

**CWA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

Purpose: Pretreatment Industrial User (IU) Inspection

Facility: Honda Development and Manufacturing of America, LLC—Indiana Auto Plant
2755 North Michigan Avenue
Greensburg, Indiana 47240

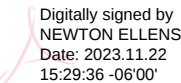
Date of Inspection: September 12, 2023

EPA Representatives: Newton Ellens, Pretreatment Program Manager, 312-353-5562
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Joseph Forth, Environmental Engineer, 312-886-7275
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IDEM Representatives: Mary Armacost, Pretreatment Coordinator, 317-234-4816
Christina Sandlin, Wastewater Inspector, 812-216-5646

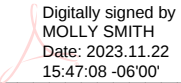
Facility Representatives: Belinda Heath, Environmental Team
Jonathan Nelson, Green Facility Lead, 812-651-6051
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Arnie Bauawa, Environmental Engineer

Report Prepared by: Newton Ellens, Pretreatment Program Manager, 312-353-5562
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Inspector Signature: NEWTON ELLENS  Digitally signed by
NEWTON ELLENS
Date: 2023.11.22
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Report Date: _____

Approver Name and Title: Molly Smith, Section Chief, Water Enforcement and Compliance Assurance Branch

Approver Signature: MOLLY SMITH  Digitally signed by
MOLLY SMITH
Date: 2023.11.22
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Approval Date: _____

Purpose of Inspection

The purpose of the inspection was to evaluate, and document compliance with the Clean Water Act (CWA) and associated pretreatment regulations with respect to Honda Development and Manufacturing of America, LLC—Indiana Auto Plant (Honda), located at 2755 North Michigan Avenue, Greensburg, Indiana.

Background

The Honda Development and Manufacturing of America, LLC—Indiana Auto Plant (Honda) is located in Greensburg, Indiana. The City of Greensburg runs a Federally approved pretreatment program. The City is the Control Authority for Honda, as defined in 40 C.F.R. § 403.3(f). The Indiana Department of Environmental Management (IDEM) does not run an approved State pretreatment program. Therefore, the U.S. Environmental Protection Agency is the Approval Authority for the State of Indiana, as defined in 40 C.F.R. § 403.3(c).

Facility Entry

On September 12, 2023, at approximately 2:00 p.m., Messrs. Ellens and Forth met Ms. Armacost and Sandlin outside the Honda facility, then entered the facility together. Ms. Heath greeted EPA and IDEM staff. EPA staff presented their credentials to Ms. Heath, then Ms. Heath took EPA and IDEM staff into the facility.

Plant walkthrough

Ms. Heath led EPA and IDEM staff to the Main Building, Paint Area. There, Mr. Bauawa and Ms. Hooton joined the group. Later, Mr. Nelson joined the group during the walkthrough. Honda staff stated that the facility was constructed 2008 and 2009. Honda staff showed EPA and IDEM staff the following:

- Paint Area
 - Paint process (Attachment I, Photos 1 to 5)
 - Vehicle bodies are conveyed through a series of stages--spray booths or dip tanks. Stages include rinsing, degreasing, conditioning, phosphating, and electro-coating.
 - A “cleaner sump” collects process wastewater discharged from rinsing, and degreasing stages.
 - A “phosphate sump” collects process wastewater discharged from conditioning, phosphating, and rinsing stages.
 - An “e-coat sump” collects overspray from the electrocoating process. Paint that does not adhere onto the vehicle body is captured and reused in a closed-loop system.
 - Sludge Pits (Attachment I, Photos 7 and 8)
 - Waste paint from the electrocoating process is discharged to the sludge pits.
 - There are two sludge pits (solvent-borne and water-borne).

- Solids from the sludge pits are disposed (hauled to a landfill) once every seven to ten days. The facility generates one roll-off container of sludge every seven to ten days. The solid waste is classified as “DOT-hazardous.” It is not “EPA-hazardous.”
- Process wastewater generation
 - Honda discharges about 250,000 gallons per day (Two shifts, 125,000 gallons per shift). Of this discharge:
 - The solvent-borne sludge pit comprises 10,000 gallons of wastewater per day.
 - The water borne sludge pit comprises 15,000 gallons of wastewater per day.
 - The facility also generates de-humidification water; this water is also wasted.
- Wastewater Treatment Plant (Attachment I, Photos 9 to 23)
 - Honda uses a contractor (Midwest Environmental) to run its wastewater treatment plant (WWTP). Will Spencer, from Midwest Environmental, joined the group during the tour of the WWTP,
 - The WWTP treats process wastewater in batches.
 - The WWTP runs two shifts:
 - 6:30 a.m. to 3:00 p.m. and
 - 4:30 p.m. to 1:00 a.m.
 - The wastewater residence time is 15 hours.
 - WWTP process:
 - Three Batch Treatment Tanks (parallel)
 - Each tank has a 170,000-gallon capacity.
 - Staff add aluminum chloride, calcium chloride, and sulfide carbonate.
 - Air diffusers are in each tank.
 - Lamella Clarifier
 - Polymer is added to the clarifier inlet.
 - A de-foamer tube is positioned at the clarifier outlet.
 - Staff monitors the bottom of the clarifier, and wastes sludge as necessary, to maintain a three-foot sludge blanket in the clarifier.
 - At the time of the inspection, the clarifier was not operating. However, Honda staff ran a batch of wastewater through the clarifier, at the request of the inspection team. Turbulence at the clarifier inlet caused the wastewater to foam. De-foamer (from the tube at the clarifier outlet) dripped into the outlet very slowly.
 - Final Discharge Tank
 - The Final Discharge Tank has a 250,000-gallon capacity.
 - The discharge rate is about 275 to 320 gpm.
 - Filter Press
 - The WWTP generates a roll-off container of sludge every two to three weeks.
 - Categorical Sample Point

- Honda staff collects compliance samples every June and December at the compliance sample point.
- An automatic sampler is used to collect samples at this location.
- Honda staff monitors its discharge against categorical limits at the compliance sample point.
- At the time of the inspection, there was no thermometer inside the sample refrigerator.

Requests for Information

Before leaving the WWTP, the inspection team requested the following documents:

- Process flow diagrams (for Honda's process line and WWTP);
- Safety Data Sheets for chemicals used in Honda's process line; and
- Monthly self-monitoring reports from April 2023 to the present.

The inspection team left the Honda facility at 5:20 p.m.

Control Authority sample point (Attachment I, Photos 24 to 27)

At 5:40 p.m., Honda staff showed the inspection team the Control Authority sample point. The sample point is located outside the facility campus, at a lateral connecting to the sewer.

- An automatic sample is used to collect samples at this location.
- The temperature reading on the thermometer inside the automatic sampler was 6.2°C.
- The automatic sampler gave the following read-out: "Change sample tube." The sample tube appeared to be discolored inside.
- Honda staff clarified that total toxic organic (TTO) pollutant sampling is conducted at the categorical sample point.

Documents Provided After the Inspection

Mr. Nelson provided the following documents in a September 21, 2023, email:

- Safety Data Sheets for materials in the Paint Pretreatment Operations (Cleaning, Phosphate and E-coat)
- Wastewater Analytical Data since April 2023
- Monthly Wastewater Compliance Reports
- Process Flow Diagrams

Areas of Concern

- During the inspection, inspection team members saw foam in wastewater entering the lamella clarifier. On September 13, 2023, inspection team members also saw foam in wastewater discharging from the Greensburg POTW (Attachment II and III).
- At the time of the inspection, there was no thermometer inside the sample refrigerator at the categorical sample point.
- The automatic sampler at the Control Authority sample point gave the following read-out: "Change sample tube." The sample tube appeared to be discolored inside.

- A June 28, 2023, sample analysis report (Attachment VI) includes some, but not all, results for total toxic organics (TTO) as defined under 40 C.F.R. § 433.11(e). Results for the following TTO appear to be missing:
 - Acenaphthene
 - Benzidine
 - 1,2,4-Trichlorobenzene
 - Hexachlorobenzene
 - Hexachloroethane
 - Bis (2-chloroethyl) ether
 - 2-Chloronaphthalene
 - 2,4,6-Trichlorophenol
 - Parachlorometa cresol
 - 2-Chlorophenol
 - 3,3-Dichlorobenzidine
 - 2,4-Dichlorophenol
 - 2,4-Dimethylphenol
 - 2,4-Dinitrotoluene
 - 2,6-Dinitrotoluene
 - 1,2-Diphenylhydrazine
 - Fluoranthene
 - 4-Chlorophenyl phenyl ether
 - 4-Bromophenyl phenyl ether
 - Bis (2-chloroisopropyl) ether
 - Bis (2-chloroethoxy) methane
 - Hexachlorobutadiene
 - Hexachlorocyclopentadiene
 - Isophorone
 - Naphthalene
 - Nitrobenzene
 - 2-Nitrophenol
 - 4-Nitrophenol
 - 2,4-Dinitrophenol
 - 4,6-Dinitro-o-cresol
 - N-nitrosodimethylamine
 - N-nitrosodiphenylamine
 - N-nitrosodi-n-propylamine
 - Pentachlorophenol
 - Phenol
 - Bis (2-ethylhexyl) phthalate
 - Butyl benzyl phthalate
 - Di-n-butyl phthalate
 - Di-n-octyl phthalate
 - Diethyl phthalate
 - Dimethyl phthalate
 - 1,2-Benzanthracene
 - (benzo(a)anthracene)

- Benzo(a)pyrene (3,4-benzopyrene)
- 3,4-Benzofluoranthene (benzo(b)fluoranthene)
- 11,12-Benzofluoranthene
- (benzo(k)fluoranthene)
- Chrysene
- Acenaphthylene
- Anthracene
- 1,12-Benzoperylene (benzo(ghi)perylene)
- Fluorene
- Phenanthrene
- 1,2,5,6-Dibenzanthracene
- (dibenzo(a,h)anthracene)
- Indeno(1,2,3-cd) pyrene (2,3-o-phenylene pyrene)
- Pyrene
- Aldrin
- Dieldrin
- Chlordane (technical mixture and metabolites)
- 4,4-DDT
- 4,4-DDE (p,p-DDX)
- 4,4-DDD (p,p-TDE)
- Alpha-endosulfan
- Beta-endosulfan
- Endosulfan sulfate
- Endrin
- Endrin aldehyde
- Heptachlor
- Heptachlor epoxide
- (BHC-hexachlorocyclohexane)
- Alpha-BHC
- Beta-BHC
- Gamma-BHC
- Delta-BHC
- (PCB-polychlorinated biphenyls)
- PCB-1242 (Arochlor 1242)
- PCB-1254 (Arochlor 1254)
- PCB-1221 (Arochlor 1221)
- PCB-1232 (Arochlor 1232)
- PCB-1248 (Arochlor 1248)
- PCB-1260 (Arochlor 1260)
- PCB-1016 (Arochlor 1016)
- Toxaphene
- 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)

ATTACHMENTS

- I. Honda Development and Manufacturing of America LLC—Indiana Auto Plant—Photos of the September 12, 2023, Inspection
- II. Greensburg Publicly-Owned Treatment Works—Photos of September 13, 2023, Site Visit
- III. Surfactant Test Photos, taken by the Greensburg Publicly-Owned Treatment Works
- IV. Surfactant Test Results from the Greensburg Publicly-Owned Treatment Works
- V. Greensburg Publicly-Owned Treatment Works—Photos of the September 13, 2023, Site Visit
- VI. June 28, 2023, Element Sample Analysis Results