



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

Brian Rockensuess
Commissioner

October 19, 2022

Via Email to: jamato@m-h-e.com
Mr. Joseph Amato, Operations Manager
Material Handling Exchange Inc.
1001 Hurricane Street
Franklin, Indiana 46131

Dear Mr. Amato:

Re: Inspection Summary Letter
Material Handling Exchange Incorporated
NPDES Permit No. INP000627
Franklin, Johnson County

An inspection of the above-referenced facility or location was conducted by a representative of the Indiana Department of Environmental Management, Office of Water Quality, pursuant to IC 13-18-3-9. A summary of the inspection is provided below:

Date(s) of Inspection: October 17, 2022
Type of Inspection: Compliance Evaluation Inspection
Inspection Results: Potential problems were discovered or observed.

A copy of the NPDES Industrial Facility Inspection Report is enclosed for your records. Please direct any response to this letter and any questions to Kevin Stark at 812-525-9411 or by email to kstark@idem.in.gov.

Sincerely,

Kim Rohr, Chief
Wastewater Inspection Section
Office of Water Quality

Enclosure



NPDES Industrial Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: INP000627		Facility Type: Industrial Minor		Facility Classification: A-SO		TEMPO AI ID 29583	
Date(s) of Inspection:		October 17, 2022					
Type of Inspection:		Compliance Evaluation Inspection					
Name and Location of Facility Inspected: Material Handling Exchange Incorporated 1001 Hurricane St Franklin IN 46131 County: Johnson				Receiving Waters/POTW: Franklin POTW		Permit Expiration Date: 2/28/2027	
						Design Flow: NA	
On Site Representative(s): First Name Last Name Title Email Phone Joseph Amato Operations Manager jamato@m-h-e.com 317-361-6434 Jeremy Baughman Maintenance Specialist hsstool@m-h-e.com 317-213-0178 Was a verbal summary of the inspection given to the on-site rep? Yes							
Certified Operator: NA		Number:	Class:	Effective Date:	Expiration Date:	Email:	
Cyber Security Contact Name: N/A Email:							
Responsible Official: Mr. Joseph Amato, Operations Manager 1001 Hurricane Street Franklin, Indiana 46131				Permittee: Material Handling Exchange Inc. Email: jamato@m-h-e.com Phone: 317-361-6434 Fax:			
						Contacted? Yes	
INSPECTION FINDINGS							
<input type="radio"/> Conditions evaluated were found to be satisfactory at the time of the inspection. (5) <input type="radio"/> Violations were discovered but corrected during the inspection. (4) <input checked="" type="radio"/> Potential problems were discovered or observed. (3) <input type="radio"/> Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2) <input type="radio"/> Violations were discovered and may subject you to an appropriate enforcement response. (1)							
AREAS EVALUATED DURING INSPECTION (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)							
N	Receiving Waters	S	Facility/Site	S	Self-Monitoring	N	Compliance Schedules
S	Effluent/Discharge	N	Operation	S	Flow Measurement		
S	Permit	N	Maintenance	S	Laboratory	M	Effluent Limits Compliance
		N	Sludge	S	Records/Reports	N	Other:
DETAILED AREA EVALUATIONS							
Receiving Waters: N 1. The receiving stream was visibly free of excessive deposits of settled solids, floating debris, oil, scum, or billowy foam. Comments: The facility discharges to the Franklin POTW.							
Effluent/Discharge: N 1. Final effluent was essentially free of excessive solids, floating debris, oil, scum, or billowy foam. S 2. Pretreatment discharge into sanitary sewers appeared free of excessive oils, grease, solids, or foam and did not appear to be in violation of the local Sewer Use Ordinance. S 3. Pretreatment discharge into sanitary sewers did not contain materials that pass through or interfere with the operation of the POTW. Comments: The pretreatment discharge was clear and free of excessive solids, floating debris, oil, scum, and foam.							

Permit:

- S 1. Did the facility have a copy of the current permit available for reference.
- N 2. If the permit expires within 180 days, has a renewal application been submitted?
- S 3. Receiving waters are accurately described in the permit.
- N 4. The permit has been properly transferred if there is a new owner.

Comments:

The facility has a valid permit.

Facility/Site:

- N 1. The facility was found to have standby power or equivalent provision, If required.
- N 2. An adequate alarm or notification system for power or equipment failure was available for the treatment facility.
- S 3. Safe and adequate access was provided for inspection of all treatment units and outfalls.
- S 4. Facilities and equipment did not appear beyond their useful life.
- 5. List any safety concerns noted during the inspection in the box below:

Comments:

The facility grounds are well maintained. Safe access was provided for the inspection.

Operation:

- N 1. All facilities and systems necessary for achieving compliance with the terms and conditions of the permit were operated efficiently, including an anticipated bypass report for steps of treatment taken out of service.
- N 2. An adequate, qualified operating staff was found to be provided to carry out the operation of the facility, including:
 - a. Certified Operator's on-site attendance and/or qualified operations personnel attendance was adequate.
 - b. Adequate documentation of operational activities, including system monitoring and cleaning.
 - c. Adequate funding to ensure proper operation.
- N 3. Solids handling procedures were adequate.
- N 4. Documentation of solids removal, handling, and disposal was adequate.

Comments:

The facility is not currently utilizing a treatment system. No solids are produced.

Maintenance:

- N 1. A maintenance record system has been established and includes maintenance/repair history and preventative maintenance plan.
- N 2. Facility maintenance activities appeared adequate.

Comments:

There is no equipment to maintain.

Sludge:

- N 1. Sludges, screenings, and slurries were found to be handled and disposed of properly.

Comments:

No sludge is produced.

Self-Monitoring:

- S 1. Samples were found to be taken at pre-designated locations and were found to be representative.
- S 2. Flow-proportioned samples were found to be obtained where needed.
- S 3. The facility was found to conduct sampling of all waste streams, including type and frequency, as required in the permit.
- S 4. Sample collection procedures, including automatic sampling, include:
 - a. Samples refrigerated during compositing.
 - b. Proper preservation techniques used.
 - c. Containers and holding times conform to 40 CFR 136.3.
- S 5. Sample documentation was adequate and includes:
 - a. Dates, times, and locations of sampling.
 - b. Name of individual performing sampling.
 - c. Instantaneous flow for flow-weighted aliquots.
 - d. Chain of Custody records.
- S 6. NPDES Permit Total Toxic Organic (TTO) requirements were being met.
- N 7. NPDES Permit Whole Effluent Toxicity (WET) testing requirements were being met.

Comments:

The Self Monitoring Program was rated as satisfactory. All sampling practices are conducted accurately and at the frequency required by the permit.

Flow Measurement:

- S 1. Flow was found to be properly monitored as required by the permit.
- S 2. Flow data and calibration records were available for review, and document that monitoring equipment has been calibrated at the frequency required in the permit.

Comments:

The effluent flow meter was last calibrated by Indiana Standards Lab on January 12, 2022.

Laboratory:

The following laboratory records were reviewed:

pH Bench Sheets pH calibration log Contract Lab Reports

Chain-of-Custody

- N 1. The laboratory practices and protocol reviewed were adequate, including:
- a. A written laboratory QA/QC manual was available.
 - b. Samples were found to be properly stored.
 - c. Approved analytical methods were used.
 - d. Calibration and maintenance of instruments was adequate.
 - e. QA/QC procedures were adequate.
 - f. Dates of analyses (and times, where required) were recorded.
 - g. Name of person performing analyses was recorded.

- S 2. Review of lab records and/or on-site field testing equipment and protocols was found to be adequate.

Contract Lab Information

Water and Wastewater Laboratories Inc. Cleveland, OH

Comments:

The pH bench sheets and calibration logs reviewed during the inspection appeared to be accurate and complete. Analysis of pH is conducted on site. All other parameter analyses are conducted at the contract lab.

Records/Reports:

The following records/reports were reviewed:

DMRs for the period of October 2021 to September 2022 were reviewed as part of the inspection.

- S 1. All facility records for the period including the previous three years were available for review.
- S 2. DMRs and MMRs were completed properly and accurately including:
- a. "No Ex" column was accurate.
 - b. Signatory requirements were met.
 - c. Reports were prepared by or under the direction of a certified operator.
- S 3. Bypass and Noncompliance reporting are adequate.

Comments:

The requested records were available and appear complete and accurate.

Compliance Schedules:

- N 1. The NPDES Permit Schedule of Compliance monitoring and reporting milestones have been met.
- N 2. Agreed Order compliance milestones have been met.

Comments:

There is no Schedule of Compliance in the current permit, and there is no Agreed Order.

Effluent Limits Compliance:

Yes 1. Were DMRs reviewed as part of the inspection?

DMRs for the period of October 2021 to September 2022 were reviewed as part of the inspection.

Yes 2. Were violations noted during the review of DMRs?

The Effluent Limits Compliance area was rated marginal due to the following self-reported violations of the limits detailed in Part I. A. of the NPDES Permit:

Month	Year	Outfall	Parameter	Number
August	2022	001	Total Cyanide	2
July	2022	001	Total Cyanide	2
March	2022	001	Total Cyanide	2

Comments:

The facility self reported six cyanide violations within the last twelve months.

Based on meetings between IDEM and the City of Franklin, the City has indicated that Sewer Use Ordinance limits will be reevaluated in the near future.

IDEM REPRESENTATIVE

Inspector Name:

Kevin Stark

Email:

kstark@idem.in.gov

Phone Number:

812-525-9411

Other staff participating in the inspection:

Name(s)

Alyssa Ruthkay

Phone Number(s)

219-252-0907

IDEM MANAGER REVIEW

IDEM Manager:

Becky Ruark

Date:

10/18/2022