



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

VIA EMAIL

Nicole Goepfrich, Chief Chemist/Pretreatment Coordinator
City of Mishawaka, Wastewater Treatment Plant
1020 Lincolnway West
Mishawaka, Indiana 46544
ngoepfrich@mishawaka.in.gov

Subject: August 28 to 31, 2023, Pretreatment Compliance Inspection Report for the City of Mishawaka, Wastewater Treatment Plant

Dear Ms. Goepfrich:

Please find enclosed a copy of the inspection report generated as a result of the pretreatment compliance inspection of the City of Mishawaka, Wastewater Treatment Plant, conducted by the U.S. Environmental Protection Agency from August 28 to 31, 2023. The purpose of the inspection was to conduct a review of the City's pretreatment program implementation. During the inspection, EPA observed several areas of concern; these are listed in the enclosed report. Please provide a written response to the areas of concern identified in the report within 30 days. In your response, please include a description of actions taken to correct any issues documented in the inspection report. Your response should be submitted electronically to ellens.newton@epa.gov and r5pretreatment@epa.gov. Where it is infeasible to submit electronically, you may mail the information to:

Newton Ellens, EPA Region 5
77 W. Jackson Blvd. (ECW-15J)
Chicago, Illinois 60604-3590

If you have any questions or concerns regarding this letter, or the inspection report, please contact Newton Ellens at (312) 353-5562 or at ellens.newton@epa.gov.

Sincerely,

**MOLLY
SMITH**

Digitally signed by
MOLLY SMITH
Date: 2023.10.31
09:37:41 -05'00'

Molly Smith
Section 1 Supervisor
Water Enforcement and Compliance Assurance Branch

Enclosure

cc: Mary Armacost
Indiana Department of Environmental Management (via email)

Pretreatment Compliance Inspection: Mishawaka, Indiana

Control Authority Name and Address

City of Mishawaka, Wastewater Treatment Plant
1020 Lincolnway West
Mishawaka, Indiana 46544

Responsible Official

Dave Wood, Mayor

Inspection Participants

City of Mishawaka

Mark Curtis, Assistant Manager
Nicole Goepfrich, Chief Chemist/Pretreatment Coordinator
Tim Brill, Division Manager¹

Indiana Department of Environmental Management

Mary Armacost, Pretreatment Coordinator

U.S. Environmental Protection Agency

Jennifer Bush, Environmental Scientist
Newton Ellens, Pretreatment Program Manager

Inspector:

Inspector Signature: _____

Report Date: _____

Approver Name: MOLLY

Approver Signature SMITH

Approval Date: _____

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MOLLY SMITH
Date: 2023.10.31
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¹ Mr. Brill was present for brief times during the inspection. Also, Mr. Brill was present for the closing conference.

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ATTACHMENT I: PATRICK METALS PHOTO LOG

ATTACHMENT II: COMPLEXUS MEDICAL PHOTO LOG

ATTACHMENT III: FEBRUARY 24, 2010, LETTER FROM U.S. ENVIRONMENTAL PROTECTION AGENCY TO CITY OF MISHAWAKA (RE: MISHAWAKA STREAMLINING DOCUMENTS)

ATTACHEMNT IV: LIST OF REQUESTED DOCUMENTS

SECTION 1.0: INTRODUCTION

The U.S. Environmental Protection Agency (EPA) conducted a Federal Pretreatment Compliance Inspection (PCI) of the City of Mishawaka, Wastewater Treatment Plant (Mishawaka, the City, Mishawaka WWTP, or POTW) August 28 to 31, 2023. The purpose of the inspection was to evaluate the procedures and implementation of the Mishawaka WWTP's pretreatment program. Mishawaka has a National Pollutant Discharge Elimination System (NPDES) Permit—Permit No. IN0025640 (Permit IN0025640). Part III.A. of Permit IN0025640 states that the Mishawaka WWTP is required to operate its approved industrial pretreatment program approved on May 16, 1985, and any subsequent modifications approved up to the issuance of this permit. EPA's inspection consisted of:

1. Review of requested submittals prior to on-site inspection;
2. Interviews and discussion with Mishawaka staff;
3. Industrial User (IU) file reviews; and
4. Site visits at two IUs: Patrick Metals and Complexus Medical.

On August 28, 2023, inspectors Newton Ellens and Jennifer Bush arrived at the Mishawaka WWTP, at 1020 Lincolnway West, Mishawaka, Indiana. They met Nicole Goepfrich and Mary Armacost and Mark Curtis. EPA inspectors presented their credentials and began the inspection.

SECTION 2.0: SITE BACKGROUND AND PRELIMINARY REVIEW

Mishawaka WWTP has one wastewater treatment plant. It has a design flow rate of 20 million gallons per day (MGD) and actual flow rate of 10 MGD. The treatment processes at the plant are as follows:

1. Primary—sedimentation;
2. Secondary—aeration; and
3. Tertiary—chlorination.

SECTION 3.0: SUPPLEMENTAL DATA REVIEW/INTERVIEW

Mishawaka WWTP staff stated the following:

A. Pretreatment Program Modification:

According to a report of a 2018 Indiana Department of Environmental Management (IDEM) pretreatment audit, the Mishawaka WWTP did not update its legal authority to reflect the 2005 General Pretreatment Regulation changes (Streamlining rule). However, Mishawaka staff stated that the Streamlining rule had been incorporated into its legal authority.²

B. Legal Authority:

Mishawaka's sewer extends into some unincorporated areas in St. Joseph County (outside the City borders). Mishawaka, however, does not have an interjurisdictional agreement to cover its program in these unincorporated areas. However, there are no significant IUs located in the unincorporated areas.

² At the time of the inspection, Mishawaka WWTP staff could not find a copy of EPA's approval of the POTW's Streamlining rule updates. EPA later provided Mishawaka staff with a copy of EPA's February 24, 2010, approval letter (Attachment III).

C. IU Characterization:

Mishawaka conducts industrial waste surveys throughout each year. The City uses information from the following sources for its surveys:

- City Water Department,
- Google,
- City Planning Department,
- City Engineering Department,
- City Board meetings,
- Drive-byes,
- Well head protection information, and
- Industry water consumption data.

Mishawaka compares survey information to categorical standards to categorize IUs.³

Currently, the City regulates the following IUs:

- Five categorical IUs,
- Three non-categorical SIUs, and
- Three zero dischargers.

D. Hauled Waste:

The Mishawaka WWTP does not accept hauled waste.⁴

E. Application of Pretreatment Standards and Requirements

Mishawaka has set local limits for the following pollutants: arsenic, cadmium, chromium, hexavalent chromium, copper, cyanide, lead, mercury, nickel phenols, selenium, silver, and zinc. Mishawaka set limits for these pollutants based upon their ability to:

1. Pass through the Mishawaka WWTP,
2. Interfere with the Mishawaka WWTP's treatment processes,
3. Contaminate Mishawaka WWTP's sludge,
4. Cause problems in Mishawaka's sewers, or
5. Jeopardize Mishawaka WWTP's workers.

The most stringent criteria for Mishawaka's local limits are the City's NPDES permit limits and the Mishawaka WWTP's susceptibility for plant inhibition.

Mishawaka uses a uniform allocation for its local limits.

Mishawaka last submitted its proposed local limits for review in 2022.

³ EPA requested Mishawaka to provide documentation of its decision to issue an IU permit to Complexus Medical. In response, Mishawaka provided (1) a June 26, 2018, email from Complexus Medical to Mishawaka (Re: New Metal Finishing Site), and (2) a July 9, 2018, email from Mishawaka to Complexus Medical (Re: New Metal Finishing Site). Mishawaka, however, did not provide documentation showing how Mishawaka determined that Complexus Medical should be subject to its pretreatment program.

⁴ Section 62-48 of Mishawaka's sewer use ordinance (SUO) states, "Generators and/or haulers of nonhazardous liquid waste may be allowed to discharge on a discretionary basis with the approval of the superintendent."

Mercury

Currently, the Mishawaka WWTP is subject to an interim annual limit for mercury (2.7 ng/L).⁵ The interim limit is a streamlined mercury variance granted to Mishawaka. Permit IN0025640 requires Mishawaka to monitor its discharge for mercury six times a year. According to the EPA's Enforcement and Compliance History Online (ECHO) webpage, Mishawaka violated its interim mercury limit from February 2022 through February 2023.

Mishawaka has appealed the interim mercury limit. IDEM has approved Mishawaka's appeal; currently, EPA is reviewing it. Mishawaka stated the following in this regard:

- Some of the sampling analysis data used to develop the interim mercury limit is erroneous;
- Mishawaka stated that the laboratory used for mercury analysis (to develop the interim limit) has failed quality assurance and quality control (QA/QC) testing;
- Mishawaka requested EPA to use 24 months of mercury sample analysis results (prior to Mishawaka's permit application) data to determine an interim limit. The current limit is based on 48 months of results; and
- Other publicly-owned treatment works have a less stringent mercury limit.

Permit IN0025640 requires Mishawaka to implement a Pollutant Minimization Program Plan (PMP). Under the PMP, Mishawaka collects mercury samples at its lift stations.⁶ Currently, Mishawaka has not identified a significant source of mercury.

Mishawaka has submitted one-time compliance reports (OTCR) to dentists located in its sewer shed—once in 2017, and once in 2019. Ninety-eight percent of dentists responded to the 2017 survey; 70% of dentists responded in 2019.

F. Compliance Monitoring:

Mishawaka determines adequate IU monitoring frequencies by reviewing IU sample analysis reports, IU inspections, and IU reports. Generally, Mishawaka monitors large IUs and IUs with significant pollutant concentrations more frequently.

Mishawaka staff may conduct the following activities during each IU inspection:

- Observation of conditions outside the IU facility (including stormwater downspouts);
- Interview of IU staff;
- Plant walkthrough (includes review of chemical storage, facility process operations from raw product received to shipping final product, and catch basin inlet); and
- Records review (including IU permit, sample analysis data, and slug plan).

Generally, Mishawaka requires all SIUs to have a slug control plan. Otherwise, Mishawaka evaluates whether each SIU should have a slug control plan when issuing a new IU permit, at permit renewal and during annual inspections.

⁵ The water quality based effluent limits (WQBEL) for mercury are 1.3 ng/L (monthly average) and 3.2 ng/L (daily maximum).

⁶ Under Attachment B.V., Part Three—A and B of NPDES Permit IN0025640, Mishawaka is required to complete mercury monitoring in its collection system within nine months of its streamlined mercury variance (SMV) approval, or by February 1, 2023. However, at the time of the inspection, Mishawaka had not finished collecting mercury samples at all of its lift stations.

The following entities perform Mishawaka's compliance monitoring analysis:

- CF Environmental (a laboratory contractor) conducts analysis for metals, cyanide and oil and grease;
- A CF Environmental subcontractor conducts analysis for organics;
- The Mishawaka WWTF conducts analysis for pH, carbonaceous biochemical oxygen demand (cBOD), total suspended solids (TSS), phosphorous, and ammonia-nitrogen.

Mishawaka uses the following for QA/QC:

- Wearing gloves;
- Chain of custody (COC) forms;
- Sample duplicates;
- Sample blanks;
- Sample spikes;
- Check standards; and
- Method blanks.

G. Enforcement:

Mishawaka's definition of significant noncompliance is similar to the Federal definition. No IUs were in significant noncompliance from January 1, 2022, to the present.

Mishawaka has an enforcement response plan (ERP).⁷ Mishawaka has the authority to use compliance schedules; however, the City has not placed an IU under a compliance schedule in the last several years.

H. Data Management/Public Participation:

Mishawaka handles confidential information in accordance with the City's SUO (Section 62-292). Mishawaka, however, does not have a standard operating procedure for handling confidential information.

For public requests for information, Mishawaka refers those requests to the City legal department for review and approval.

Regarding public participation during the City's revision of its SUO, Mishawaka staff stated that its SUO has not been revised. However, staff stated that if and when the City's SUO will be revised, the revision should be subject to public review. Regarding public participation of the City's local limits: Mishawaka staff stated that proposed local limits must be read twice at City council meetings.

I. Resources:

Mishawaka's annual pretreatment operating budget is \$15,000.

Mishawaka estimated it devotes about 1.2 full-time equivalents to pretreatment program implementation:

⁷ Upon reviewing Mishawaka's ERP, EPA staff noted that the ERP does not identify the title of the person responsible for each type of enforcement response.

- 0.75 FTE from the Chief Chemist/Pretreatment Coordinator;
- 0.25 FTE from the Assistant Manager; and
- 0.2 FTE from two chemists.

Mishawaka uses the following sampling equipment:

- ISCO GLS composite sampler,
- HACH instrument, and
- A pH meter.

SECTION 4.0: FILE REVIEWS

4.1 IU Identification

IU Permit Number	IU Name	IU Type	Avg total flow (gpd)	Avg process flow (gpd)	Visited During Audit?	Reviewer	Categorical Pretreatment Standard
033	Siemens Healthineers	Non-Categorical SIU	400,000	392,000	No	Newton Ellens	N/A
09	AM General, LLC Military Assembly Plant	CIU	130,000	120,000	No	Jennifer Bush	40 CFR 433 METAL FINISHING POINT SOURCE CATEGORY
	Remote Controls Inc.	CIU	78246	75340	No	Mary Armacost	40 CFR 433 METAL FINISHING POINT SOURCE CATEGORY
	Complexus Medical	CIU	5000	1370	Yes	Mary Armacost	40 CFR 433 METAL FINISHING POINT SOURCE CATEGORY
030	Patrick Metals	CIU	18,990	17,200	Yes	Jennifer Bush	40 CFR 467 ALUMINUM FORMING POINT SOURCE CATEGORY
	WestRock CP, LLC	Non-Categorical SIU	3,900	3,000	No	Mary Armacost	N/A
032	Daman Products	CIU	1,919	232	No	Newton Ellens	40 CFR 433 METAL FINISHING POINT SOURCE CATEGORY

4.2 Facility Information

Siemens Healthineers

430 S. Beiger St.

Mishawaka, Indiana 46544

Siemens Healthineers manufactures various diagnostic test strips used to test for various biomarkers via urinalysis. Test strips are manufactured from filter paper or glass fiber paper that are impregnated with product-specific chemical reagents, laminated with an adhesive backing (with a release liner) and slit to a particular width. The facility has no pretreatment system. The facility is a batch discharger.

AM General, LLC Military Assembly Plant (AM General)

13200 McKinley Hwy

Mishawaka, Indiana 46545

The facility assembles and manufactures High Mobility Multi-Purpose Wheeled Vehicles (HMMPWV). Operations primarily consist of metal finishing and assembling of vehicle parts. Raw materials used include: vehicle components, aluminum and steel body parts, and paints. Final products are vehicle parts. The industrial wastewater treatment process is a physical-chemical process consisting of: (1) acid addition to optimize pH for phosphorus removal; (2) ferric chloride and calcium chloride addition to remove phosphorus; (3) pH neutralization to precipitate metals; (4) polymer addition to promote flocculation; and (5) settling. The sludge is removed and sent to a pressure filter. The filtrate drains back to the plant, and the filter cake is placed in a dump bin for disposal. There is one outfall to the sewer system (#09). The IU is a batch discharger for process waste water; non-process sanitary discharge is continuous. The batch discharge occurs two to three times a week, with an average of 120,000 gallons in each batch. The sanitary discharge is continuous and is approximately 11,600 gallons a day.

Remote Controls Inc. (Remote Controls)

512 S. Merrifield Ave

Mishawaka, Indiana 46544

The facility conducts metal finishing on aluminum and steel parts. Parts are received and prepped for finishing and then go through a black oxide coating, aluminum chrome conversion, aluminum anodization, chromic acid treatment, or manganese and zinc phosphating. Parts are then washed and rinsed and can be sealed or dyed. Waste streams come from the black oxide line, the aluminum conversion process, the aluminum anodization, the chromic acid treatment, the manganese and zinc phosphate lines, sealing, and drying. There is no treatment of waste. The facility has one outfall and discharges continually. The facility operates 20 days per month.

Complexus Medical

55980 N Russell Industrial Parkway

Mishawaka, Indiana 46545

The facility cuts raw material to length, and machines material (drill, mill, tool). Parts are inspected, cleaned, electropolished, assembled, final finished, packed, & shipped. For pretreatment, the facility

uses a carbon system, a 20-micron bag filter, and pH adjustment in 2 towers. The facility discharges batches through one outfall.

Patrick Metals
5020 Lincolnway East
Mishawaka, Indiana 46544

The facility conducts extrusion of aluminum parts, then washes and rinses them. After rinsing the parts are then powder coated. Raw materials used include aluminum alloy and T61C polyester powder coating. The final product is customized aluminum extrusions, including but not limited to rods, beams, tubing, and wire harnesses. The overflow rinse is pumped from a sump pit to (1) a treatment tank, (2) clean water tank, and (3) pH adjustment, before being discharged. Water from remaining stages is pumped to a holding tank where solids are settled. The separated liquid is slowly mixed with rinse water from the treatment tank, then over to a clean water tank, pH adjusted, and discharged. There is one discharge to the sewer system (discharge point 030). The facility discharges continuously.

WestRock CP, LLC (WestRock)
1925 Stone Court
Mishawaka, Indiana 46545

Rolls of paper stock are corrugated by flute and glue. They are then cut, scored, printed, folded, and glued into boxes and packages. The product is then stacked, banded, and shipped. Wastewater treatment consists of an accumulator tank, in which caustic soda, a coagulant, and a polymer are added. Treated water is then sent to a clean water tank and discharge to the collection system leading to the Mishawaka POTW.

Daman Products
1811 N. Home St.
Mishawaka, Indiana 46545

The IU machines aluminum, ductile iron, carbon steel and stainless steel. The facility utilizes mazak machine milling to produce hydraulic manifolds and other miscellaneous hydraulic parts. Pretreatment includes ultra-filtration. The IU discharges in batches.

4.3 IU Evaluation

A. Issuance of IU Control Mechanism

Statement of Non-transferability

For Siemens Healthineers, AM General, Patrick Metals and Daman Products - The statement of non-transferability does not require the existing operator or owner to provide a copy of the existing permit to the new owner or operator.

For Daman Products - the statement of non-transferability requires the IU to give advance notice to the POTW's superintendent. The POTW, however, does not have a superintendent position.

Applicable effluent limits (local limits, categorical standards, Best Management Practices)

For Complexus Medical and Daman Products - The daily maximum categorical limits for cadmium, lead, and silver are more stringent than the local limits for these pollutants. However, the IU permits do not include the categorical limits for these pollutants. The IU permits do not include monthly average categorical limits for cadmium, chromium, lead, silver, and cyanide.

Sampling locations/discharge points

Patrick Metals – The IU permit lists a room as a sample location. It does not include a specific monitoring point.

Sample types (grab or composite)

Siemens Healthineers - The IU permit defines a daily composite sample as "grab samples collected at equal time intervals (no more than two hours apart) over a 24-hour sampling period." The IU file does not include documentation of Mishawaka's decision to allow the alternative sampling (including a determination that time-based composite sampling is representative of the discharge).

AM General – The IU permit requires grab samples for total mercury. The IU file does not include documentation of Mishawaka's decision to allow alternative sampling (including a determination that grab samples are representative of the discharge). Also, the IU permit does not clarify whether 24-hr composite samples must be time-based composites or flow-based composites.

Patrick Metals - The IU permit has 24-hour composite sample requirements; however, the permit does not clarify whether composite samples must be time-based or flow-based composites.

WestRock – The IU permit has grab sample requirements for all analytes. The IU file does not include documentation of Mishawaka's decision to allow alternative sampling, including a determination that grab samples are representative of the discharge—for pollutants that must be sampled using 24-hour, flow-proportional composite sampling techniques, per 40 C.F.R. § 403.12(g)(3).

Daman Products - The permit has grab sample requirements for all pollutants (including copper, zinc, nickel, and mercury). The IU file does not include documentation of the POTW's decision to allow alternative sampling for these metals (including a determination that grab sampling is representative of the discharge) .

Record-keeping requirements

Each IU permit requires the IU to retain records for a minimum of three years; however, each IU permit does not:

- Require the IU to retain records of monitoring activities and results, whether or not such monitoring activities are required;
- Require the IU to make records available for inspection and copying by the EPA and Mishawaka; or

- State that the record retention period may be extended during the course of any unresolved litigation regarding the IU (in addition to issues regarding the discharge of pollutants by the IU), or when requested by the EPA.

Notification of spills, bypasses, upsets, etc.

Remote Controls - The IU permit does not include upset notification requirements.

Other

Each IU permit states, “As part of the City’s CSO LTCP, the IU will need to control its discharge to the greatest extent during wet weather periods. Normally, if batch dischargers are occurring, flows should be controlled until after a wet weather event has ended. This ensures that the discharge would be fully transported and treated at the POTW.” This IU permit provision is not enforceable. NPDES Permit IN0025640, Attachment A, Section IV.A.3. requires Mishawaka to “review and modify, as appropriate, its existing pretreatment program to minimize CSO impacts from non-domestic users.”

B. Application of IU Pretreatment Standards:

Classification by category/subcategory

AM General – The IU permit file does not include documentation of how the POTW determined the IU to be subject to 40 C.F.R. Part 433.

Patrick Metals – The IU file does not indicate which subcategory (or subcategories) under 40 C.F.R. Part 467 apply to the IU. Also, the IU file did not include documentation supporting the production-based standards in the IU permit; the IU file does not include production-based standard calculations.

Classification as new/existing source

For each CIU: the IU file does not have documentation showing when each source was constructed. The construction date would help Mishawaka determine whether the CIU is a new or existing source.

Monitoring Waivers

For AM General, Remote Controls, Complexus Medical, and Daman Products – The CIU permits do not include a description of the necessary process for seeking a waiver for a pollutant neither present nor expected to be present in the discharge.

Complexus Medical – Mishawaka waived monitoring requirements for three categorical pollutant parameters: cadmium, lead and silver. However, the IU permit does not indicate that monitoring requirements for those pollutants have been waived.⁸

⁸ During the file review, Mishawaka staff stated that it did not require Complexus to provide sampling data of the facility’s wastewater prior to any treatment, as part of the IU’s monitoring waiver application.

Patrick Metals – The IU permit includes a description of the process needed to seek a monitoring waiver for only for total toxic organics (TTO) and oil & grease.

C. CA Compliance Monitoring

Sampling (once a year, except as otherwise specified)

Complexus Medical – POTW monitoring records (for sampling conducted from 2020 through 2022) do not include any TTO sampling results.

WestRock – POTW monitoring records (for sampling conducted from 2020 through 2022) do not include sample analysis data for the following pollutant parameters: arsenic, cadmium, chromium, hexavalent chromium, lead, phenols, selenium, and silver.

Analysis for all regulated parameters

Siemens Healthineers - For sampling conducted from 2020 through 2022, the POTW's reports do not include results for arsenic, cadmium, chromium, hexavalent chromium, cyanide, lead, nickel, phenols, selenium, and silver.

AM General – the POTW monitoring records for the last three years (2023, 2022, 2021) do not show that all local limits were included in analysis. Specifically:

- The records do not include analysis of arsenic, hexavalent chrome, or selenium;
- Some 2020 POTW monitoring records do not include analytical results for mercury; and
- 2021 POTW monitoring results do not include analytical results for phenols.

Remote Controls – POTW sample analysis reports (for sampling conducted from 2020 through 2022) do not include analytical results for arsenic, hexavalent chromium, phenols, & selenium.

Complexus Medical – POTW sample analysis reports (for sampling conducted from 2020 through 2022) do not include results for mercury.

Patrick Metals - POTW sample analysis reports (for sampling conducted from 2020 through 2022) do not include analytical results for all local limits. Specifically, for POTW sampling conducted from 2020 through 2022, the reports:

- Do not include results for arsenic, cadmium, hexavalent chromium, lead, nickel, selenium, or silver;
- Only include Copper results for the first quarter of 2021;
- Do not include chromium results for the first quarter of 2021;
- Do not include phenols for 2021; and.
- Do not include mercury results for 2020 and 2021.

Daman Products - 2022 sample analysis reports (for samples collected on 1/19/22, 5/6/22, 8/10/22, and 10/19/22) do not include results for arsenic, hexavalent chromium, and selenium.

Appropriate sampling techniques and analytical methods (40 CFR Part 136)

Daman Products - For a sample collected on October 19, 2022, the practical quantitation limit (PQL) for certain TTOs were above the regulatory concentration (that defines a TTO). Examples include acrolein (50 ug/L), acrylonitrile (50 ug/L), and acenaphthene (50 ug/L). TTO results from a 5/2/23 self-monitoring report also show high PQLs: e.g., acrolein (50.0 ug/L), acrylonitrile (50.0 ug/L), benzidine (500ug/L).

Patrick Metals – The IU file includes a July 23, 2021, Notice of Violation letter that states the POTW observed process wastewater on top of a stand pipe attached to a drain line. However, the IU file does not include documentation that shows how the POTW identified this violation.

D. CA Enforcement Activities

Identification of discharge violations

Daman Products - The self-monitoring report (for a sample collected on 5/2/23) shows a phenol result of 5.71 mg/l. Phenol is a TTO, and the TTO limit is 2.13 mg/l (under the Metal Finishing Point Source Category). The POTW, however, did not cite Daman Products for this TTO violation.

Identification of monitoring/reporting violations

Patrick Metals – In 2020 and 2021, the IU collected grab samples for metals analysis, in violation of composite sampling requirements. However, the IU file does not include documentation of an enforcement action against the IU for this violation.

Other

AM General – The POTW cited the IU for not reporting TTO sample analytical results in December 2021; however, the IU file does not include any follow-up documentation between the IU and POTW.

E. IU Compliance Status

Analysis by IU of all required pollutants in accordance with appropriate sampling techniques and analytical methods

Siemens Healthineers – The IU's self-monitoring reports do not include the pH analytical method (for samples collected on 7/14/23, 6/8/22, 12/7/22, and 5/28/21).

Reporting by IU on all required pollutants

Remote Controls, Complexus Medical, and WestRock – The results in the IU self-monitoring reports do not include units for flow values (for sampling conducted from 2020 through 2022).

Patrick Metals – The IU’s mercury results were not included in the semi-annual reports for the 2022 calendar year. Also, the IU self-monitoring reports do not include a reasonable measure of the IU’s long-term production rate.

IU notification within 24-hours of becoming aware of discharge violations including slug loading or accidental spill

Daman Products – According to a self-monitoring report for a May 4, 2023, sample, the IU’s discharge had a phenol concentration of 5.71 mg/L, an exceedance of the 2.13 mg/L TTO limit under the Metal Finishing Point Source Category. The IU file, however, does not include records of:

- The IU notifying the POTW about this effluent limit exceedance within 24 hours after becoming aware of the violation, or
- Results of the IU resampling its discharge within 30 days of becoming aware of the violation.

IU submission/implementation of slug discharge control plan

Siemens Healthineers - The IU's slug discharge control plan doesn't include a description of discharge practices or procedures to immediately notify the POTW of slug discharges.

Remote Controls – The IU’s slug plan directs the responder to a separate Contingency Plan for responses and who to call at the POTW.

SECTION 5.0: INDUSTRIAL USER SITE VISITS

Patrick Metals.
5020 Lincolnway E
Mishawaka, IN 46544

Date of site visit: August 30, 2023

Inspection Participants:

Patrick Metals:
Brian Ledford, Maintenance Manager
Juan Navarro, Maintenance and Purchasing Manager

Industrial Safety and Environmental Services (ISES):
Justin Finger, Environmental Consultant for Patrick Metals

Mishawaka WRRF
Mark Curtis, Assistant Manager
Nicole Goepfrich, Pretreatment Coordinator and Head Chemist

EPA
Newton Ellens, Pretreatment Program Manager
Jennifer Bush, Environmental Scientist

IDEM

Mary Armacost, Pretreatment Coordinator

EPA, IDEM, and Mishawaka WRRF arrived at Patrick Metals at approximately 1:35 PM EDT and were met at the front by Juan Navarro (Purchasing and Maintenance Manager), Brian Ledford (Maintenance Manager), and Justin Finger (Patrick Metals Environmental Consultant). EPA staff showed Patrick Metals staff their credentials and began the opening conference. Mishawaka took over the opening conference after EPA completed introductions and site visit overview. The following information was provided to EPA, IDEM, and Mishawaka by Patrick Metals staff:

- General Plant Information:
 - There are approximately 110 employees onsite.
 - Shifts are 5 days per week, Monday – Friday. The first shift is scheduled as 6:00 AM – 2:00 PM, and second shift is 2:00 PM – 10:00 PM. All times in EDT.
 - The average production days per month is 20 – 22 days; however, production is currently slower than usual. The facility said production is currently closer to 20 days per month.
 - Previously the paint line was used during both shifts; however, due to the decrease in production, it is now used for about half of one shift.
 - It was not determined when operations at the facility began.
- Manufacturing Process:
 - Patrick Metals is a custom aluminum extrusions facility.
 - Patrick Metals receives aluminum logs, which are shaped and painted into custom-made pieces depending on customer orders.
 - Raw materials used on site include aluminium alloys, paint, cleaning products, additives, solvents, and sulfuric acid.
 - The process begins with the aluminum logs, which are then heated to approximately 1,000 degrees Fahrenheit. From there, the logs are sheered into pieces depending on customer request for size and length.
 - The aluminum log is sent through a press to be shaped, then goes through a cooling table, followed by a stretcher, then finish saw, prior to the age oven to bake to alloy as needed.
 - After the alloy, the finished product is either shipped off site, painted, or cut into additional pieces.
 - For the aluminum alloy, it is set up to be an 8-stage process, but the facility only uses 7 stages. Power coating occurs after the seven stages. The stages are listed below:
 - Stage 1: Spray Clean (ALX88)
 - Stage 2: Fresh water rinse
 - Stage 3: Fresh water rinse
 - Stage 4: AMB5146 + AMB2 (Etching)
 - Stage 5: Fresh water rinse
 - Stage 6: Fresh water rinse
 - Stage 7: Fresh water rinse
 - The facility plans to add a cooling tower to the process line, but it won't be online for at least another 3 months. Mishawaka requested notification/additional information from the facility prior to the cooling tower going online.

- Patrick Metals is currently extruding an estimated 35,000 – 40,000 pounds a day of aluminum, which is a decrease of approximately 40 – 50% of the typical production. The facility noted this production reduced due to product demand approximately 3 – 4 months ago, and Patrick Metals does not anticipate the production increasing again for the remainder of the year. Patrick Metals tracks the production rate internally and has not submitted this rate to the WWTP historically.
- The water intake is typically about 19,000 gallons per day. However, the last three months the average has been about 7,000 gallons per day due to the production decrease.
- Pretreatment:
 - The pretreatment system uses caustic oil to adjust the pH as needed.
 - The process water is drained to a holding tank before being bled into the treatment tank at specific rates (depending on how quickly the water can be treated).
 - The process water pH is adjusted within the treatment tank, with pH detectors on either end of the tank in order (going in or out of the tank). The facility noted the tank has an alarm system that will sound if water leaving the treatment tank has a pH too low or too high.
 - All 7 stages of the aluminum alloy process is drained through the holding and pretreatment tank before being discharged to the WWTP.
- Waste Generation:
 - The caustic oil used within the pretreatment process is put into a sump, toted, and hauled offsite.
 - Patrick Metals estimated about 16,500 gallons of used oil per year is hauled off site. Patrick Metals works with Safety Kleen for hauling waste.
 - Aluminum scraps are saved and recycled by the facility.
 - There is a deburring system online at Patrick Metals that does not go through treatment onsite. This waste is toted and hauled off site.
- Wastewater Sampling:
 - There are two sampling locations at Patrick Metals – one part of the line used by the POTW, and the other part of the line is used by the facility for self-monitoring.
 - The Class D Operator is an externally contracted position by Patrick Metals. The Class D Operator collects samples for the facility, but all sampling equipment is owned by Patrick Metals.
 - Patrick Metals discharges continuously.

Plant Walk Through

Patrick Metals staff showed EPA inspectors, IDEM, and Mishawaka WWTP staff the following during the plant walk through:

- Beginning product (logs)
 - All logs brought in by Patrick Metals
- Heater
 - All logs get heated to around 1,000 degrees Fahrenheit before sheering to customer-specific lengths.
- Press
 - Aluminum logs are shaped in the press.

- Cooling Table
- Stretcher
- Finish saw
- Age Oven
- Alloy
- Paint Line

Records Review

During the opening conference, Mishawaka requested documents as part of the Mishawaka WWTP inspection. Documents viewed include the slug plan, the current IU permit, and monitoring data.

Closing Conference

EPA, IDEM, and Mishawaka staff completed the site walk through at 4:25 PM EDT. No closing conference was held at Patrick Metals.

Complexus Medical
55980 N Russell Industrial Parkway
Mishawaka, IN 46545

Date of site visit: August 31, 2023

Inspection Participants:

Complexus Medical:
 Stephen VanDalsen, Operations Manager
 Shane Johnson, Maintenance Manager

Mishawaka WRRF
 Mark Curtis, Assistant Manager
 Nicole Goepfrich, Pretreatment Coordinator and Head Chemist

EPA
 Newton Ellens, Pretreatment Program Manager
 Jennifer Bush, Environmental Scientist

IDEM
 Mary Armacost, Pretreatment Coordinator

EPA, IDEM, and Mishawaka WRRF arrived at Complexus Medical at approximately 8:15 AM EDT and were met at the front by Stephen VanDalsen (Operations Manager). EPA staff showed Complexus staff their credentials and began the Opening Conference. Mishawaka WWTP staff took over the opening conference after EPA completed introductions and site visit overview. The following information was provided to EPA, IDEM, and Mishawaka WWTP staff by Complexus Medical staff:

- General Plant Information:
 - There are approximately 101 employees onsite. There is one other Complexus Medical location with an additional 25 employees.
 - The facility is open 7 days per week, with 3 different shifts. This is broken up by first shift, second shift, and weekend shift. The first shift is scheduled as 7:00 AM – 4:30 PM. The second shift is scheduled as 4:30 PM – 5:00 AM. The weekend shifts are 5:00 AM – 5:30 PM. All times are in EDT.
 - Complexus Medical reports discharge of facility to WWTP monthly via the self-monitoring reports.
 - All intake water is discharged through process water and sanitary. There is no loss of water from the facility process.
 - Complexus Medical discharges in small batches every 15 minutes.
 - The facility flow meter is replaced each year instead of calibrated. This is due to budget (it is less expensive to replace than to calibrate).
 - Floor drains on the warehouse floor are currently plugged, but Complexus Medical plans to use these at a later date.
 - Prior to the site visit, WWTP had issued a Notice of Violation to Complexus Medical for lack of a Class D operator, as required in the IU permit. Complexus Medical confirmed a Class D operator has since been hired.
 - It was not determined when operations at the facility began.
- Manufacturing Process:
 - Complexus Medical is a medical device manufacturer. The facility makes instruments used for surgeries (hips, knees, spine, ankle, and shoulder). The majority of pieces made are for knee surgeries.
 - Raw material is received at the facility via truck. Raw materials include titanium, stainless steel, and plastics. Material coming in to the facility has a width of 1.5 inches or less.
 - Material is received in bar form and is cut and reshaped as needed. Some pieces are shipped out for heat treatment to be hardened if needed. Pieces are finished with belt or sand blast.
 - City water is pumped in through the reverse osmosis system and is stored in tanks. Water is pumped and used for rinse in multiple processes before pumping to the pretreatment.
 - There is an electropolishing process on site as well. Each part is cleaned and then processed depending on the final product. The stages of the electropolishing are listed below:
 - Ultrasonic Clean
 - Primary Tank (detergent)
 - Rinse Tank (hot)
 - Final Rinse Tank (cold)
 - Passivation – Citric
 - Rinse Tank
 - Hot Bath
 - Electropolish 4000
 - Primary Tank (acid)
 - Rinse Tank (cold)
 - Final Rinse Tank (cold)

- Every part goes through the Ultrasonic Clean, and then will go to either the Passivation or Electropolish process.
- The acid in the EP4000 process is sulfuric and phosphoric acid. This is the raw form with metals mixed in order to enrich the solution.
- Any material coming in has a “Job Traveler” at each stage to document what process is used.
- Coolant in machines are reused in a closed loop system. If the coolant needs to be replaced, it is put in totes and hauled off site.
- Pretreatment:
 - All water used in the three process lines are pumped to the pretreatment/adjustment area. If there is a need for a tank to be cleaned, this water will be hauled off site.
 - Once water from the EP Room is pumped into Pretreatment, water will go through “Column A” and “Column B”.
 - The two columns are a carbon filtration system in order to adjust the pH.
 - The initial pH going into Column A is read by Shane Johnson, who then uses the reading to adjust the water in Column B. The water from the EP Room is typically more acidic (around 5.5).
 - After Column B, water is discharged to the WWTP.
- Waste Generation:
 - Complexus Medical has waste oils, trap oils, and any discarded coolant hauled off site by Polar or Safety Kleen.
 - Mop water used in the facility is also hauled off site.
 - There are two totes of approximately 500 gallons hauled off site once per month.
 - Complexus Medical generates metal chips/shavings (titanium, stainless steel, and aluminum) that are saved and hauled off. This happens about every month and a half.
- Wastewater Sampling:
 - There are two sampling locations at Complexus Medical. The grab sample location is on the Work Tank near the pH adjustment area. The composite sampling location (and flow meter) are located near the RO system.
 - Shane Johnson, the maintenance manager, conducts sampling for Complexus Medical.
 - Complexus Medical discharges small batches every 15 minutes.

Plant Walk Through

Complexus Medical staff showed EPA inspectors, IDEM, and Mishawaka WWTP staff the following during the plant walk through:

- Beginning products
 - Titanium, stainless steel, etc.
- Warehouse floor
 - Water generation and RO system
 - Saw Area – if cutting is required
 - Swiss Area
- Electropolish Passivation Room (EP Room)
- Pretreatment Room

Records Review

During the opening conference, Mishawaka requested documents as part of the Mishawaka WWTP inspection. Documents viewed include the slug plan, the current IU permit, and the last three years of monitoring data. At the time of the inspection, Complexus Medical was unable to locate the full IU permit. Mishawaka WWTP staff provided a copy. Complexus Medical staff saved the copy in a more accessible location for future use.

Closing Conference

EPA, IDEM, and Mishawaka staff completed the site walk through at 10:20 AM EDT. No closing conference was held at Complexus Medical.

SECTION 6.0: SUMMARY OF FINDINGS

A. Areas of Concern

Regulatory Citation	Site Background & Inspection Observations	Report Section
NPDES Permit No. IN0025640, Part III.A.7. 40 C.F.R. § 403.8(f)(2)(i)	EPA requested Mishawaka to provide documentation of its decision to issue an IU permit to Complexus Medical. In response, Mishawaka provided (1) a June 26, 2018, email from Complexus Medical to Mishawaka (Re: New Metal Finishing Site), and (2) a July 9, 2018, email from Mishawaka to Complexus Medical (Re: New Metal Finishing Site). Mishawaka, however, did not provide documentation showing how Mishawaka determined that Complexus Medical should be subject to its pretreatment program.	3.0 C.
NPDES Permit No. IN0025640, Part I.A.3., Table 4	According to the EPA's Enforcement and Compliance History Online (ECHO) webpage, Mishawaka violated its 2.7 ng/L mercury limit from February 2022 through February 2023.	3.0 E.
NPDES Permit IN0025640, Attachment B.V., Part Three—A and B	Mishawaka is required to complete mercury monitoring in its collection system within nine months of its streamlined mercury variance (SMV) approval, or by February 1, 2023. However, at the time of the inspection, Mishawaka had not finished collecting mercury samples at all of its lift stations.	3.0 E.

40 C.F.R. § 403.8(f)(5)(iii)	Mishawaka's ERP does not identify the title of the person responsible for each type of enforcement response.	3.0 G.
40 C.F.R. § 403.8(f)(2)(iii) 40 C.F.R. § 403.8(f)(2)(iv) 40 C.F.R. § 403.12(j)	During the August 30, 2023, site visit at Patrick Metals: - The IU could not provide the date when facility operations began. This would inform the POTW's determination of whether the IU is a new or existing source. - Patrick Metals is currently extruding an estimated 35,000 – 40,000 pounds a day of aluminum, which is a decrease of approximately 40 – 50% of the typical production. (The limits in the IU permit are based on a 110,000 pounds per day production rate.) The facility noted this production reduced due to product demand approximately 3 – 4 months ago, and Patrick Metals does not anticipate the production increasing again for the remainder of the year. - The water intake is typically about 19,000 gallons per day. However, the last three months the average has been about 7,000 gallons per day due to the production decrease. During the August 31, 2023, site visit at Complexus: - The IU could not provide the date when facility operations began. This would inform the POTW's determination of whether the IU is a new or existing source.	5.0
40 C.F.R. §	File Reviews	Report Section
403.8(f)(1)(iii)(B) (2)	For Siemens Healthineers, AM General, Patrick Metals and Daman Products - The statement of non-transferability does not require the existing operator or owner to provide a copy of the existing permit to the new owner or operator. For Daman Products - the statement of non-transferability requires the IU to give advance notice to the POTW's superintendent. The POTW, however, does not have a superintendent position.	4.3 A.
403.8(f)(1)(iii)(B) (3)	For Complexus Medical and Daman Products - The daily maximum categorical limits for cadmium, lead, and silver are more stringent than the local limits for these pollutants. However, the IU permits do not include the categorical limits for these pollutants. The IU permits do not	4.3 A.

	include monthly average categorical limits for cadmium, chromium, lead, silver, and cyanide.	
403.8(f)(1)(iii)(B) (4)	Patrick Metals — The IU Permit lists room for as a sample location. It does not include a specific monitoring point.	
403.12(g)(3)	Siemens Healthineers - The IU permit defines a daily composite sample as "grab samples collected at equal time intervals (no more than two hours apart) over a 24-hour sampling period." The IU file does not include documentation of Mishawaka's decision to allow the alternative sampling (including a determination that time-based composite sampling is representative of the discharge). AM General – The IU permit requires grab samples for total mercury. The IU file does not include documentation of Mishawaka’s decision to allow alternative sampling (including a determination that grab samples are representative of the discharge). Also, the IU permit does not clarify whether 24-hr composite samples must be time-based composites or flow-based composites. Patrick Metals - The IU permit has 24-hour composite sample requirements; however, the permit does not clarify whether composite samples must be time-based or flow-based composites. WestRock — The IU permit has grab sample requirements listed for all analytes. The IU file does not include documentation of Mishawaka’s decision to allow alternative sampling, including a determination that grab sampling is representative of the discharge—for pollutants that must be sampled using 24-hour, flow-proportional composite sampling techniques, per 40 C.F.R. § 403.12(g)(3). Daman Products - The permit has grab sample requirements for all pollutants (including copper, zinc, nickel, and mercury). The IU file does not include documentation of the POTW's decision to allow alternative sampling for these metals (including a determination that grab sampling is representative of the discharge).	4.3 A.
403.8(f)(1)(iii)(B) (4)	Each IU permit requires the IU to retain records for a minimum of three years; however, each IU permit does not:	
403.12(e)(2)(iii)	• Require the IU to retain records of monitoring activities and results--whether or not such monitoring activities are required; • Require the IU to make records available for inspection and copying by the EPA and Mishawaka; or	4.3 A.

	State that the record retention period may be extended during the course of any unresolved litigation regarding the IU (in addition to issues regarding the discharge of pollutants by the IU), or when requested by the EPA. Remote Controls Inc. - IU permit does not include upset notification requirements. For AM General, Remote Controls, Complexus Medical, and Daman Products – The CIU permits do not include a description of the necessary process for seeking a waiver for a pollutant neither present nor expected to be present in the discharge. Complexus Medical – Mishawaka waived monitoring requirements for three categorical pollutant parameters: cadmium, lead and silver. However, the IU permit does not indicate that monitoring requirements for those pollutants have been waived. During the file review, Mishawaka staff stated that it did not require Complexus to provide sampling data of the facility’s wastewater prior to any treatment, as part of the IU’s monitoring waiver application. Patrick Metals – The IU permit includes a description of the description of the process needed to seek a monitoring waiver for only for TTO and oil & grease.	
403.8(f)(1)(iii)(B)	Each IU permit states, “As part of the City’s CSO LTCP, the IU will need to control its discharge to the greatest extent during wet weather periods. Normally, if batch dischargers are occurring, flows should be controlled until after a wet weather event has ended. This ensures that the discharge would be fully transported and treated at the POTW.” This IU permit provision is not enforceable.	4.3 A.
403.8(f)(2)(iii)	AM General – The IU permit file does not include documentation of how the POTW determined the IU to be subject to 40 C.F.R. Part 433. Patrick Metals – The IU file does not indicate which subcategory (or subcategories) under 40 C.F.R. Part 467 apply to the IU. Also, the IU file did not include documentation supporting the production-based standards in the IU permit; the IU file does not include production-based standard calculations. For each CIU: the IU file does not have documentation showing when each source was constructed. The construction date would help the POTW determine whether the facility is a new or existing source	4.3 A.

403.8(f)(2)(v)	Complexus Medical – POTW monitoring records (for sampling conducted from 2020 through 2022) do not include any TTO sampling results. WestRock – POTW monitoring records (for sampling conducted from 2020 through 2022) do not include sample analysis data for the following pollutant parameters: arsenic, cadmium, chromium, hexavalent chromium, lead, phenols, selenium, and silver. Siemens Healthineers - For sampling conducted from 2020 through 2022, the POTW's reports do not include results for arsenic, cadmium, chromium, hexavalent chromium, cyanide, lead, nickel, phenols, selenium, and silver. AM General – the POTW monitoring records for the last three years (2023, 2022, 2021) do not show that all local limits were included in analysis. Specifically: • The records do not include analysis of arsenic, hexavalent chrome, or selenium; • Some 2020 POTW monitoring records do not include analytical results for mercury; and • 2021 POTW monitoring results do not include analytical results for phenols. Remote Controls – POTW sample analysis reports (for sampling conducted from 2020 through 2022) do not include analytical results for arsenic, hexavalent chromium, phenols, & selenium. Complexus Medical – POTW sample analysis reports (for sampling conducted from 2020 through 2022) do not include results for mercury. Patrick Metals - POTW sample analysis reports (for sampling conducted from 2020 through 2022) do not include analytical results for all local limits. Specifically, for POTW sampling conducted from 2020 through 2022, the reports: • Do not include results for arsenic, cadmium, hexavalent chromium, lead, nickel, selenium, or silver; • Only include Copper results for the first quarter of 2021; • Do not include chromium results for the first quarter of 2021; • Do not include phenols for 2021; and • Do not include mercury results for 2020 and 2021.	4.3 A.
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	Daman Products - 2022 sample analysis reports (for samples collected on 1/19/22, 5/6/22, 8/10/22, and 10/19/22) do not include results for arsenic, hexavalent chromium, and selenium.	
403.8(f)(2)(vii)	Daman Products - For a sample collected on 10/19/22, the practical quantitation limit (PQL) for certain TTOs were above the regulatory concentration (that defines a TTO). Examples include acrolein (50 ug/L), acrylonitrile (50 ug/L), and acenaphthene (50 ug/L). TTO results from a 5/2/23 self-monitoring report show high PQLs: e.g., acrolein (50.0 ug/L), acrylonitrile (50.0 ug/L), benzidine (500ug/L). Patrick Metals – The IU file includes a July 23, 2021, Notice of Violation letter that states the POTW observed process wastewater on top of a stand pipe attached to a drain line. However, the IU file does not include documentation that shows how the POTW identified this violation.	4.3 A.
403.8(f)(5)	Daman Products - The self-monitoring report (for a sample collected on 5/2/23) shows a phenol result of 5.71 mg/l. Phenol is a TTO, and the TTO limit is 2.13 mg/l (under the Metal Finishing Point Source Category). In addition, the IU did not notify the POTW about the violation; nor did the IU resample its discharge and submit results of the re-sampling. The POTW, however, did not cite Daman Products for (1) the TTO violation, (2) failure to notify the POTW 24 hours after becoming aware of the violation, and (3) failure to resample its discharge and submit the results. AM General – The POTW cited the IU for not reporting TTO sample analytical results in December 2021; however, the IU file does not include any follow-up documentation between the IU and POTW.	4.3 C., D.
403.8(f)(2)(iv) 403.12(g)(3) 403.12(g)(5) 403.12(e)(1) and (4)	Patrick Metals – In 2020 and 2021, the IU collected grab samples for metals analysis, in violation of composite sampling requirements. However, the IU file does not include documentation of an enforcement action against the IU for this violation. Siemens Healthineers – The IU’s self-monitoring reports do not include the pH analytical method.(for samples collected on 7/14/23, 6/8/22, 12/7/22, and 5/28/21). Patrick Metals - The mercury results were not included in the semi-annual reports for the 2022 calendar year. Also, the IU self-monitoring reports do not include a reasonable measure of the IU’s long-term production rate. Remote Controls, Complexus, and WestRock. – The results in the IU self-monitoring report do not include units not listed for flow values (for sampling conducted from 2020 through 2022).	4.3 D., E.

403.8(f)(2)(vi)	Siemens Healthineers - The IU's slug discharge control plan doesn't include a description of discharge practices or procedures to immediately notify the POTW of slug discharges. Remote Controls Inc. — The IU's slug plan directs the responder to a separate Contingency Plan for responses and who to call.	4.3 A.
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B. Other Findings

40 C.F.R. Part	Site Background & Inspection Observations	Report Section
40 C.F.R § 403.14(c)	Mishawaka does not have a standard operating procedure for handling confidential information	3.0 H.