December 28, 2019

VIA ELECTRONIC MAIL

Mr. Maxwell Fall, President/CEO
General Devices Co., Inc.
P.O. Box 39100
Indianapolis, IN 46239

Dear Mr. Fall:

Re: NPDES Permit No. IN0062626
Draft Permit Modification
General Devices Co., Inc.
Indianapolis, IN, Marion 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. 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 Trisha Williams of my staff, at 317/234-8210 or twilliam@idem.in.gov.

Sincerely,

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

Enclosures

cc: Marion County Health Department
Justin Maxwell, Delta Chemicals & Equipment
Donald Hunt, General Devices Co., Inc.
Andy Schmidt, IDEM
STATE OF INDIANA

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

AMENDED AUTHORIZATION TO DISCHARGE UNDER THE

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et seq., the "Act"), and IDEM's permitting authority under IC 13-15, 

GENERAL DEVICES CO., INC.

is authorized to discharge from a machining and fabricating facility that is located at 1410 South Post Road, Indianapolis, Indiana to receiving waters identified as Henry Kock Ditch in accordance with effluent limitations, monitoring requirements, and other conditions set forth in Parts I and II hereof.

The permit, as issued on October 21, 2016, is hereby amended. 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 may be revoked for the nonpayment of applicable fees in accordance with IC 13-18-20.

This permit and the authorization to discharge, as amended, shall expire at midnight November 30, 2021. In order to receive authorization to discharge beyond the date of expiration, the permittee shall submit such information and forms as are required by the Indiana Department of Environmental Management no later than 180 days prior to the date of expiration.

Issued on ____________________________________ for the Indiana Department of Environmental Management.

________________________
Jerry Dittmer, Chief
Permits Branch
Office of Water Quality
| Permittee: | General Devices Co., Inc.  
P.O. Box 39100  
Indianapolis, IN 46239 |
|---|---|
| **Existing Permit Information:** | Permit Number: IN0062626  
Expiration Date: November 30, 2021 |
| **Facility Contact:** | Donald Hunt, Director  
(317) 715-7000, donhunt@generaldevices.com |
| **Facility Location:** | 1410 South Post Road  
Indianapolis, IN 46239  
Marion County |
| **Receiving Stream:** | Henry Kock Ditch |
| **GLI/Non-GLI:** | Non-GLI |
| **Proposed Permit Action:** | Modify |
| **Date Application Received:** | November 26, 2019 |
| **Source Category** | NPDES Minor – Industrial |
| **Permit Writer:** | Trisha Williams  
(317) 234-8210, twilliam@idem.in.gov |
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1.0 INTRODUCTION

The Indiana Department of Environmental Management (IDEM) received a request from General Devices Co., Inc. on November 26, 2019, to modify National Pollutant Discharge Elimination System (NPDES) Permit IN0062626. The current five year permit was issued with an effective date of December 1, 2016 in accordance with 327 IAC 5-2-6(a).

The Federal Water Pollution Control Act (more commonly known as the Clean Water Act), as amended, (Title 33 of the United States Code (U.S.C.) Section 1251 et seq.), requires an NPDES permit for the discharge of pollutants into surface waters. Furthermore, Indiana law 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 and implements these federal and state requirements.

In accordance with Title 40 of the Code of Federal Regulations (CFR) Section 124.7, as well as Title 327 of the Indiana Administrative Code (IAC) 327 Article 5-3-7, a Statement of Basis, or Briefing Memo, is required for certain NPDES permits. This document fulfills the requirements established in these regulations. This Briefing Memo was prepared in order to document the factors considered in the development of NPDES Permit effluent limitations. The technical basis for the Briefing Memo may consist of evaluations of promulgated effluent guidelines, existing effluent quality, receiving water conditions, Indiana water quality standards-based wasteload allocations, and other information available to IDEM. Decisions to award variances to Water Quality Standards or promulgated effluent guidelines are justified in the Briefing Memo where necessary. This Briefing Memo also identifies the modified pages of the permit as issued on October 21, 2016.

2.0 FACILITY DESCRIPTION

2.1 General

General Devices Company, Inc. is classified under Standard Industrial Classification (SIC) Code 3469 – Metal Stampings, not elsewhere classified, 3999 – Miscellaneous Metal Manufacturing and 3444 – Sheet Metal Work. General Devices Company, Inc. manufactures cases, shelving, and other hardware for electronic devices. Operations consist of machining and coating. Additional operations include maintenance, chemical storage, and other support activities. All plant processes are covered under 40 CFR 433, Metal Finishing Point Source Category.

A map showing the location of the facility has been included as Figure 1.
Figure 1: Facility Location/Site Map

General Devices Co., Inc.
1410 South Post Road
Indianapolis, IN 46239
Marion County
2.2 Outfall Locations

Outfall 002
Latitude:  39º 45’ 00”
Longitude:  -86º 00’ 54”

3.0 PERMIT MODIFICATION

3.1 Modification Request

General Devices Co., Inc. has submitted a request for a permit modification to convert the paint pretreatment process from an iron phosphate process to a phosphate-free zirconium pretreatment process. The waste water from the paint pretreatment process will be from the rinse waters and will be approximately 1,100 gallons as a batch discharge when the tanks need to be emptied. The rinse waters will be sent to the 1,500 gallon holding tank for testing and discharged to Outfall 002. The new process is outlined below:

Stage 1 – Alkaline Cleaner
Stage 2 – Rinse
Stage 3 – Rinse
Stage 4 – Zirconium (Duratec 400)
Stage 5 – DI Rinse

A Water Balance Diagram has been included as Figure 2.
3.2 IDEM’s Proposed Modification

General Devices Co., Inc. request to change from an iron phosphate pretreatment process to a phosphate-free zirconium pretreatment process has been accepted. EPA concluded that the zirconization process is a coating process, one of the six core metal finishing operations regulated by the Metal Finishing ELG, and, therefore, any wastewater generated by the process is subject to the Metal Finishing ELG. Therefore, the technology-based standards contained in 40 CFR 433.16 – Metal Finishing Source Category, New Source Performance Standards remain applicable and the limits and monitoring requirements for TSS, Total Cyanide, and Total Toxic Organics are retained from the 2016 Permit.
The limits that were based on the Waste Load Allocation dated July 21, 2006 (Cadmium, Total Chromium, Copper, Lead, Nickel, Silver, and Zinc), were evaluated based on the proposed modification. Because Outfall 002 discharges to a zero flow stream, the increase in flow does not impact the results of the 2006 WLA. Also, none of the metals criteria have been updated and the hardness levels from the downstream station should not have changed significantly since the 2006 WLA. Therefore, limits and monitoring requirements for Cadmium, Total Chromium, Copper, Lead, Nickel, Silver and Zinc are retained from the 2016 Permit.

Please note that when the permit is renewed in 2021, an updated WLA will be needed if the Metals Criteria rulemaking goes through since some of the metals with WQBELs will potentially have revised criteria.

3.3 Antibacksliding

Pursuant to 327 IAC 5-2-10(a)(11), unless an exception applies, a permit may not be renewed, reissued or modified to contain effluent limitations that are less stringent than the comparable effluent limitations in the previous permit. None of the limits included in this permit are less stringent than the comparable effluent limitations in the previous permit, therefore, backsliding is not an issue in accordance with 327 IAC 5-2-10(a)(11).

3.4 Antidegradation

Indiana’s Antidegradation Standards and Implementation procedures are outlined in 327 IAC 2-1.3. The antidegradation standards established by 327 IAC 2-1.3-3 apply to all surface waters of the state. The permittee is prohibited from undertaking any deliberate action that would result in a new or increased discharge of a bioaccumulative chemical of concern (BCC) or a new or increased permit limit for a regulated pollutant that is not a BCC unless information is submitted to the commissioner demonstrating that the proposed new or increased discharge will not cause a significant lowering of water quality, or an antidegradation demonstration submitted and approved in accordance 327 IAC 2-1.3-5 and 2-1.3-6.

The NPDES permit does not propose to establish a new or increased loading of a regulated pollutant; therefore, the Antidegradation Implementation Procedures in 327 IAC 2-1.3-5 and 2-1.3-6 do not apply to the permitted discharge.

3.5 Spill Response and Reporting Requirement

Reporting requirements associated with the Spill Reporting, Containment, and Response requirements of 327 IAC 2-6.1 are included in Part II.B.2.(d), Part II.B.3.(c), and Part II.C.3. of the NPDES permit. Spills from the permitted facility meeting the definition of a spill under 327 IAC 2-6.1-4(15), the applicability requirements of 327 IAC 2-6.1-1, and the Reportable Spills requirements of 327 IAC 2-6.1-5 (other than those meeting an exclusion under 327 IAC 2-6.1-3 or the criteria outlined below) are subject to the Reporting Responsibilities of 327 IAC 2-6.1-7.
It should be noted that the reporting requirements of 327 IAC 2-6.1 do not apply to those discharges or exceedances that are under the jurisdiction of an applicable permit when the substance in question is covered by the permit and death or acute injury or illness to animals or humans does not occur. In order for a discharge or exceedance to be under the jurisdiction of this NPDES permit, the substance in question (a) must have been discharged in the normal course of operation from an outfall listed in this permit, and (b) must have been discharged from an outfall for which the permittee has authorization to discharge that substance.

3.6 Permit Processing/Public Comment

Pursuant to 327 IAC 5-3-9 and 327 IAC 5-3-12, IDEM is required to public notice this draft permit. For this public notice, IDEM will publish a general notice in the newspaper with the largest general circulation within the county that this facility is located. A 30-day comment period is provided 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:

MINOR – MODIFICATION

GENERAL DEVICES CO. INC., Permit No. IN0062626, MARION COUNTY, 1410 S. Post Road, Indianapolis, IN. This modification request is to convert the paint pretreatment process from an iron phosphate process to a phosphate-free zirconium pretreatment process. Permit Manager: Trisha Williams, twilliam@idem.in.gov, 317/234-8210. Published in the Indianapolis Star.

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.