



INP000627  
Johnson Co

Larry Reynolds  
Senior Project Manager / Certified Operator  
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February 7, 2019

Bridget S. Murphy  
Inspections Section Chief  
Compliance Branch  
Office of Water Quality  
100 N. Senate Avenue  
Indianapolis, IN 46204

Sent via email to: [wwViolationResponse@idem.IN.gov](mailto:wwViolationResponse@idem.IN.gov)

Ref: Material Handling Exchange, Inc.  
NPDES Permit # INP000627  
Franklin, Johnson County

Dear Ms. Murphy,

The following is intended to serve as a response to the notice of violation received on 1-8-2019 by Mr. Will Mains, Operations Manager of Materials Handling Exchange, Inc. (MHE). SES Environmental (SES) is herein responding on behalf of MHE, to address the violation identified in the initial notice and inspection report.

SES Environmental has provided the services of a Certified Industrial Wastewater Operator to the MHE facility since 2013. Throughout this service period, SES services included operational consulting and oversight, certifying DMR's, permit modifications, and operational troubleshooting. The need for operational oversight has lessened over time since the only active treatment in the past was pH adjustment. Throughout this duration of time, Mr. Raymond Kassab (WW019266 – Class D), has served as the facility certified operator. The involvement that Mr. Kassab has had over the last six years has varied depending on the needs from the facility, therefore, Mr. Kassab's involvement with the facility has changed over the years.

Recently, Mr. Kassab initiated discussion and correspondence with IDEM to modify the permit for this facility on order to reflect the changes in treatment requirements. Before discussing his correspondence, we would like to provide some background on the current operations.

The permit for MHE states that the facility "may" adjust pH prior to discharge; however, the pH adjustment process for MHE has not been used for a considerable period of time. In correspondence with IDEM, Mr. Kassab indicated that since the permit issuance on January 20, 2017, MHE has not had to perform any pH adjustment and requested that the permit be amended to remove the requirement of having a certified operator. MHE is still considered a regulated industrial discharger under 40 CFR 433 and has continued to complete the mandated sampling and reporting. Mr. Kassab was then advised to submit a signed permit modification request along with the \$50 application fee to change the operator classification for the permit. A letter including the





***Material Handling Exchange, Inc. NOV Response***

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rationale for the modification and an updated flow diagram was also requested from Nicole Gardner of IDEM.

The intent of this letter is to address the violation cited by IDEM which stated that the former certified operator was not on-site, however, SES wanted to discuss the fact that Mr. Kassab did maintain management of the wastewater facility through other methods. The former operator rationale for limiting the number of operator visits was based on the lack of the need for treatment at this facility. Other operational functions such as monitoring, calibration of equipment and on-site field measurements were tracked by the former operator during monthly review of the monthly operational logs and test results. The operator did maintain all monthly reporting and recordkeeping as well as the submission of all required monthly reports in accordance with the permit requirements.

The operation of the washer system process is maintained by on-site MHE personnel. Mr. Chris Miller of MHE attends to process control needs daily. One of the specific duties that Mr. Miller provides is to precisely control chemical usage in the washer system. Mr. Miller is responsible for monitoring and adjusting chemical feed to the washer process. Mr. Miller has a rigorous daily routine consisting of onsite testing, flow measurement, calibration, monitoring, sampling and recordkeeping. MHE keeps the washer process in control within the guidelines of the chemical supplier and in order to ensure compliance with the discharge permit, however, these steps are all part of the washer process rather than wastewater treatment. Mr. Miller retains records of all daily activities and adjustments to the process control. Mr. Miller is also responsible for sampling and onsite analysis of the discharge, as well as all steps to properly maintain good operational control.

The discharge from the system occurs in two chambers where the washer system water overflows from the system into the discharge pit. Only passive settling is accomplished with this last step rather than active treatment. The application of cleaning chemicals utilized in the washer system has been adjusted so that pH neutralization is not an additional treatment step for wastewater being discharged. With this adjustment to the washer system, the pH has remained within permit limits for monthly discharge; therefore, the pH adjustment of the discharge is no longer necessary.

Mr. Kassab has since terminated his employment with SES, for reasons unrelated to this issue and the current SES operator was not made aware of the discussions with IDEM until January 2019. The current operator, Mr. Larry Reynolds (WW17265 – Class C) visited the MHE facility on January 21, 2019 as part of his monthly operational inspections to satisfy his operator duties for MHE. At this time, SES would like to notify IDEM of the change in operator status from Mr. Raymond Kassab (WW019266) to Mr. Larry Reynolds (WW17265) for Materials Handling Exchange (NPDES Permit #INP000627).

The anticipated inspection and visitation schedule that will be maintained by Mr. Reynolds will be monthly inspections, until such time as a request for a permit modification is submitted and approved. Additionally, MHE has at least two representatives within their operating staff, who have begun preparing to apply for an industrial wastewater operators' license. This will allow MHE to maintain a full time operator at the site on an on-going basis. We trust that these actions provide an adequate response to this noncompliance condition. We are available to discuss this





***Material Handling Exchange, Inc. NOV Response***

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further and will provide additional feed-back as necessary. Please do not hesitate to contact the undersigned if you have further questions.

Sincerely,  
**SES Environmental**

A handwritten signature in black ink that reads "Larry Reynolds". The signature is written in a cursive, flowing style.

Larry Reynolds  
Senior Project Manager  
Certified Operator

A handwritten signature in black ink that reads "Lauren Rutherford". The signature is written in a cursive, flowing style.

Lauren Rutherford  
Project Manager

CC: MHE – Will Mains  
MHE – Sarah McKee  
Enclosures: Larry Reynolds Certified Operator Certificate



Department of Environmental Management  
Office of Water Quality - IGCN Room 1255  
100 N. Senate Ave.  
Indianapolis, Indiana 46204-2251

## Wastewater Operator Class C

Certification Number	Effective Date
WW017265	07/01/2017

*Larry G. Reynolds*

### Certificate of Competency

This certifies that the person named above has fulfilled the requirements for certification as a wastewater treatment plant operator in accordance with IC 13-18-11 and is hereby certified as a Wastewater Operator Class C.

*Bruno L. Pigott*

Bruno L. Pigott  
Commissioner

STATE FORM 49122 (9-98)

Department of Environmental Management  
Office of Water Quality - IGCN Room 1255  
100 N. Senate Ave.  
Indianapolis, IN 46204-2251

## Wastewater Operator Class C

Certification#	Effective Date	Expiration Date
WW017265	07/01/2017	06/30/2019

*Larry G. Reynolds*

STATE FORM 49122 (9-98)