October 17, 2019

VIA ELECTRONIC MAIL

Mr. Ben McKnight, EHS Director
Electro-Spec Inc.
1800 Commerce Parkway
Franklin, IN 46131

Dear Mr. McKnight:

Re: IWP Permit No. INP000606
Permit Modification
Electro-Spec Inc.
Franklin, IN – Johnson County

Your request for a permit modification has been reviewed and processed in accordance with rules adopted under 327 IAC 5. Enclosed is a copy of the draft permit modification. An accompanying Briefing Memo itemizes and explains the rationale for the revisions.

Pursuant to IC 13-15-5-1, IDEM will publish a general notice in the newspaper with the largest general circulation within the above county. A 30-day comment period is available in order to solicit input from interested parties, including the general public.

Please review this draft permit modification and associated documents carefully to become familiar with the proposed terms and conditions. Comments concerning the draft permit modification should be submitted in accordance with the procedure outlined in the enclosed public notice form. We suggest that you meet with us to discuss major concerns or objections you may have with the draft permit modification.

Questions concerning this draft permit modification may be addressed to Jennifer Carlino of my staff, at 317/232-8702 or Jcarlino@idem.in.gov.

Sincerely,

Nikki Gardner, Chief
Industrial NPDES Permits Section
Office of Water Quality
Enclosures

cc:  Johnson County Health Department
     Missy Nunnery, IDEM Inspector
     City of Franklin POTW
STATE OF INDIANA

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AMENDED 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, Electro-Spec Inc. (hereinafter referred to as the permittee) is authorized to discharge, from the facility located at 1800 Commerce Parkway in Franklin, Indiana, 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.

The permit, as issued on July 8, 2016, and subsequently modified on September 1, 2018, is hereby amended, as contained herein. The amended provisions shall become effective ______________. All terms and conditions of the permit not modified at this time remain in effect. Further, any existing condition or term affected by the amendments will remain in effect until the amended provisions become effective. This permit and the authorization to discharge, as amended, shall expire at midnight December 31, 2021.

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

Signed on ___________________ for the Indiana Department of Environmental Management.

_________________________________________________________________

Jerry Dittmer, Chief
Permits Branch
Office of Water Quality
### PART I

#### (A) EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

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

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Daily Maximum</th>
<th>Monthly Average</th>
<th>Unit</th>
<th>Measurement Frequency</th>
<th>Sample Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copper [Cu]</td>
<td>3.38</td>
<td>2.07 mg/l</td>
<td>1 X Month</td>
<td>24 Hr. Comp.</td>
<td></td>
</tr>
<tr>
<td>Lead [Pb]</td>
<td>0.69</td>
<td>0.43 mg/l</td>
<td>Semi-Annually</td>
<td>24 Hr. Comp.</td>
<td></td>
</tr>
<tr>
<td>Nickel [Ni]</td>
<td>3.98</td>
<td>2.38 mg/l</td>
<td>1 X Month</td>
<td>24 Hr. Comp.</td>
<td></td>
</tr>
<tr>
<td>Silver [Ag]</td>
<td>0.43</td>
<td>0.24 mg/l</td>
<td>Semi-Annually</td>
<td>24 Hr. Comp.</td>
<td></td>
</tr>
<tr>
<td>Total Cyanide [CN(T)] [8]</td>
<td>1.20</td>
<td>0.65 mg/l</td>
<td>Semi-Annually</td>
<td>Grab</td>
<td></td>
</tr>
<tr>
<td>Cadmium [Cd]</td>
<td>0.11</td>
<td>0.07 mg/l</td>
<td>Semi-Annually</td>
<td>24 Hr. Comp.</td>
<td></td>
</tr>
<tr>
<td>Total Chromium [Cr(T)]</td>
<td>2.77</td>
<td>1.71 mg/l</td>
<td>Semi-Annually</td>
<td>24 Hr. Comp.</td>
<td></td>
</tr>
<tr>
<td>Zinc [Zn]</td>
<td>2.61</td>
<td>1.48 mg/l</td>
<td>Semi-Annually</td>
<td>24 Hr. Comp.</td>
<td></td>
</tr>
<tr>
<td>TTO [9]</td>
<td>2.13</td>
<td>----- mg/l</td>
<td>Semi-Annually</td>
<td>Grab</td>
<td></td>
</tr>
</tbody>
</table>

#### Table 1

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Daily Minimum</th>
<th>Daily Maximum</th>
<th>Unit</th>
<th>Measurement Frequency</th>
<th>Sample Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>pH [7]</td>
<td>5.0</td>
<td>10.0</td>
<td>s.u.</td>
<td>Daily</td>
<td>Grab</td>
</tr>
</tbody>
</table>

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

[4] Parameters that are to be monitored twice per year shall be reported during the months of June and December. If, however, two other months are more appropriate, the permittee may request to report in two alternate months, or the State may require the permittee to report during two alternate months.

In situations of intermittent or batch discharge, all parameters required to be monitored should be sampled during the first representative discharge occurring...
during the monitoring period and then reported on the appropriate state and federal forms at the end of the monitoring period.

If a representative discharge occurs at any time during the monitoring period as identified for that individual parameter, then it is a violation of this permit to not collect a sample and report those results. At the first opportunity that a representative discharge occurs during the monitoring period, it should be sampled for all the required parameters during that monitoring period. Waiting to collect a sample until the end of a monitoring period risks missing a representative sample collection opportunity, and it is considered a violation of this permit to not collect a sample, analyze and report those results, when there was a discharge for that monitoring period.

[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 every twelve (12) months.


[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.

[10] In accordance with 327 IAC 18-2, as a member of the ESP or CLEAN program, the permittee has been approved to submit DMRs on an annual basis. The permittee shall submit each monthly electronic DMR no later than the 28th day of the first month of the following year. If membership is not renewed, the permittee shall submit monitoring reports electronically to IDEM containing results obtained during the previous month, no later than the 28th day of the month following each completed monitoring period. Furthermore, the submission of MMRs is not necessary while the facility is a member of ESP or CLEAN and the receiving POTW and IDEM inspections concur that this ESP member is compliant with NPDES limitations.
National Pollutant Discharge Elimination System
Briefing Memo for
Electro-Spec Inc.
Draft modification: October 2019

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: Electro-Spec Inc.
1800 Commerce Parkway
Franklin, IN 46131

Existing Permit Information:
Permit Number: INP000606
Expiration Date: December 31, 2021

Facility Contact: Ben McKnight, EHS Director
(317) 738-9199 bmcknight@electro-spec.com

Facility Location: 1800 Commerce Parkway
Franklin, IN 46131
Johnson County

Receiving POTW: City of Franklin, POTW
NPDES Permit # IN0021181

Proposed Permit Action: Modify

Source Category: Industrial Pretreatment

Permit Writer: Jennifer Carlino
(317) 232-8702 Jcarlino@idem.in.gov
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1.0 INTRODUCTION

The Indiana Department of Environmental Management (IDEM) received a request from Electro-Spec Inc. on September 18, 2019 to modify National Pollutant Discharge Elimination System (NPDES) Permit INP000606. The current five year permit was issued with an effective date of January 1, 2017 in accordance with 327 IAC 5-2-6(a).

In accordance with Title 40 of the Code of Federal Regulations (CFR) Sections 124.7 and 124.56, as well as Indiana Administrative Code (IAC) 327 Article 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 identifies the basis for this modification to the permit and the modified pages of the permit issued on July 8, 2016 and modified on September 1, 2018.

2.0 PERMIT MODIFICATION

2.1 Modification Request

As a member of the ESP program, this gives Electro-Spec options to request permit modifications if IDEM finds the modification possible. Electro-Spec holds a wastewater pretreatment permit INP000606 and the final effluent goes to the Franklin POTW. Electro-Spec's current permit requires monthly testing of copper, nickel, lead and silver. Electro-Spec would like to have the testing for Lead and Silver moved from monthly to semi-annually.

2.2 IDEM's Proposed Modification

Based on the previous two years of data submitted by Electro-Spec Inc., that shows the sampling results for Lead and Silver are well below the current permit limits, IDEM proposes to reduce the monitoring frequency for these two parameters from monthly to semi-annually.

3.0 Permit Processing/Public Comment

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

PRETREATMENT – MODIFICATION

ELECTRO-SPEC INC., Permit No. INP000606, JOHNSON COUNTY, 1800 Commerce Parkway Franklin, IN. This modification request is to reduce the lead and silver from monthly to semi-annually; part of the ESP program. Permit Manager: Jennifer Carlino, 317/232-8702, jcarlino@idem.IN.gov. Published in the Daily Journal.

PROCEDURES TO FILE A RESPONSE

Draft can be viewed or copied (10¢ per page) at IDEM/OWQ NPDES PS, 100 North Senate Avenue, (Rm 1203) Indianapolis, IN, 46204 (east end elevators) from 9 – 4, Mon - Fri, (except state holidays). A copy of the Draft Permit is on file at the local County Health Department. Please tell others you think would be interested in this matter. For your rights & responsibilities see: Public Participation Guide: http://www.in.gov/idem/5474.htm or Citizens’ Guide to IDEM: https://www.in.gov/idem/6900.htm.

Response Comments: The proposed decision to issue a permit is tentative. Interested persons are invited to submit written comments on the Draft permit. All comments must be postmarked no later than the Response Date noted to be considered in the decision to issue a Final permit. Deliver or mail all requests or comments to the attention of the Permit Writer at the above address, (mail code 65-42 PS).

To Request a Public Hearing:

Any person may request a Public Hearing. A written request must be submitted to the above address on or before the Response Date noted. The written request shall include: the name and address of the person making the request, the interest of the person making the request, persons represented by the person making the request, the reason for the request and the issues proposed for consideration at the Hearing. IDEM will determine whether to hold a Public Hearing based on the comments and the rationale for the request. Public Notice of such a Hearing will be published in at least one newspaper in the geographical area of the discharge and sent to anyone submitting written comments and/or making such request and whose name is on the mailing list at least 30 days prior to the Hearing.