100	10	ug/L	
1,2,4-Trichlorobenzene		< 100	10	ug/L	
2,4,6-Trichlorophenol		< 100	10	ug/L	
Pesticides/PCBs	**Method: 608**		**Preparation Method 608W**		
Analysis Date: 04/27/15			Preparation Date: 04/15/15		
Aldrin		< 0.05	0.05	ug/L	
Aroclor 1016		< 0.50	0.50	ug/L	
Aroclor 1221		< 0.50	0.50	ug/L	
Aroclor 1232		< 0.50	0.50	ug/L	
Aroclor 1242		< 0.50	0.50	ug/L	
Aroclor 1248		< 0.50	0.50	ug/L	
Aroclor 1254		< 0.50	0.50	ug/L	
Aroclor 1260		< 0.50	0.50	ug/L	
Polychlorinated biphenyls (Total)		< 0.50	0.50	ug/L	
alpha-BHC		< 0.05	0.05	ug/L	
beta-BHC		< 0.05	0.05	ug/L	
delta-BHC		< 0.05	0.05	ug/L	

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Analytical Report

Client: ENVISION LABORATORIES, INC.
Project ID: 2015-856
Sample ID: 15-6708/Outfall 001A
Sample No: 15-1703-001

Date Collected: 04/09/15
Time Collected:
Date Received: 04/14/15
Date Reported: 04/28/15

Analyte	Result	R.L.	Units	Flags
Pesticides/PCBs **Method: 608**		**Preparation Method 608W**		
Analysis Date: 04/27/15		Preparation Date: 04/15/15		
gamma-BHC (Lindane)	< 0.05	0.05	ug/L	
alpha-Chlordane	< 0.50	0.50	ug/L	
gamma-Chlordane	< 0.50	0.50	ug/L	
Chlordane (Technical)	< 0.50	0.50	ug/L	
4,4'-DDD	< 0.10	0.10	ug/L	
4,4'-DDE	< 0.10	0.10	ug/L	
4,4'-DDT	< 0.10	0.10	ug/L	
Dieldrin	< 0.10	0.10	ug/L	
Endosulfan I	< 0.05	0.05	ug/L	
Endosulfan II	< 0.10	0.10	ug/L	
Endosulfan sulfate	< 0.10	0.10	ug/L	
Endrin	< 0.10	0.10	ug/L	
Endrin aldehyde	< 0.10	0.10	ug/L	
Endrin ketone	< 0.10	0.10	ug/L	
Heptachlor	< 0.05	0.05	ug/L	
Heptachlor epoxide	< 0.05	0.05	ug/L	
Methoxychlor	< 0.50	0.50	ug/L	
Toxaphene	< 1.0	1.0	ug/L	
Cyanide, Total **Method: 4500CN,C,E 1999**				
Analysis Date: 04/15/15				
Cyanide, Total	0.524	0.005	mg/L	

Sample QC Summary: ***Surrogate Recovery***

Method	*Analyte*	*QC Result*			*%R Limits Low*	*High*
608	*Decachlorobiphenyl (Surr)*	*%R:*	*30.6*		*24*	*131*
608	*Tetrachloro-m-xylene (Surr)*	*%R:*	*44.7*	*	*51*	*120*
625	*2,4,6-Tribromophenol (Surr)*	*%R:*	*80.9*		*41*	*127*
625	*2-Fluorobiphenyl (Surr)*	*%R:*	*93.7*		*50*	*94*
625	*2-Fluorophenol (Surr)*	*%R:*	*53.2*		*18*	*55*
625	*d14-Terphenyl (Surr)*	*%R:*	*57.4*		*29*	*115*
625	*d5-Nitrobenzene (Surr)*	*%R:*	*70.1*		*47*	*93*
625	*Phenol-d5 (surr)*	*%R:*	*47.6*	*	*12*	*41*

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Quality Control Summary

Client: ENVISION LABORATORIES, INC. **Lab File ID:** 15-1703

Project ID: 2015-856 **Date Received:** 4/14/2015

QC Lab#	Time QC Code	Parameter	Reported Result	Units	QC Result	%R Limits Low	%R Limits High	RPD	RPD Limit
Parameter:	Cyanide, Total	**Analytical Method:**	4500CN,C,E 1999		**Analytical WS #:** 128533	**Analysis Date:**			4/15/2015
15-1638-001MS	MS	Cyanide, Total	0.203	mg/L	%R: 101.5	75	125		
15-1638-001MSD	MSD	Cyanide, Total	0.203	mg/L	%R: 101.5	75	125	RPD: 0	20
CCB262537	CB	Cyanide, Total	< 0.005	mg/L	0	-			
CCB262538	CB	Cyanide, Total	< 0.005	mg/L	0	-			
CCVS262539	CCVS	Cyanide, Total	0.500	mg/L	%R: 100	90	110		
CCVS262540	CCVS	Cyanide, Total	0.500	mg/L	%R: 100	90	110		
LCS262541	LCS	Cyanide, Total	0.950	mg/L	%R: 95	80	120		
PB262544	PB	Cyanide, Total	< 0.005	mg/L	0	-			

" The QC indicator is outside control limits. %R = percent recovery; RPD = Relative percent difference
CB = Calibration Blank; CCVS = Continuing Calibration Verification Standard; MS = Matrix Spike;
MSD = Matrix Spike Duplicate; LCS = Laboratory Control Spike; SURR = Surrogate Spiking Compound;
PB = Procedure Blank; BLK = Method Blank

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EPA 624 Quality Control Data

ENVision Batch Number: 041515VW

Method Blank (MB):	MB Results (ug/L)	Rep Lim (ug/L)	Flag
Benzene	< 5	5	
Bromodichloromethane	< 5	5	
Bromoform	< 5	5	
Bromomethane	< 5	5	
Carbon Tetrachloride	< 5	5	
Chlorobenzene	< 5	5	
Chloroethane	< 5	5	
2-Chloroethylvinylether	< 50	50	
Chloroform	< 5	5	
Chloromethane	< 5	5	
Dibromochloromethane	< 5	5	
1,2-Dichlorobenzene	< 5	5	
1,3-Dichlorobenzene	< 5	5	
1,4-Dichlorobenzene	< 5	5	
1,1-Dichloroethane	< 5	5	
1,2-Dichloroethane	< 5	5	
1,1-Dichloroethene	< 5	5	
cis-1,2-Dichloroethene	< 5	5	
trans-1,2-Dichloroethene	< 5	5	
1,2-Dichloropropane	< 5	5	
cis-1,3-Dichloropropene	< 5	5	
trans-1,3-Dichloropropene	< 5	5	
Ethylbenzene	< 5	5	
Methylene chloride	< 5	5	
1,1,2,2-Tetrachloroethane	< 5	5	
Tetrachloroethene	< 5	5	
Toluene	< 5	5	
1,1,1-Trichloroethane	< 5	5	
1,1,2-Trichloroethane	< 5	5	
Trichloroethene	< 5	5	
Trichlorofluoromethane	< 5	5	
Vinyl chloride	< 2	2	
Xylene (total)	< 10	10	
Dibromofluoromethane (surrogate)	102%		
1,2-Dichloroethane-d4 (surrogate)	99%		
Toluene-d8 (surrogate)	99%		
4-bromofluorobenzene (surrogate)	99%		
Analysis Date/Time:	04-15-15/01:07		
Analyst Initials	tjg		

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624 QC Continued...

Laboratory Control Standard (LCS):	LCS Results (ug/L)	LCS Conc(ug/L)	% Rec	Flag
Benzene	51.3	50	103%	
Bromodichloromethane	53.6	50	107%	
Bromoform	54.1	50	108%	
Bromomethane	51.7	50	103%	
Carbon Tetrachloride	51.5	50	103%	
Chlorobenzene	52.2	50	104%	
Chloroethane	52.6	50	105%	
2-Chloroethylvinylether	211	200	106%	
Chloroform	51.0	50	102%	
Chloromethane	47.0	50	94%	
Dibromochloromethane	53.7	50	107%	
1,2-Dichlorobenzene	57.0	50	114%	
1,3-Dichlorobenzene	57.5	50	115%	
1,4-Dichlorobenzene	57.4	50	115%	
1,1-Dichloroethane	52.4	50	105%	
1,2-Dichloroethane	53.4	50	107%	
1,1-Dichloroethene	52.2	50	104%	
cis-1,2-Dichloroethene	52.4	50	105%	
trans-1,2-Dichloroethene	51.2	50	102%	
1,2-Dichloropropane	52.7	50	105%	
cis-1,3-Dichloropropene	53.3	50	107%	
trans-1,3-Dichloropropene	53.8	50	108%	
Ethylbenzene	52.2	50	104%	
Methylene chloride	51.6	50	103%	
1,1,2,2-Tetrachloroethane	53.5	50	107%	
Tetrachloroethene	48.0	50	96%	
Toluene	50.4	50	101%	
1,1,1-Trichloroethane	51.1	50	102%	
1,1,2-Trichloroethane	53.4	50	107%	
Trichloroethene	53.7	50	107%	
Trichlorofluoromethane	49.9	50	100%	
Vinyl chloride	50.9	50	102%	
Xylene (total)	158	150	105%	
Dibromofluoromethane (surrogate)	95%			
1,2-Dichloroethane-d4 (surrogate)	91%			
Toluene-d8 (surrogate)	90%			
4-bromofluorobenzene (surrogate)	93%			
Analysis Date/Time:	04-15-15/00:03			
Analyst Initials	tjg			

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EPA 6010B Metals Quality Control Data

ENVision Batch Number: 041515icp

Method Blank (MB):	MB Results(mg/L)	Rep Lim (mg/L)	Flag
Cadmium	< 0.005	0.005	
Chromium	< 0.01	0.01	
Copper	< 0.02	0.02	
Lead	< 0.01	0.01	
Nickel	< 0.05	0.05	
Silver	< 0.05	0.05	
Zinc	< 0.05	0.05	
Analysis Date/Time:	4-15-15/14:07		
Analyst Initials:	gjd		

Laboratory Control Standard (LCS):	LCS Results (mg/L)	LCS Conc.(mg/L)	% Rec	Flag
Cadmium	0.54	0.50	108%	
Chromium	0.50	0.50	100%	
Copper	0.53	0.50	106%	
Lead	0.51	0.50	102%	
Nickel	0.56	0.50	112%	
Silver	0.54	0.50	108%	
Zinc	0.47	0.50	94%	
Analysis Date/Time:	4-15-15/14:03			
Analyst Initials:	gjd			

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Flag Number	Comments

ENVision Proj#: 2015-8560 Page ____ of ____

CHAIN OF CUSTODY RECORD

ENVision Laboratories, Inc. | 1439 Sadlier Circle West Drive | Indianapolis, IN 46239 | Phone: (317) 351-8632 | Fax: (317) 351-8639

Client: Kain Lawrence / MHE	Invoice Address: Attn: Debbie 1600 Churchman Ave. 46203
Report Address: 1001 Hurricane Rd.	Project Name: MHE Powder Coat
Report To: Ray Kassab/Josh Richards	Lab Contact:
Phone: 317-788-7225	Sampled by: Colby Long
Fax:	P.O. Number:
Desired TAT: (Please Circle One) 1-2 days 3-6 days Std (7 bus. days)	QA/QC Required: (circle if applicable) Level III Level IV

REQUESTED PARAMETERS

Sample Integrity:
Cooler Temp: 5 °C (Circle)
Samples on Ice? Yes No
Samples Intact? Yes No
Custody Seal: Yes (No)
ENVision provided bottles: Yes No
VOC vials free of head-space: Yes No N/A
pH checked? Yes No N/A
Method 5035 Collection used? Yes No
5035 samples received within 48 hr of Collection? Yes No

Please indicate number of containers per preservative below

Sample ID	Coll. Date	Coll. Time	Comp (C) Grab (G)	Matrix	VOC 624	SVOC 625	Pesticides 608 + PCBs	Metals	Cyanide, Total	HCl	HNO_3	H_2SO_4	NaOH	Other	None	ENVision Sample ID
Outfall 001A	4/9/15	2:00	G	Water	X					X						Sealed pH 6.8 15-6708
Outfall 001A	4/9/15	2:30	G	Water		X									X	
Outfall 001A	4/9/15	2:06	G	Water			X								X	
Outfall 001A	4/9/15	2:13	G	Water				X			X				X	
Outfall 001A	4/9/15	2:21	C G	Water					X				X			

Comments: Field pH: Recalculated 4/1/15 @ 3:08pm.

Relinquished by:	Date	Time	Received by:	Date	Time
Colby Long	4/10/15	11:07		4/10/15	11:07

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Mr. Josh Richards
Material Handling Exchange, Inc.
1800 Churchman Ave
Indianapolis, IN 46203

February 16, 2015

ENVision Project Number: 2015-258
Client Project Name: MHE Powder Coat

Dear Mr. Richards,

Please find the attached analytical report for the samples received February 4, 2015. All test methods performed were fully compliant with local, state, and federal EPA methods unless otherwise noted. The project was analyzed as requested on the enclosed chain of custody record. Please review the comments section for additional information about your results or Quality Control data.

Feel free to contact me if you have any questions or comments regarding your analytical report or service.

Thank you for your business. ENVision Laboratories looks forward to working with you on your next project.

Yours Sincerely,

Cheryl A. Crum

Cheryl A. Crum

Director of Project Management
ENVision Laboratories, Inc.

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ENVISION

Analytical Report

Client Name: MHE

Project ID: MHE POWDER COAT

Client Project Manager: JOSH RICHARDS / RAY KASSAB

ENVision Project Number: 2015-258

Analytical Method: EPA 6010
Prep Method: EPA 3010A

Client Sample ID: OUTFALL 001A
Envision Sample Number: 15-1918
Sample Matrix: water

Sample Collection Date/Time: 2/3/15 12:20
Sample Received Date/Time: 2/4/15 15:16

Compounds	Sample Results (ug/L)	Reporting Limit (ug/L)	Flags
Cadmium	< 5	5	
Chromium	< 10	10	
Copper	**940**	20	
Lead	< 50	10	
Nickel	**700**	50	
Silver	< 50	50	
Zinc	**77**	50	

ICP Analysis Date/Time: 2-8-15/11:12
Analyst Initials: gjd
Date Digested: 2/5/2015
Initial Sample Volume: 50 mL
Final Volume: 50 mL
Analytical Batch: 020615icp

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February 16, 2015

Mr. David Norris
ENVISION LABORATORIES, INC.
1439 Sandler Circle W. Drive
Indianapolis, IN 46239

Project ID: 2015-258
First Environmental File ID: 15-0527
Date Received: February 06, 2015

Dear Mr. David Norris:

The above referenced project was analyzed as directed on the enclosed chain of custody record.

All Quality Control criteria as outlined in the methods and current IL ELAP/NELAP have been met unless otherwise noted. QA/QC documentation and raw data will remain on file for future reference. Our accreditation number is 100292 and our current certificate is number 003469: effective 09/25/2014 through 02/28/2015.

I thank you for the opportunity to be of service to you and look forward to working with you again in the future. Should you have any questions regarding any of the enclosed analytical data or need additional information, please contact me at (630) 778-1200.

Sincerely,

Stan Zawolski
Project Manager

First Environmental Laboratories, Inc.
IL ELAP / NELAC Accreditation # 100292
1600 Shore Road • Naperville, Illinois 60563 • Phone (630) 778-1200 • Fax (630) 778-1233

Case Narrative

ENVISION LABORATORIES, INC.

Lab File ID: **15-0527**

Project ID: **2015-258**

Date Received: **February 06, 2015**

All quality control criteria, as outlined in the methods, have been met except as noted below or on the following analytical report.

The results in this report apply to the samples in the following table:

Laboratory Sample ID	Client Sample Identifier	Date/Time Collected
15-0527-001	15-1918 (Outfall 001A)	2/3/2015 12:20

Sample Batch Comments:

Sample acceptance criteria were met.

The following is a definition of flags that may be used in this report:

Flag	Description	Flag	Description
<	Analyte not detected at or above the reporting limit.	L	LCS recovery outside control limits.
C	Sample received in an improper container for this test.	M	MS recovery outside control limits; LCS acceptable.
D	Surrogates diluted out; recovery not available.	N	Analyte is not part of our NELAC accreditation.
E	Estimated result; concentration exceeds calibration range.	P	Chemical preservation pH adjusted in lab.
G	Surrogate recovery outside control limits.	Q	Result was determined by a GC/MS database search.
H	Analysis or extraction holding time exceeded.	S	Analysis was subcontracted to another laboratory.
J	Estimated result; concentration is less than routine RL but greater than MDL.	W	Reporting limit elevated due to sample matrix.
RL	Routine Reporting Limit (Lowest amount that can be detected when routine weights/volumes are used without dilution.)	ND	Analyte was not detected using a library search routine; No calibration standard was analyzed.

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Analytical Report

Client:	ENVISION LABORATORIES, INC.	**Date Collected:**	02/03/15
Project ID:	2015-258	**Time Collected:**	12:20
Sample ID:	15-1918 (Outfall 001A)	**Date Received:**	02/06/15
Sample No:	15-0527-001	**Date Reported:**	02/16/15

Analyte	Result	R.L.	Units	Flags
Cyanide, Total	**Method: 9010B/9014**			
Analysis Date: 02/13/15				
Cyanide, Total	0.372	0.005	mg/L	

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Quality Control Summary

Client: ENVISION LABORATORIES, INC. **Lab File ID:** 15-0527

Project ID: 2015-258 **Date Received:** 2/6/2015

QC Lab#	Time QC Code	Parameter	Reported Result	Units	QC Result	%R Limits Low	%R Limits High	RPD	RPD Limit
Parameter:	Cyanide, Total	**Analytical Method:**	9010B/9014		**Analytical WS #:** 126725	**Analysis Date:**			2/13/2015
15-0551-002MS	MS	Cyanide, Total	4.20	mg/kg	%R: 105	75	125		
15-0551-002MSD	MSD	Cyanide, Total	4.10	mg/kg	%R: 102.5	75	125	RPD: 2	20
CCB253211	CB	Cyanide, Total	< 0.005	mg/L	0	-			
CCB253212	CB	Cyanide, Total	< 0.005	mg/L	0	-			
CCVS253213	CCVS	Cyanide, Total	0.518	mg/L	%R: 103.6	90	110		
CCVS253214	CCVS	Cyanide, Total	0.526	mg/L	%R: 105.2	90	110		
LCS253215	LCS	Cyanide, Total	1.03	mg/L	%R: 103.3	80	120		
PB253218	PB	Cyanide, Total	< 0.005	mg/L	0	-			

* The QC indicator is outside control limits. %R = percent recovery; RPD = Relative percent difference
CB = Calibration Blank; CCVS = Continuing Calibration Verification Standard; MS = Matrix Spike;
MSD = Matrix Spike Duplicate; LCS = Laboratory Control Spike; SURR = Surrogate Spiking Compound;
PB = Procedure Blank; BLK = Method Blank

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EPA 6010B Metals Quality Control Data

ENVision Batch Number: 020615icp

Method Blank (MB):	MB Results(mg/L)	Rep Lim (mg/L)	Flag
Cadmium	< 0.005	0.005	
Chromium	< 0.01	0.01	
Copper	< 0.02	0.02	
Lead	< 0.01	0.01	
Nickel	< 0.05	0.05	
Silver	< 0.05	0.05	
Zinc	< 0.05	0.05	
Analysis Date/Time:	2-6-15/11:31		
Analyst Initials:	gjd		

Laboratory Control Standard (LCS):	LCS Results (mg/L)	LCS Conc.(mg/L)	% Rec	Flag
Cadmium	0.53	0.50	106%	
Chromium	0.52	0.50	104%	
Copper	0.56	0.50	112%	
Lead	0.54	0.50	108%	
Nickel	0.56	0.50	112%	
Silver	0.54	0.50	108%	
Zinc	0.56	0.50	112%	
Analysis Date/Time:	2-6-15/11:26			
Analyst Initials:	gjd			

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Flag Number	Comments

ENVision Proj#: 2015-258 Page _____ of _____

CHAIN OF CUSTODY RECORD

ENVision Laboratories, Inc. | 1439 Sadlier Circle West Drive | Indianapolis, IN 46239 | Phone: (317) 351-8632 | Fax: (317) 351-8639

Client: MHE Monthly	Invoice Address: Attn: Debbie 1800 Churchman Ave. 46203
Report Address: 1001 Hurricane Rd.	Project Name: MHE Powder Coat
Report To: Ray Kassab / Josh Richards	Lab Contact:
Phone: 317-788-7225	Sampled by: Colby Loney
Fax:	P.O. Number:
Desired TAT: (Please Circle One) 1-2 days 3-6 days Std (7 bus. days)	QA/QC Required: (circle if applicable) Level III Level IV

REQUESTED PARAMETERS

Sample Integrity:
Cooler Temp: 6 °C
(Circle)
Samples on Ice? Yes No
Samples Intact? Yes No
Custody Seal: Yes NO
ENVision provided bottles: Yes No
VOC vials free of head-space: Yes No N/A
pH checked? Yes No N/A
Method 5035 collection used? Yes No
5035 samples received within 48 hr of Collection? Yes No

Please indicate number of containers per preservative below

Sample ID	Coll. Date	Coll. Time	Comp (C) Grab (G)	Matrix	Total metals Cd, Cr(T), Cu, Pb, Ni, Ag, Zn	Cyanide (Total)						HCl	HNO_3	H_2SO_4	NaOH	Other	None	ENVision Sample ID
Outfall 001A	2/3/15	12:20	C	Water	X								X					15-1918 Sealed pH
Outfall 001A	2/3/15	12:24	G	Water		X									X			[illegible] 6.9

Comments: Field pH - Recalibrated 1/2/15 @ 8:15am

Relinquished by:	Date	Time	Received by:	Date	Time
[signature]	2/4/15	15:16	[signature]	2/4/15	15:16

ENVision Laboratories, Inc.
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Mr. Josh Richards
Material Handling Exchange, Inc.
1800 Churchman Ave
Indianapolis, IN 46203

June 17, 2015

ENVision Project Number: 2015-1433
Client Project Name: MHE Powder Coat

Dear Mr. Richards,

Please find the attached analytical report for the samples received June 5, 2015. All test methods performed were fully compliant with local, state, and federal EPA methods unless otherwise noted. The project was analyzed as requested on the enclosed chain of custody record. Please review the comments section for additional information about your results or Quality Control data.

Feel free to contact me if you have any questions or comments regarding your analytical report or service.

Thank you for your business. ENVision Laboratories looks forward to working with you on your next project.

Yours Sincerely,

Cheryl A. Crum

Cheryl A. Crum

Director of Project Management
ENVision Laboratories, Inc.

PA DEP Lab Code: 68-04846 NELAP Cert:004

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ENVISION

Analytical Report

Client Name: MHE

Project ID: MHE POWDER COAT

Client Project Manager: JOSH RICHARDS

ENVision Project Number: 2015-1433

Analytical Method: EPA 6010
Prep Method: EPA 3010A

Client Sample ID: OUTFALL 001
Envision Sample Number: 15-11094
Sample Matrix: water

Sample Collection Date/Time: 6/5/15 10:56
Sample Received Date/Time: 6/5/15 12:56

Compounds	Sample Results (ug/L)	Reporting Limit (ug/L)	Flags
Cadmium	< 5	5	
Chromium	< 10	10	
Copper	**3,600**	20	
Lead	**10**	10	
Nickel	**410**	50	
Silver	< 50	50	
Zinc	**100**	50	

ICP Analysis Date/Time: 6-9-15/11:26
Analyst Initials: gjd
Date Digested: 6/8/2015
Initial Sample Volume: 50 mL
Final Volume: 50 mL
Analytical Batch: 060915icp

First Environmental Laboratories, Inc.
IL ELAP / NELAC Accreditation # 100292
1600 Shore Road • Naperville, Illinois 60563 • Phone (630) 778-1200 • Fax (630) 778-1233

June 10, 2015

Ms. Cheryl Crum
ENVISION LABORATORIES, INC.
1439 Sandlier Cir. W. Drive
Indianapolis, IN 46239

Project ID: 2015-1433
First Environmental File ID: 15-2972
Date Received: June 09, 2015

Dear Ms. Cheryl Crum:

The above referenced project was analyzed as directed on the enclosed chain of custody record.

All Quality Control criteria as outlined in the methods and current IL ELAP/NELAP have been met unless otherwise noted. QA/QC documentation and raw data will remain on file for future reference. Our accreditation number is 100292 and our current certificate is number 003596: effective 03/24/2015 through 03/28/2016.

I thank you for the opportunity to be of service to you and look forward to working with you again in the future. Should you have any questions regarding any of the enclosed analytical data or need additional information, please contact me at (630) 778-1200.

Sincerely,

Neal Cleghorn
Project Manager

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Case Narrative

ENVISION LABORATORIES, INC.

Lab File ID: **15-2972**

Project ID: **2015-1433**

Date Received: **June 09, 2015**

All quality control criteria, as outlined in the methods, have been met except as noted below or on the following analytical report.

The results in this report apply to the samples in the following table:

Laboratory Sample ID	Client Sample Identifier	Date/Time Collected
15-2972-001	15-11094/Outfall 001A	06/05/15 10:59

Sample Batch Comments:

Sample acceptance criteria were met.

The following is a definition of flags that may be used in this report:

Flag	Description	Flag	Description
<	Analyte not detected at or above the reporting limit.	L	LCS recovery outside control limits.
C	Sample received in an improper container for this test.	M	MS recovery outside control limits; LCS acceptable.
D	Surrogates diluted out; recovery not available.	N	Analyte is not part of our NELAC accreditation.
E	Estimated result; concentration exceeds calibration range.	P	Chemical preservation pH adjusted in lab.
G	Surrogate recovery outside control limits.	Q	Result was determined by a GC/MS database search.
H	Analysis or extraction holding time exceeded.	S	Analysis was subcontracted to another laboratory.
J	Estimated result; concentration is less than routine RL but greater than MDL.	W	Reporting limit elevated due to sample matrix.
RL	Routine Reporting Limit (Lowest amount that can be detected when routine weights/volumes are used without dilution.)	ND	Analyte was not detected using a library search routine; No calibration standard was analyzed.

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Analytical Report

Client:	ENVISION LABORATORIES, INC.	**Date Collected:**	06/05/15
Project ID:	2015-1433	**Time Collected:**	10:59
Sample ID:	15-11094/Outfall 001A	**Date Received:**	06/09/15
Sample No:	15-2972-001	**Date Reported:**	06/10/15

Analyte	Result	R.L.	Units	Flags
Cyanide, Total **Method: 4500CN,C,E 1999**				
Analysis Date: 06/10/15				
Cyanide, Total	0.348	0.005	mg/L	

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Quality Control Summary

Client: ENVISION LABORATORIES, INC. **Lab File ID:** 15-2972

Project ID: 2015-1433 **Date Received:** 06/09/15

QC Lab#	Time QC Code	Parameter	Reported Result	Units	QC Result	%R Limits Low	%R Limits High	RPD Limit
Parameter:	Cyanide, Total	**Analytical Method:**	4500CN,C,E 1999	**Analytical WS #:**	131110	**Analysis Date:**	06/10/15	
15-2926-001MS	MS	Cyanide, Total	2.73	mg/L	%R: 62.2 *	75	125	
		MS outside control limits. All other QCIs are within acceptance limits.						
15-2926-001MSD	MSD	Cyanide, Total	2.83	mg/L	%R: 64.7 *	75	125	RPD: 4 20
		MSD outside control limits. All other QCIs are within acceptance limits.						
CCB277323	CB	Cyanide, Total	< 0.005	mg/L	0	-		
CCB277324	CB	Cyanide, Total	< 0.005	mg/L	0	-		
CCVS277325	CCVS	Cyanide, Total	0.480	mg/L	%R: 96	90	110	
CCVS277326	CCVS	Cyanide, Total	0.480	mg/L	%R: 96	90	110	
LCS277327	LCS	Cyanide, Total	0.960	mg/L	%R: 96	80	120	
PB277330	PB	Cyanide, Total	< 0.005	mg/L	0	-		

* The QC indicator is outside control limits. %R = percent recovery; RPD = Relative percent difference
CB = Calibration Blank; CCVS = Continuing Calibration Verification Standard; MS = Matrix Spike;
MSD = Matrix Spike Duplicate; LCS = Laboratory Control Spike; SURR = Surrogate Spiking Compound;
PB = Procedure Blank; BLK = Method Blank

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EPA 6010B Metals Quality Control Data

ENVision Batch Number: 060915icp

Method Blank (MB):	MB Results(mg/L)	Rep Lim (mg/L)	Flag
Cadmium	< 5	5	
Chromium	< 10	10	
Copper	< 20	20	
Lead	< 10	10	
Nickel	< 50	50	
Silver	< 50	50	
Zinc	< 50	50	
Analysis Date/Time:	6-9-15/09:21		
Analyst Initials:	gjd		

Laboratory Control Standard (LCS):	LCS Results (mg/L)	LCS Conc.(mg/L)	% Rec	Flag
Cadmium	0.49	0.50	98%	
Chromium	0.47	0.50	94%	
Copper	0.52	0.50	104%	
Lead	0.45	0.50	90%	
Nickel	0.48	0.50	96%	
Silver	0.44	0.50	88%	
Zinc	0.50	0.50	100%	
Analysis Date/Time:	6-9-15/09:14			
Analyst Initials:	gjd			

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Flag Number	Comments

ENVision Proj#: 2015-1433 Page ____ of ____

CHAIN OF CUSTODY RECORD

ENVision Laboratories, Inc. | 1439 Sadlier Circle West Drive | Indianapolis, IN 46239 | Phone: (317) 351-8632 | Fax: (317) 351-8639

Client: Kevin Lawrence/MHE	Invoice Address: Attn: Debbie 1855 Churchman Ave. 46203
Report Address: 1001 Hurricane Rd.	Project Name: MHE Powder Coat
Report To: Ray Kassab/Josh Richards	Lab Contact:
Phone:	Sampled by: Colby Long
Fax:	P.O. Number:
Desired TAT: (Please Circle One) 1-2 days 3-6 days Std (7 bus. days)	QA/QC Required: (circle if applicable) Level III Level IV

REQUESTED PARAMETERS

Metals / Cyanide / Total

Sample Integrity:
Cooler Temp: 6 °C (Circle)
Samples on Ice? Yes No
Samples Intact? Yes No
Custody Seal: Yes No
ENVision provided bottles: Yes No
VOC vials free of head-space: Yes No N/A
pH checked? Yes No N/A
Method 5035 collection used? Yes No
5035 samples received within 48 hr of Collection? Yes No

Please indicate number of containers per preservative below

Sample ID	Coll. Date	Coll. Time	Comp (C) Grab (G)	Matrix	HCl	HNO_3	H_2SO_4	NaOH	Other	None	ENVision Sample ID
											15-11094
Outfall 001A	6/5/15	10:56 AM	C	Water	X	X					Sealed PH
Outfall 001A	6/5/15	10:59 AM	G	Water	X			X			7.1

Comments: Field pH: 5/29/15 @ 3:00 - recalibrated

Relinquished by:	Date	Time	Received by:	Date	Time
	6/5/15	12:56		6/5/15	12:56

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Mr. Josh Richards
Material Handling Exchange, Inc.
1800 Churchman Ave
Indianapolis, IN 46203

October 8, 2015

ENVision Project Number: 2015-2526
Client Project Name: MHE Powder Coat

Dear Mr. Richards,

Please find the attached analytical report for the samples received October 1, 2015. All test methods performed were fully compliant with local, state, and federal EPA methods unless otherwise noted. The project was analyzed as requested on the enclosed chain of custody record. Please review the comments section for additional information about your results or Quality Control data.

Feel free to contact me if you have any questions or comments regarding your analytical report or service.

Thank you for your business. ENVision Laboratories looks forward to working with you on your next project.

Yours Sincerely,

Cheryl A. Crum

Cheryl A. Crum

Director of Project Management
ENVision Laboratories, Inc.

ENVision Laboratories, Inc.
1439 Sadlier Circle West Drive
Indianapolis, IN 46239
Tel: 317.351.8632
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ENVISION

Analytical Report

Client Name: MHE

Project ID: MHE POWDER COAT

Client Project Manager: JOSH RICHARDS

ENVision Project Number: 2015-2526

Analytical Method: EPA 6010
Prep Method: EPA 3010A

Client Sample ID: WASHER TANK 1
Envision Sample Number: 15-19613
Sample Matrix: water

Sample Collection Date/Time: 10/1/15 10:36
Sample Received Date/Time: 10/1/15 13:20

Compounds	Sample Results (mg/L)	Reporting Limit (mg/L)	Flags
Cadmium	< 0.005	0.005	
Chromium	< 0.01	0.01	
Copper	**3.4**	0.02	
Lead	< 0.01	0.01	
Nickel	**1.67**	0.05	
Silver	< 0.05	0.05	
Zinc	**0.43**	0.05	

ICP Analysis Date/Time: 10-1-15/17:18
Analyst Initials: gjd
Date Digested: 10/1/2015
Initial Sample Volume: 50 mL
Final Volume: 50 mL
Analytical Batch: 100115icp

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October 05, 2015

Mr. David Norris
ENVISION LABORATORIES, INC.
1439 Sandlier Circle W. Drive
Indianapolis, IN 46239

Project ID: 2015-2526
First Environmental File ID: 15-5246
Date Received: October 02, 2015

Dear Mr. David Norris:

The above referenced project was analyzed as directed on the enclosed chain of custody record.

All Quality Control criteria as outlined in the methods and current IL ELAP/NELAP have been met unless otherwise noted. QA/QC documentation and raw data will remain on file for future reference. Our accreditation number is 100292 and our current certificate is number 003596: effective 03/24/2015 through 03/28/2016.

I thank you for the opportunity to be of service to you and look forward to working with you again in the future. Should you have any questions regarding any of the enclosed analytical data or need additional information, please contact me at (630) 778-1200.

Sincerely,

Neal Cleghorn
Project Manager

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Case Narrative

ENVISION LABORATORIES, INC.

Lab File ID: **15-5246**

Project ID: **2015-2526**

Date Received: **October 02, 2015**

All quality control criteria, as outlined in the methods, have been met except as noted below or on the following analytical report.

The results in this report apply to the samples in the following table:

Laboratory Sample ID	Client Sample Identifier	Date/Time Collected
15-5246-001	15-19613/~~Outfall 001A~~WASHER TANK 1	10/01/15 10:28

Sample Batch Comments:

Sample acceptance criteria were met.

The following is a definition of flags that may be used in this report:

Flag	Description	Flag	Description
<	Analyte not detected at or above the reporting limit.	L	LCS recovery outside control limits.
C	Sample received in an improper container for this test.	M	MS recovery outside control limits; LCS acceptable.
D	Surrogates diluted out; recovery not available.	N	Analyte is not part of our NELAC accreditation.
E	Estimated result; concentration exceeds calibration range.	P	Chemical preservation pH adjusted in lab.
G	Surrogate recovery outside control limits.	Q	Result was determined by a GC/MS database search.
H	Analysis or extraction holding time exceeded.	S	Analysis was subcontracted to another laboratory.
J	Estimated result; concentration is less than routine RL but greater than MDL.	W	Reporting limit elevated due to sample matrix.
RL	Routine Reporting Limit (Lowest amount that can be detected when routine weights/volumes are used without dilution.)	ND	Analyte was not detected using a library search routine; No calibration standard was analyzed.

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Analytical Report

Client:	ENVISION LABORATORIES, INC.	**Date Collected:**	10/01/15
Project ID:	2015-2526	**Time Collected:**	10:28
Sample ID:	15-19613/~~Outfall 001A~~ WASHER TANK 1	**Date Received:**	10/02/15
Sample No:	15-5246-001	**Date Reported:**	10/05/15

Analyte	Result	R.L.	Units	Flags
Cyanide, Total **Method: 4500CN,C,E 1999**				
Analysis Date: 10/05/15				
Cyanide, Total	0.434	0.005	mg/L	

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Quality Control Summary

Client: ENVISION LABORATORIES, INC. **Lab File ID:** 15-5246

Project ID: 2015-2526 **Date Received:** 10/02/15

QC Lab#	Time QC Code	Parameter	Reported Result	Units	QC Result	%R Limits Low	%R Limits High	RPD Limit
Parameter: Cyanide, Total		**Analytical Method:** 4500CN,C,E 1999	**Analytical WS #:** 135071		**Analysis Date:** 10/05/15			
15-5250-003MS	MS	Cyanide, Total	3.94	mg/kg	%R: 98.5	75	125	
15-5250-003MSD	MSD	Cyanide, Total	2.97	mg/kg	%R: 74.3 *	75	125	RPD: 28 * 20
		MSD outside control limits. All other QCIs are within acceptance limits.						
CCB296615	CB	Cyanide, Total	< 0.005	mg/L	0	-		
CCB296616	CB	Cyanide, Total	< 0.005	mg/L	0	-		
CCVS296617	CCVS	Cyanide, Total	0.510	mg/L	%R: 101.9	90	110	
CCVS296618	CCVS	Cyanide, Total	0.516	mg/L	%R: 103.3	90	110	
LCS296619	LCS	Cyanide, Total	1.00	mg/L	%R: 100.5	80	120	
PB296622	PB	Cyanide, Total	< 0.005	mg/L	0	-		

* The QC Indicator is outside control limits. %R = percent recovery; RPD = Relative percent difference
CB = Calibration Blank; CCVS = Continuing Calibration Verification Standard; MS = Matrix Spike;
MSD = Matrix Spike Duplicate; LCS = Laboratory Control Spike; SURR = Surrogate Spiking Compound;
PB = Procedure Blank; BLK = Method Blank

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.

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:
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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:

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: Gary Sells		Date: 12/12/16	
Facility name: Material Handling Exchange			
Facility address: 1001 Hurricane Street			
Facility city: Franklin	Facility state: Indiana	ZIP code: 46131	

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

PRETREATMENT PERMIT BRIEFING MEMO

Material Handling Exchange
1001 Hurricane Street
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 continuously. The average production projection for the facility for the remainder of 2016 and 2017 is 180,000 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 200 to 8,000 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 is installed prior to the discharge point.

Water samples are 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 are 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: environmentally-friendly iron phosphate cleaner/coater: Concentration range 3 – 4% by volume. Additives may be used to raise and lower the pH prior to discharge.

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. 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.