U.S. Environmental Protection Agency Region 5

Purpose: Industrial User Pretreatment Compliance Inspection

Facility: Manasek Acquisition Company, LLC d/b/a Warner Bodies
11700 North SR37
Elwood, Indiana 46036

Inspection Date: April 14 and 15, 2021

EPA Representatives:

Rajen Patel, Environmental Engineer, 312-886-5741
Benjamin Atkinson, Environmental Scientist, 312-353-8243

Facility Representatives:

Richard Manasek, CEO - Chairman, 765-551-1600
Craig Longstreth, President, 765-551-1600
Brian Lapp, Chief Financial Officer & Water Compliance Manager, 765-551-1600
Rick Roudebush, Purchasing Manager, 765-551-1600
Anthony Henley, Compliance Manager, August Mack Environmental, 317-916-3147
Justen Stutz, Wastewater Operator, August Mack Environmental, 317-522-6527

Report Prepared by:

Rajen Patel
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Inspector Signature and Date: RAJEN PATEL Digitally signed by RAJEN PATEL Date: 2021.06.14 10:11:22 -05'00'

Approver Name and Title: Ryan Bahr, Chief, Section 2
Water Enforcement and Compliance Assurance Branch

Approver Signature and Date: MOLLY SMITH Digitally signed by MOLLY SMITH Date: 2021.06.14 13:51:30 -05'00'

BACKGROUND

The purpose of the inspection was to describe, evaluate, and document compliance with the Clean Water Act (CWA) and associated pretreatment regulations with respect to the Manasek Acquisition Company, LLC d/b/a Warner Bodies (Manasek), facility located at 11700 North SR37 Elwood, Indiana 46036 (the facility).

There are two defined entities (Approval and Control Authority) that have the responsibility to develop and implement the federal pretreatment program.

An Approval Authority is either the Director of a National Pollutant Discharge Elimination System (NPDES) authorized state with an EPA-approved pretreatment program or the EPA Regional Administrator in a state without an approved pretreatment program. A Control Authority is either a Publicly Owned Treatment Works (POTW) with an approved pretreatment program or the Approval Authority for a POTW without an approved program.

The State of Indiana and the City of Elwood POTW do not have an EPA-approved pretreatment program. Hence EPA is both the Approval Authority and Control Authority in the state of Indiana. As a "Control Authority" in Indiana, EPA has enforcement authority pertaining to the federal pretreatment requirements at Manasek. The facility discharges into the City of Elwood POTW.

EPA has developed nationally applicable Categorical Pretreatment standards under CWA. New source metal finishing operations [40 CFR 433.17] are the applicable Categorical Pretreatment Standards for the facility operation. The standards are concentration-based (mg/l).

Under the state only pretreatment program, the Indiana Department of Environmental Management (IDEM) also issued Industrial Wastewater Pretreatment (IWP) Permit INP000662. The current permit is valid through May 31, 2026.

SITE INSPECTION

Opening Conference

EPA representatives entered the facility at 12 noon on April 14, 2021. We signed in at the reception desk and proceeded to the opening conference. We were greeted by the facility representatives Richard Manasek, CEO - Chairman, Craig Longstreth, President, Brian Lapp, Chief Financial Officer & Water Compliance Manager. Mr. Lapp also introduced us to their environmental consultants, Mr. Anthony Henley and Justen Stutz of August Mack Environmental. The EPA inspection team presented its credentials to the facility representatives and began the opening conference at 12:30 pm. I explained to the representatives that EPA was performing the CWA compliance evaluation inspection of the facility operations and we would evaluate its wastewater discharges and take photos during the inspection. I also mentioned that confidential business information (CBI) may be declared for materials reviewed during the inspection. Mr. Manasek stated that his staff would let me know during the course of inspection if a given business information (shared with EPA) is deemed confidential in nature. I did not receive any request for CBI from the facility during the inspection. I informed the Manasek

representatives that they would receive copies of the photographs collected during the inspection as an attachment to the inspection report. The opening conference began with general questions about the facility's background, manufacturing processes, any applicable wastewater treatment process, and compliance reporting history. Mr. Lapp stated that the facility has retained the services of August Mack Environmental Company to address the ongoing 40 CFR 433.17 effluent standard exceedances for Zinc and Total Toxic Organics (TTO).

Facility Background

I asked Mr. Manasek about the nature of products and the company's history of operations. He stated that Warner Bodies has been manufacturing utility truck bodies, rescue vehicles and custom trucks in Noblesville, Indiana for over half a century. During the company's early years, Warner Bodies manufactured specialized van bodies for the sales and service industries. Eventually, Warner Bodies expanded to include service bodies, custom utility bodies and fire and rescue vehicles. Warner Bodies products are found in construction, utilities, state and local government, small business, and fire departments.

Purchased in March 2010, by Manasek Acquisition Company, LLC, Manasek continued to operate the Noblesville plant as Warner Bodies with the same manufacturing operations of producing a wide variety of standard and custom truck bodies. In 2013, Warner Bodies acquired a 250,000 square foot facility in Elwood, Indiana to facilitate the growth for the company. After extensive renovations and preparations, the move from Noblesville to Elwood was completed in June of 2014.

Process Description

The facility manufactures a wide variety of standard and custom truck bodies, such as utility/service trucks, crane trucks, haulers, fire/rescue trucks, and brush trucks. The primary raw material is sheet metal. Once received, the metal is cut, welded, polished, and/or stamped into the customer specified configuration. Either as a fabricated product or during different steps of the fabrication, the product may be coated using a spray coating operation or a powder coating operation. The painted product is then dried in drying ovens. MEK (methyl ethyl ketone) and acetone are used to wipe down solvent cleaning operations. To prepare the product for shipment, the product may be washed in the wash bay with the wash waters and then discharged to the City of Elwood POTW.

Truck bodies constitutes about 95% of the facility's operation. In January of 2008, Warner Bodies purchased Langsenkamp food processing equipment. The facility has a small production area (and one staff) dedicated for the assembly of new equipment and to conduct repairs on pulpers, finishers, coils, and other parts of the food processing equipment.

Manasek is classified under Standard Industrial Classification (SIC) Code 3713 – Truck and Bus Bodies. An aerial map showing the aerial view of the entire facility and its location is attached (Attachment I).

Mr. Lapp stated that Manasek operates one 8-hour shift per day, five days a week, with no scheduled shutdowns for maintenance and process modifications. Mr. Lapp added that 102

employees work at the facility and their production remains steady for the most part throughout the year. Mr. Lapp provided the hard and soft copies of the following during the inspection:

1. Plant Layout (Attachment III)
2. Paint Process and Prep/Wash Flow Diagram (Attachment IV)
3. Wastewater Pre-treatment (zinc) Diagram & Wash and Paint Area Map (Attachment V)

Facility Walk-Through

We began the tour at 9:20 am on April 15, 2021. Facility representatives Mr. Manasek, Mr. Longstreth, and Mr. Lapp joined us for the entire portion of the site tour on April 15, 2021. Mr. Henley and Mr. Stutz of August Mack Environmental were also present during the entire tour.

Mr. Lapp first escorted us to the material intake area on the northeast side of the facility (photo 1). Raw steel and aluminum are received (via trucks) in this area. I asked Mr. Lapp about the approximate composition of the raw material processed annually. Mr. Lapp mentioned that it is about 90% steel (the average over the last two years is 1200 tons) and 10% aluminum (the average over the last two years is 150 tons).

The inspection continued to the Laser cutting machine with an automatic feeder having 10 magazines. Each magazine feeds an average of 3,300 pounds of steel for the laser cutting designed for that specific magazine (photo 3). An average of 3,300 pounds of steel fits into one magazine. Once all 3,300 pounds of steel is laser cut, additional steel is fed in the magazine as per desired production needs. We noticed that four 55-gallon drums of hyrdaulic oil and hydraulic fluid (photo 4-6) were stored on a wooden crate. The hydraulic oil and hydraulic fuid are non-compressible fluids that are used to transfer power within hydraulic machinery and equipment. We did not observe any floor drains in this area.

We then proceeded to inspect the newly installed deburring machine used for smoothing the metal sheets (photo 2). This machine is equipped with a dust collection system designed to further remove fine metal particles formed as a result of deburring. Mr. Lapp stated that the dust collection is also expected to capture and reduce the amount of zinc from the recently cut metal sheets and hence it would reduce zinc loading in the facility wastewater prior to pretreatment. The facility stopped using the sandblasting machine they used in the past and installed the deburring machine for effective smoothing and capturing fine metal particles from entering the environment.

We then proceeded to inspect an area adjacent (just north of the deburring machine) where we noticed two empty deionized (DI) water containers (blue barrels) and four dust collection metal barrels (photo 7). Rick Roudebush, the facility's purchasing manager, joined us briefly to explain the purpose and quantity of the DI water use. He stated that the DI water is used to cool (non-contact cooling) the resonators in the laser cutting machine. The Facility buys the DI water in 55-gallon drums and uses an average of 1.5 to 2 drums of the DI water annually. Mr. Lapp explained that the 55-gallon size metal barrels are used to collect dust and fine scrape materials, which are hauled off site once a quarter.

Mr. Lapp escorted us through the next process steps of preparing the laser-cut metal sheets in various shapes based on the product specifications. Laser-cut metal sheets undergo bending in the Pressbrake (White Truebend machine) and power folding (green machine photo 8). We continued our tour as we walked by the welding and assembly area (photos 9 & 10), body work area (photo 11), and dust collection booth (photos 12 & 13).

We asked Mr. Lapp to show us the process wastewater connection to the sewer line (photo 14). We noticed a pipe coming through the western wall and joining sewer line (photo 15). That pipe is connected to the sink on the west side of the wall (photo 16). Mr. Lapp stated that the facility staff use that sink to wash their hands during breaks and at the end of their shift.

The inspection continued towards the central part of the facility to inspect the undercoating area (photo 17) where solvent based asphalt undercoating is performed on all of the painted truck bodies. The asphalt undercoating material is stored in a large self-containing tote (photos 22 & 23). Depending upon the product specifications, the parts are either sent to the wet paint area B1 (photo 18) or the powder coating area (photo 19). Both wet and powder coating areas are located adjacent to the undercoating area (immediate south). We did not observe any floor drains in the undercoating or painting operation. We did see a dry floor drain by the exterior door west of the undercoating area (photos 24 & 25). We asked and Mr. Lapp verfied that the floor drain is dry and it is not connected to the sewer.

We proceeded to the parts washing area (photos 26 & 44). Mr. Lapp stated that the round floor drain south of the parts washing area (photo 27) and the main floor drain colleting all the wash water from the parts washing area (photo 28) drains to the underground holding tanks covered by a storage shed located immediately west of the washing area (on the outside). There was an eye wash station on the west side of the west wall of the parts washing area (photo 30). There was also a capped pipe protruding into the parts washing area (photo 29).

We continued the tour to inspect the materials used for the washing operation. The washing area staff first applies the degreaser with the use of a blue tank sprayer (photo 34) on the body parts brought into the wash area, followed by etching/wash conditioner (photo 33) and ending with water rinse and applying the conversion coating spray (photo 32). The coil conditioner and coating chemicals are stored in white 55-gallon plastic drums on a large (yellow) spill-containment tote (photo 31) that can store four such drums. Mr. Henley mentioned that the degreaser could be the single largest souce of "toluene" causing the facility's TTO exceedances. He stated that he is looking into alternative degreasers without the toluene as an ingredient.

To the west of the wash area is an open room for storing wash chemicals, wastewater pretreatment chemicals, a sampling cart with sampling related supplies, and a paint mixing area. The wastewater pretreatment chemicals are stored in 55-gallon plastic drums on a large (yellow) spill-containment tote (photos 36 & 37). In the same area, we noticed that a pH log (photo 39) is kept on a large log sheet hanging on the wall clearly visible in the control room area. We noticed a sampling cart housing the sampling materials (photo 40), a pH meter calibration kit, a pH 7 buffer used for calibration. We asked and Mr. Lapp confirmed that the facility only uses one buffer for pH calibaration and the bottle had expired (January 2020) pH probe calibration buffer solution (photo 41). Mr. Lapp mentioned that the faclity had hired Cimbrean Environmental Engineering in the summer of 2018 to address the zinc exceedances and later to comply with

IDEM's February 2019 enforcement order to pretreat zinc to meet IDEM's permit limit. IDEM's enforcement order also required Manasek to pretreat TTO to meet IDEM's permit limit.

The inspection continued towards the wastewater treatment system located outside the building (adjacent to the wall behind wash and paint area). Mr. Lapp stated that the discharge from Outfall 001 consists of treated process wastewater from the zinc treatment system. Mr. Lapp also mentioned that the facility installed the zinc removal system by July 2019. Wastewater for this facility is generated in the wash bay during the cleaning of truck bodies after they are manufactured. Wastewater from the wash bay drains through a floor drain into first and second stage pretreatment tanks (left to right – photo 42). The wastewater is treated with sodium hydroxide to precipitate out the zinc in the wastewater. Sodium hydroxide is added to the underground mixing and settling tank (left tank in photo 42). The wastewater then flows through two settling tanks to allow the zinc hydroxide precipitate to settle out of the wastewater. The wastewater then flows to a pH adjustment tank (second underground storage tank) where sulfuric acid is added to adjust the pH. The chemical feed pumps and controllers (photo 38) regulate the feed rate of sodium hydroxide and sulfuric acid to the wastewater treatment tanks. Treated wastewater then flows to a chamber with a pump and float system (photo 43). When the high-level float is tripped, wastewater is pumped out, sampled, and discharged to the sewer system. The outfall has an average discharge of approximately 1200 GPD. Outfall 001 is located after the wash bay and prior to the discharge into the sewer.

At the time of the visit, the facility did not have any mechanism in place to collect 24-hour flow based composite samples for the metal sample analysis as required by 40 CFR 403.12(g)(3). Mr. Lapp stated that the facility has only used the "grab" sampling method to collect wastewater sampling to date. Grab water samples are collected from the discharge sampling spigot (photos 46 & 47) prior to discharge from outfall 001. The discharge spigot is located just above the discharge flow meter (photo 45). The discharge pipe is routed close to the ceiling of a room south of the parts washing area (photos 48 & 49).

The inspection continued to the side of the wet paint booth where we noticed a 55-gallon metal drum (photos 50-52) of lacquer thinner (cleaner). Mr. Lapp stated that the cleaner is used to clean paint equipment (photo 53). Spent cleaning liquid is collected in waste drums, which are hauled off site quarterly (photos 54 & 55). Storage for back up of chemicals used in the facility operations is located in the northwest corner of the western portion of the facility (photo 56) – where the 55-gallon drums are placed on wooden crates. I asked Mr. Lapp if the facility has had any such product spillage in the facility and he confirmed that the facility has not had any spill since it opened in 2014.

Mr. Lapp showed us the finished product assembly (photo 57) area located south of the bedliner area on the western part of the building. Mr. Lapp showed a recently purcharsed multi-stage parts washer (not yet installed - photos 58-60) for washing small to midsize truck body parts. He stated that the parts washer has separate stages designed to wash, collect and recycle (for multiple uses) the spent washing liquid from the parts washing operation with eventual off site disposal of all spent washing liquid. Mr. Lapp mentioend that the washer would cut back on the total amount of wash water discharge to the sewer significantly and reduce the zinc and TTO levels in the wastewater. He stated that the washer is expected to be in operation by fall of this year.

We continued the inspection towards the southwest portion of the facility where we observed the shipping area (photo 61) and custom fire truck bodies assembly area (photo 63). Mr. Manasek escorted us to a small production area dedicated for the assembly of new food processing equipment and to conduct repairs on pulpers, finishers, coils, and other parts of the food processing equipment (photo 62). There are no floor drains in this portion of the building.

We noticed one drain south of the powder coating area (photo 64). Mr. Lapp confirmed that the drain is non-functional and it is not connected to the sewer. We also noticed a small bucket of black paint and acetone in the bedliner area ((photo 65). Mr. Lapp mentioned that the black paint and acetone are used in small quantities for the fire truck bodies.

Stormwater: We did not observe storage of any materials outside the facility. The facility's SIC code is 3713. IDEM's Industrial Stormwater 327 IAC 15-6 (Rule 6) applies to facilities described by one or more of the Standard Industrial Classification (SIC) Codes and/or meet specific activity categories including "33xx - Primary metal industries"; "34xx - Fabricated metal products"; "35xx - Industrial machinery and equipment"; and "37xx-Transportation equipment." (https://www.in.gov/idem/stormwater/industrial-storm-water-permitting/applicability/). I asked Mr. Lapp if the facility has applied for any stormwater permit with IDEM or has any stormwater documentation. Mr. Lapp stated that the facility does not have any stormwater related requirements nor documentation in place.

After completing the facility walk-through portion of the inspection, Mr. Lapp escorted us to the office meeting room for the closing conference.

Closing Conference

We began the closing conference at noon. Mr. Manasek, Mr. Longstreth, Mr. Lapp, Mr. Henley, and Mr. Stutz attended the closing conference. We discussed the following areas of concern:

1. *Continued Effluent Exceedances of Zinc and TTO:* Review of the Discharge Monitoring Reports (DMR) records for the period November 2016 to December 2020 revealed effluent limitation exceedances and reporting concerns. New source metal finishing operations at your facility are subject to the pollutant specific performance standards specified in 40 CFR 433.17. The standards are concentration-based (mg/l). Please refer to attachment VI for details.

    a. The daily maximum and monthly average for zinc was exceeded during November and December 2016, February through December 2017, January through December of 2018, January through December of 2019, and January through December of 2020.

    b. The daily maximum and monthly average for TTOs were exceeded during December 2016, December 2017, June and December 2019, and December 2020.

2. *TTO Reporting Discrepancies – DMR Vs. Lab Results*: TTO is the summation of all quantifiable values greater than 0.01 mg/l for toxic organics listed in 40 CFR 413.02(i) and 40 CFR 433.11(e). As required under 40 CFR 433.17, TTO values shall not exceed the daily maximum of 2.13 mg/l. During our review of the facility's DMR records, we noted that the facility had incorrectly reported the summation of TTO analysis for November 2016, December 2017, June and December 2019, and December 2020 in its DMR submissions. Please refer to attachment VII for details.

3. *Sampling:* 403.12(g)(3) requires the facility to obtain 24-hour composite samples through flow-proportional composite sampling techniques, unless time-proportional composite sampling or grab sampling is authorized by the Control Authority. I asked and Mr. Lapp confirmed that the facility does not collect a "24-hour composite sample" consisting of at least 3 individual flow-proportional samples of wastewater, consisting of aliquots withdrawn throughout the 24-hour discharge period.

4. *Operator Certification:* The IDEM permit requires Manasek to only operate its wastewater treatment facilities under the responsible charge of an operator with qualifications established in 327 IAC 5-22-7. At the time of the inspection, the facility did not have a certified operator. Mr. Lapp stated that the facility is in the process of hiring a certified operator.

5. *pH buffer solution:* The facility only uses one buffer (pH 7 buffer) for pH calibaration and the bottle had expired (January 2020) pH probe calibration buffer solution. The facility is requied to have at least three pH probe calibration buffer solutions that are not expired.

6. *Stormwater:* The facility's SIC code is 3713. IDEM's Industrial Stormwater 327 IAC 15-6 (Rule 6) applies to facilities described by the Standard Industrial Classification (SIC) Code "37xx -Transportation equipment." The facility does not have any stormwater documentation in place. This finding and the area of concern was not discussed during the closing conference.

We ended the closing conference and departed the facility at 1:45 pm.

List of Attachments

I. Inspection photographs
II. Aerial view of the facility
III. Plant Layout
IV. Paint Process and Prep/Wash Flow Diagram
V. Wastewater Pre-treatment (zinc) Diagram & Wash and Paint Area Map
VI. 40 CFR 433.17 Effluent Exceedances History
VII. TTO Reporting Discrepancies– DMR Vs Lab Results

Manasek Acquisition Company, LLC d/b/a Warner Bodies
EPA Inspection April 14th - April 15th, 2021
All photos taken by Benjamin D. Atkinson, Enforcement Officer, U.S. EPA
Camera: RICOH WG-4 GPS

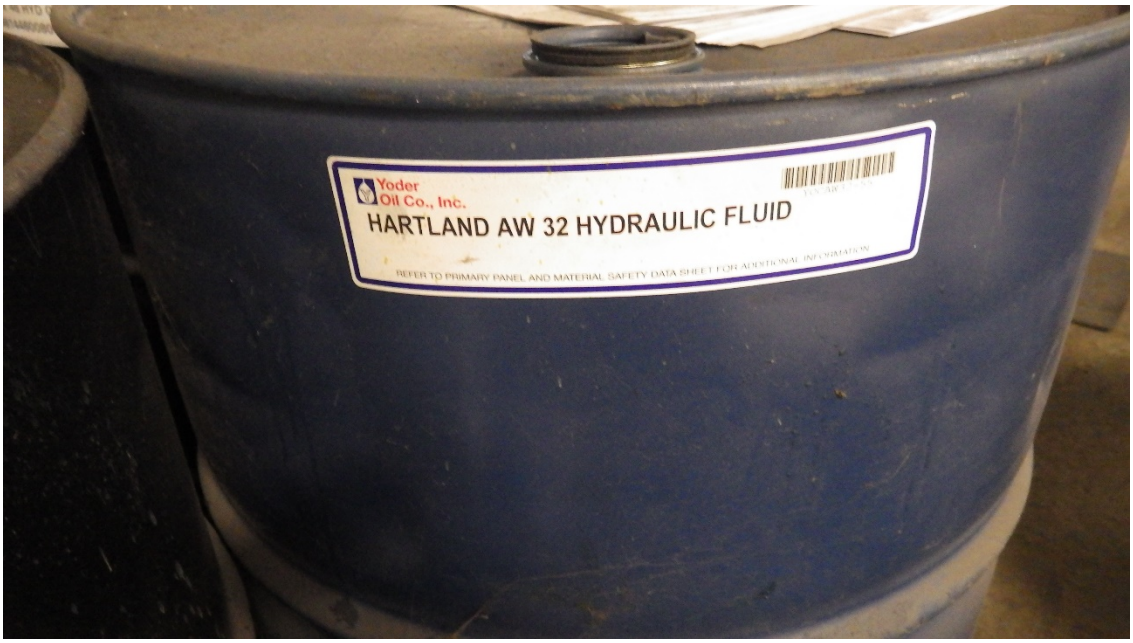
1: RIMG0001
Description: Facing west along the material intake area on the northeast side of the facility.
Location: Northeast corner of facility.
Camera Direction: West
Date/Time: April 15, 2021 9:30 AM EST

2: RIMG0002
Description: Newly installed deburring machine with dust collection. Facility representatives stated that they hoped the dust collection would reduce zinc loading in wastewater.
Location: Northwest corner of the east part of the facility.
Camera Direction: Northwest
Date/Time: April 15 2021 9:34 AM EST

3: RIMG0003
Description: Laser cutting machine with an automatic feeder.
Location: Northwest corner of the east part of the facility.
Camera Direction: Southeast.
Date/Time: April 15 2021 9:37 AM EST

4: RIMG0004
Description: Hyrdaulic Oil in 55 gallon drums.
Location: North end of the east side of the facility.
Camera Direction: Northeast.
Date/Time: April 15 2021 9:44 AM EST

5: RIMG0005
Description: Hyrdaulic Oil in 55 gallon drums.
Location: North end of the east side of the facility.
Camera Direction: Northeast.
Date/Time: April 15 2021 9:44 AM EST



6: RIMG0006
Description: Hyrdaulic Oil in 55 gallon drums.
Location: North end of the east side of the facility.
Camera Direction: Northeast.
Date/Time: April 15 2021 9:44 AM EST

7: RIMG0007
Description: Empty Deionized water containers (blue barrels) and dust collection metal barrels.
Location: North end of the east side of the facility.
Camera Direction: North
Date/Time: April 15 2021 9:47 AM

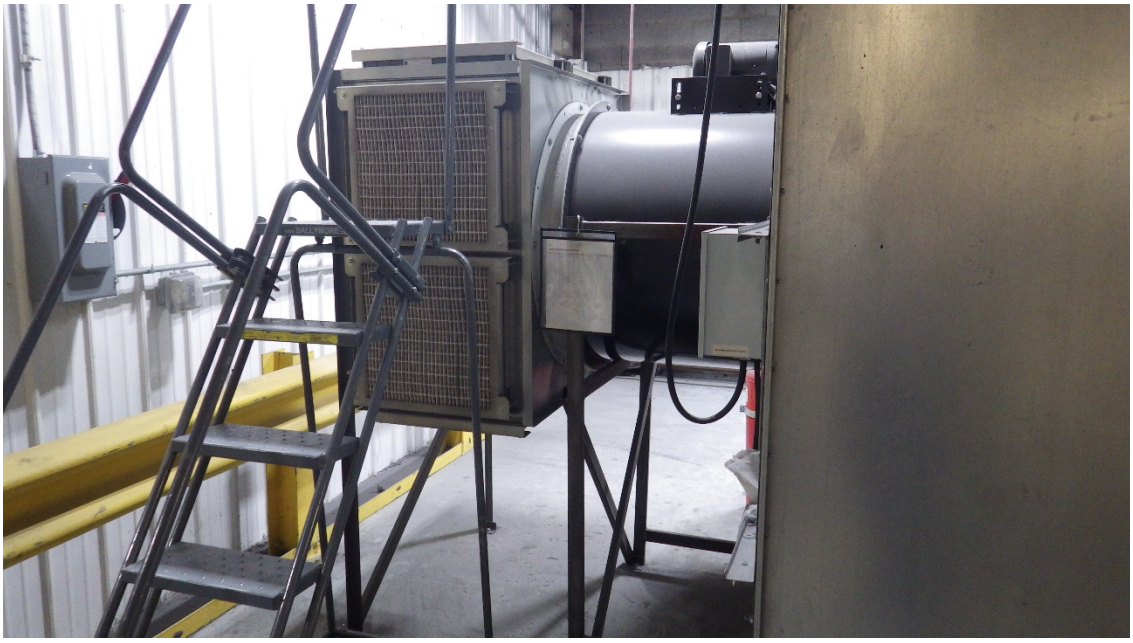
8: RIMG0008
Description: Pressbrake (near) and power folder (green machine in distance).
Location: North end of the east side of the facility.
Camera Direction: East
Date/Time: April 15 2021 9:55 AM EST

9: RIMG0009
Description: Welding and assembly area.
Location: Centrally located in east side of facility.
Camera Direction: Southeast.
Date/Time: April 15 2021 10:01 AM EST

10: RIMG0010
Description: Welding and assembly area.
Location: Centrally located in east side of facility.
Camera Direction: South
Date/Time: April 15 2021 10:02 AM EST

11: RIMG0011
Description: Body work area.
Location: Southern portion of the east side of the facility.
Camera Direction: Southeast.
Date/Time: April 15 2021 10:05 AM EST

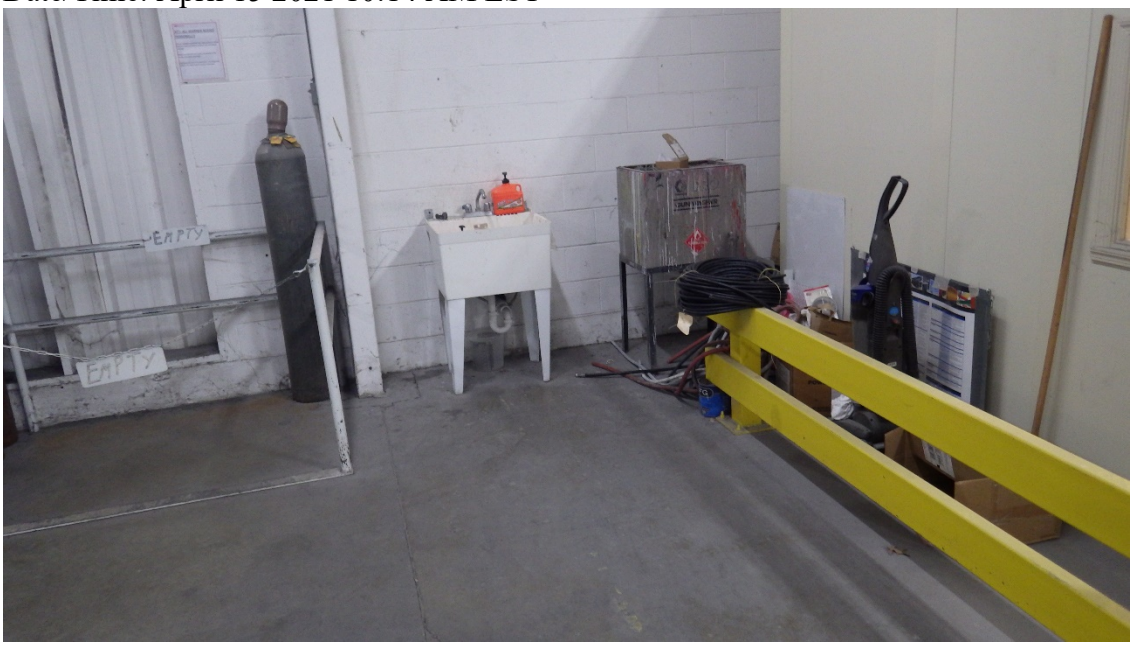
12: RIMG0012
Description: Dust collection with no external vent.
Location: Southwest side of the eastern portion of the facility.
Camera Direction: Southwest
Date/Time: April 15 2021 10:06 AM



13: RIMG0013
Description: Dust collection with no external vent.
Location: Southwest side of the eastern portion of the facility.
Camera Direction: Southwest
Date/Time: April 15 2021 10:07 AM

14: RIMG0014
Description: Processwaster connection to sewer line.
Location: West of restrooms on the south side of the eastern portion of the facility.
Camera Direction: Down
Date/Time: April 15 2021 10:09 AM

15: RIMG0015
Description: Pipe coming through the western wall and joining sewer line.
Location: West of restrooms on the south side of the eastern portion of the facility.
Camera Direction: Down
Date/Time: April 15 2021 10:14 AM EST



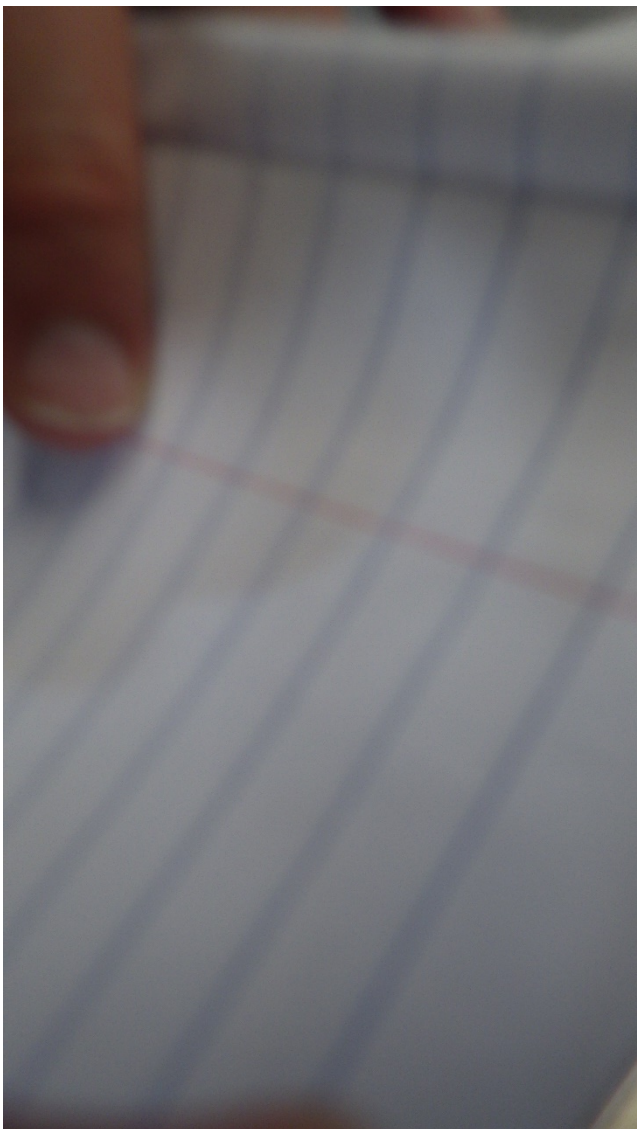
16: RIMG0016
Description: Sink on the west side of the wall seen in photo 15. Source of pipe identified in photo 15.
Location: Northeast corner of the central part of the facility.
Camera Direction: East
Date/Time: April 15 2021 10:16 AM EST

17: RIMG0017
Description: Undercoating area.
Location: North side of the central area.
Camera Direction: West.
Date/Time: April 15 2021 10:17 AM EST

18: RIMG0018
Description: Wet paint area B1, south of undercoating area.
Location: North side of the central area.
Camera Direction: West
Date/Time: April 15 2021 10:20AM EST

19: RIMG0019
Description: Powder Coating area
Location: South side of central area.
Camera Direction: Southwest
Date/Time: April 15 2021 10:21 AM EST

20: RIMG0020
Description: Erroneous photo
Location:
Camera Direction:
Date/Time: April 15 2021 10:21 AM EST



21: RIMG0021
Description: Erroneous photo
Location:
Camera Direction:
Date/Time: April 15 2021 10:21 AM EST

22: RIMG0022
Description: Asphalt based undercoating.
Location: West of undercoating area, east of wash area.
Camera Direction: Northeast
Date/Time: April 15 2021 10:22 AM EST

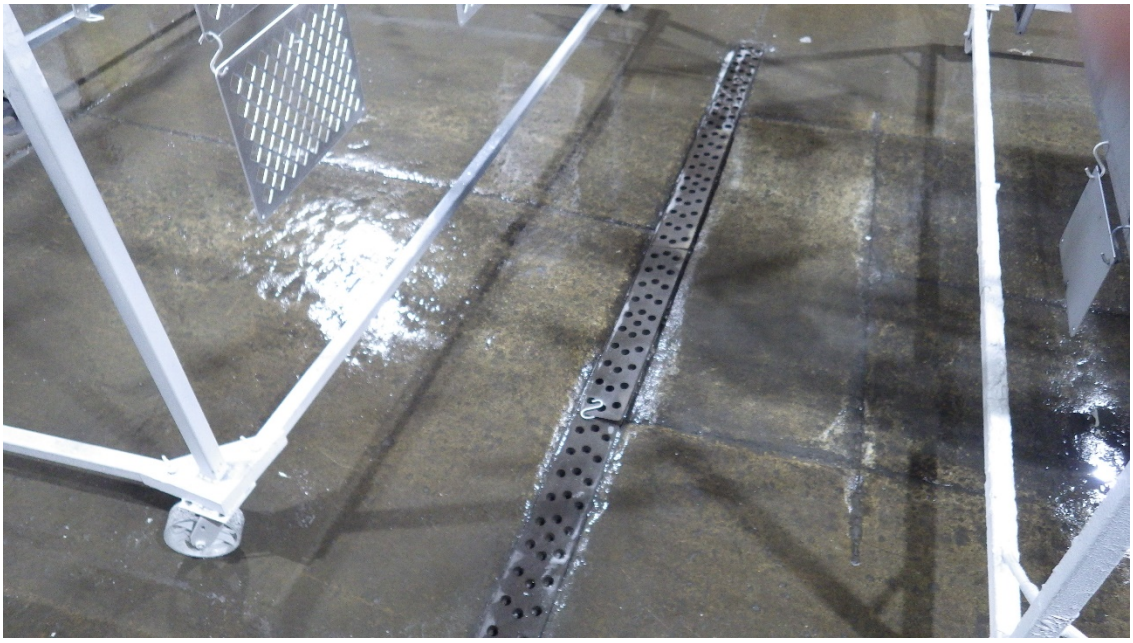
23: RIMG0023
Description: Asphalt based undercoating.
Location: West of undercoating area, east of wash area.
Camera Direction: Northeast
Date/Time: April 15 2021 10:22 AM

24: RIMG0024
Description: Floor drain by exterior door west of undercoating area.
Location: West of undercoating area, east of wash area.
Camera Direction: North
Date/Time: April 15 2021 10:27 AM EST

25: RIMG0025
Description: Floor drain by exterior door west of undercoating area.
Location: West of undercoating area, east of wash area.
Camera Direction: Northeast
Date/Time: April 15 2021 10:28 AM EST

26: RIMG0026
Description: Parts wash area.
Location: North side of the central portion of the facility.
Camera Direction: North
Date/Time: April 15 2021 10:33 AM EST

27: RIMG0027
Description: Round floor drain south of parts wash area.
Location: South of parts wash area.
Camera Direction: Down
Date/Time: April 15 2021 10:34 AM EST



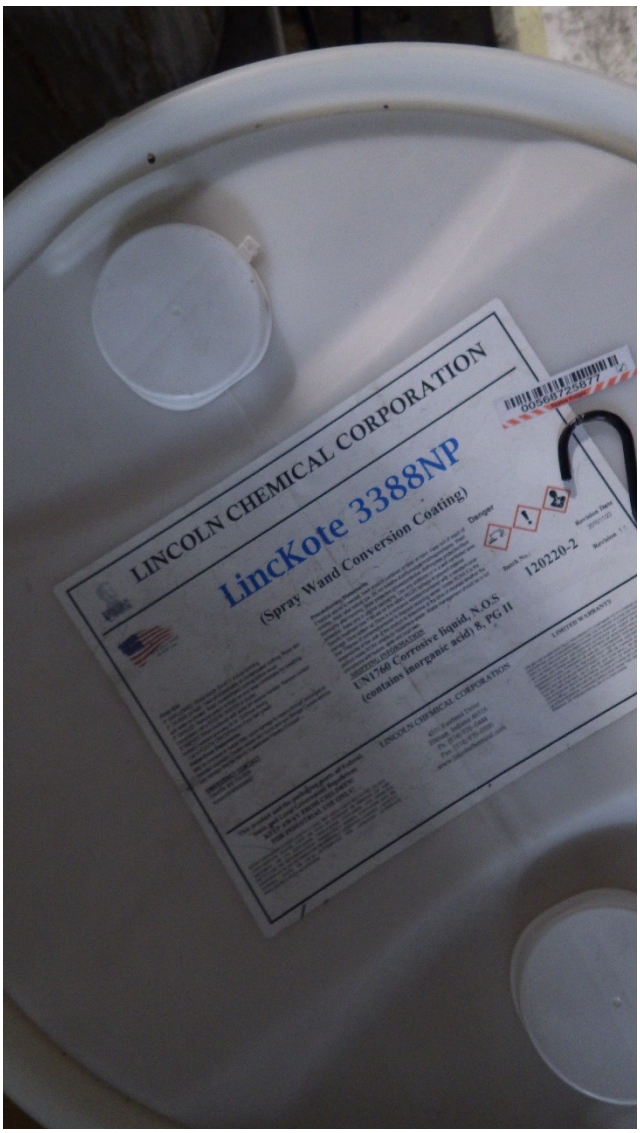
28: RIMG0028
Description: Floor drain in parts wash area.
Location: North side of the central portion of the facility.
Camera Direction: Down
Date/Time: April 15 2021 10:34 AM EST

29: RIMG0029

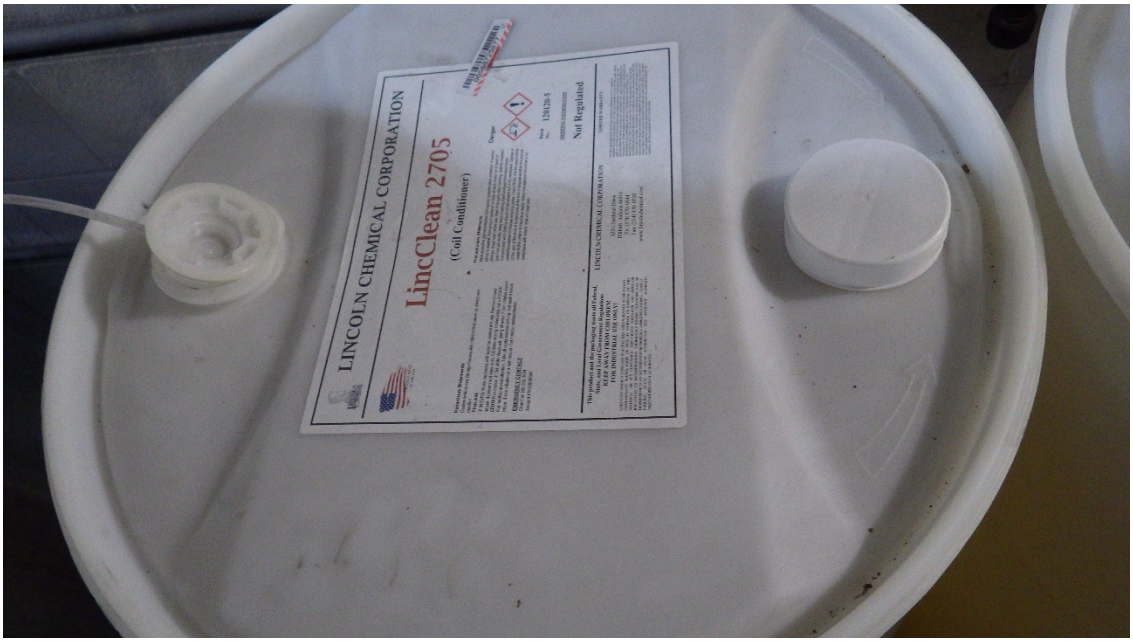
Description: West wall of parts wash area with pipe protruding from the west.
Location: Southwest corner of parts wash area.
Camera Direction: North.
Date/Time: April 15 2021 10:41 AM EST

30: RIMG0030
Description: Eye wash station on west side of the west wall of the parts wash area.
Location: Chemical and control room for wash water and wastewater pretreatment.
Camera Direction: North
Date/Time: April 15 2021 10:41 AM EST

31: RIMG0031
Description: Wash chemicals.
Location: Chemical and control room for wash water and wastewater pretreatment.
Camera Direction: Northwest
Date/Time: April 15 2021 10:45 AM EST



32: RIMG0032
Description: Wash chemicals.
Location: Chemical and control room for wash water and wastewater pretreatment.
Camera Direction: Down.
Date/Time: April 15 2021 10:45 AM

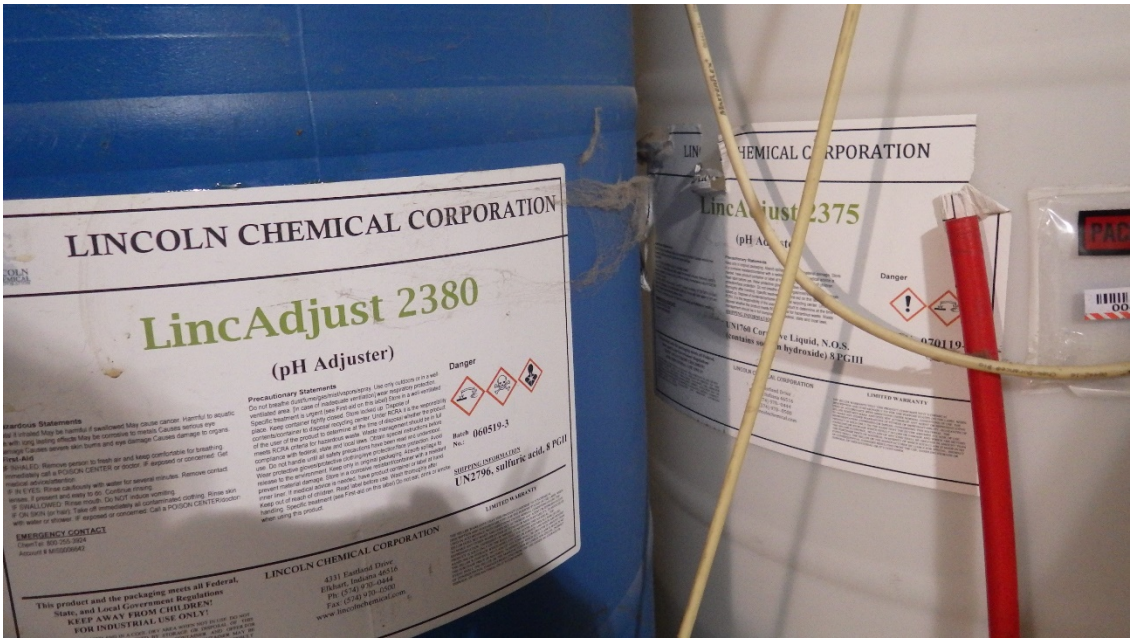


33: RIMG0033
Description: Wash chemicals.
Location: Chemical and control room for wash water and wastewater pretreatment.
Camera Direction: Down.
Date/Time: April 15 2021 10:45 AM EST

34: RIMG0034
Description: Wash chemicals – new degreaser.
Location: Chemical and control room for wash water and wastewater pretreatment.
Camera Direction: Southwest.
Date/Time: April 15 2021 10:46 AM EST

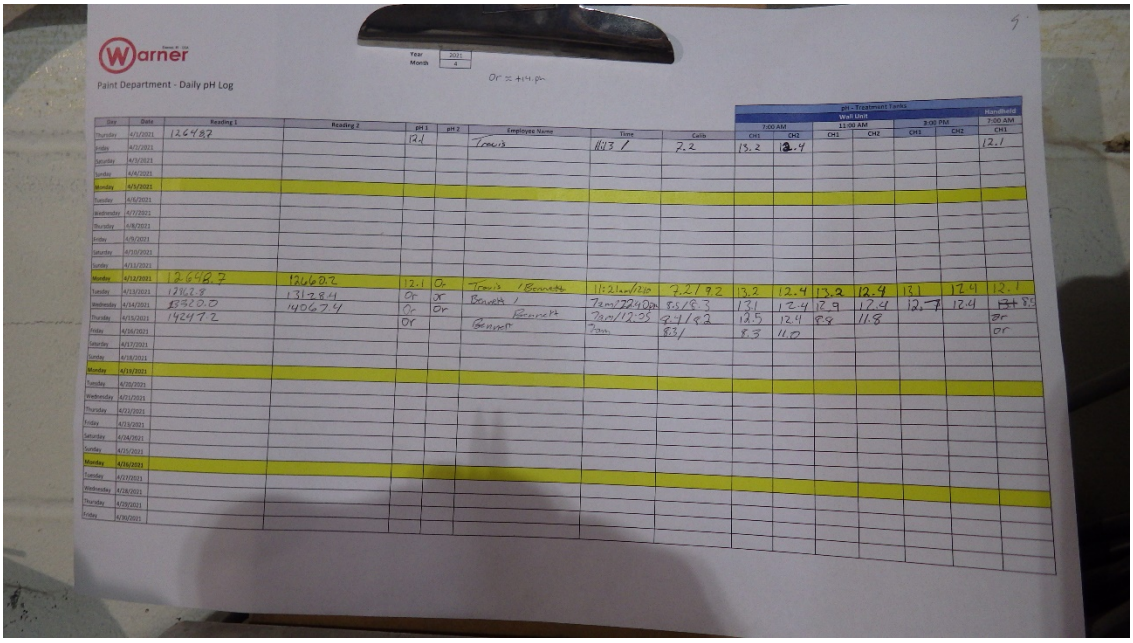
35: RIMG0035
Description: Wash chemicals – new degreaser.
Location: Chemical and control room for wash water and wastewater pretreatment.
Camera Direction: Southwest
Date/Time: April 15 2021 10:46 AM EST

36: RIMG0036
Description: Wastewater pretreatment chemicals.
Location: Chemical and control room for wash water and wastewater pretreatment.
Camera Direction: Northwest
Date/Time: April 15 2021 10:49 AM EST



37: RIMG0037
Description: Wastewater pretreatment chemicals.
Location: Chemical and control room for wash water and wastewater pretreatment.
Camera Direction:
Date/Time: April 15 2021 10:49 AM EST


38: RIMG0038
Description: Wasterwater pretreatment chemical feed pumps and controlers.
Location: West wall of chemical and control room for wash water and wastewater pretreatment.
Camera Direction: West
Date/Time: April 15 2021 10:50 AM EST



39: RIMG0039
Description: pH log.
Location: Chemical and control room for wash water and wastewater pretreatment.
Camera Direction: West
Date/Time: April 15 2021 10:51 AM EST

40: RIMG0040
Description: pH meter calibration kit. Note only one buffer, pH 7, was used for calibration.
Location: Chemical and control room for wash water and wastewater pretreatment.
Camera Direction: North.
Date/Time: April 15 2021 10:52 AM EST

41: RIMG0041
Description: Bottle of expired pH probe calibration buffer solution.
Location: Chemical and control room for wash water and wastewater pretreatment.
Camera Direction: NA
Date/Time: April 15 2021 10:54 AM

42: RIMG0042
Description: First and second stage pretreatment tanks (left to right).
Location: Outdoor pretreatment shed west of chemical and control room for wash water and wastewater pretreatment.
Camera Direction: Down
Date/Time: April 15 2021 11:05 AM EST

43: RIMG0043
Description: Final stage pretreatment take with pump to discharge pipe.
Location: South of outdoor pretreatment shed.
Camera Direction: Down
Date/Time: April 15 2021 11:06 AM EST

44: RIMG0044
Description: Washing area.
Location: Wash area.
Camera Direction: Northeast
Date/Time: April 15 2021 11:15 AM EST

45: RIMG0045
Description: Flow meter on discharge pipe.
Location: Chemical and control room for wash water and wastewater pretreatment.
Camera Direction: South
Date/Time: April 15 2021 11:17 AM

46: RIMG0046
Description: Discharge sampling location above discharge flow meter.
Location: Chemical and control room for wash water and wastewater pretreatment.
Camera Direction: Southwest
Date/Time: April 15 2021 11:18 AM EST

47: RIMG0047
Description: Discharge pipe with flow meter and sampling spigot.
Location: West wall of chemical and control room for wash water and wastewater pretreatment.
Camera Direction: West
Date/Time: April 15 2021 11:18 AM EST

48: RIMG0048
Description: Discharge pipe routing.
Location: South of wash area
Camera Direction: Up
Date/Time: April 15 2021 11:18 AM EST

49: RIMG0049
Description: Discharge pipe routing.
Location: South of wash area
Camera Direction: Up
Date/Time: April 15 2021 11:19 AM EST

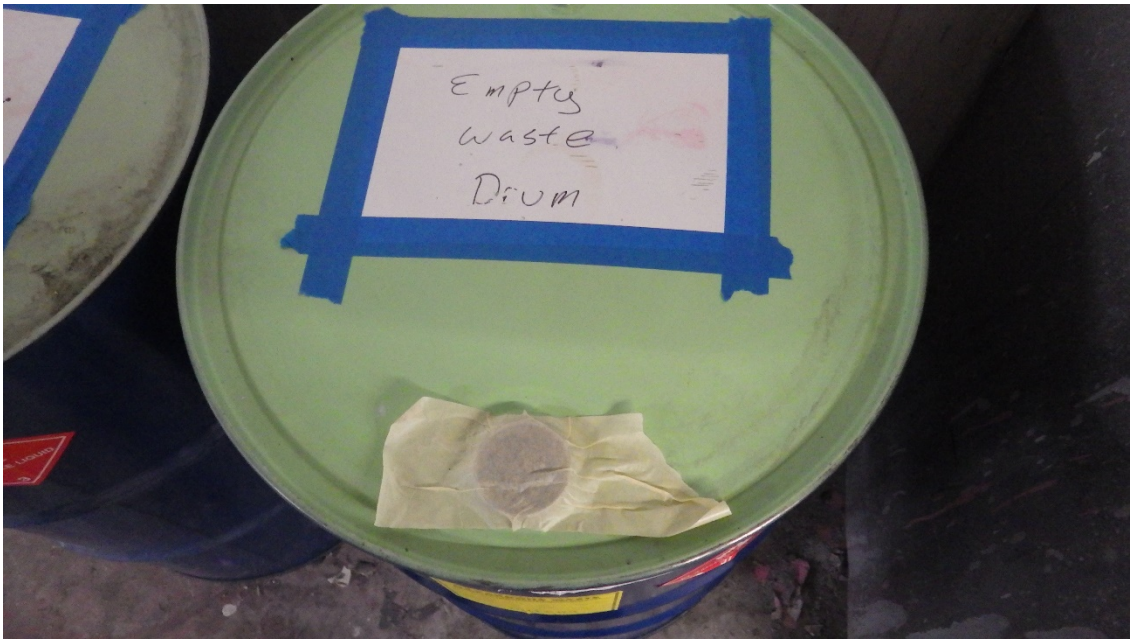
50: RIMG0050
Description: Wet paint equipment and cleaner.
Location: South of wash area.
Camera Direction: South.
Date/Time: April 15 2021 11:24 AM EST

51: RIMG0051
Description: Close up of label on blue drum seen in photo 50.
Location: South of wash area.
Camera Direction: South
Date/Time: April 15 2021 11:24 AM EST

52: RIMG0052
Description: Close up of lid of blue drum seen in photo 50 and 51.
Location: South of wash area.
Camera Direction: Down
Date/Time: April 15 2021 11:11:24 AM

53: RIMG0053
Description: Paint equipment cleaning chemical drum.
Location: North wall of central area west of wash area.
Camera Direction: North.
Date/Time: April 15 2021 11:25 AM EST

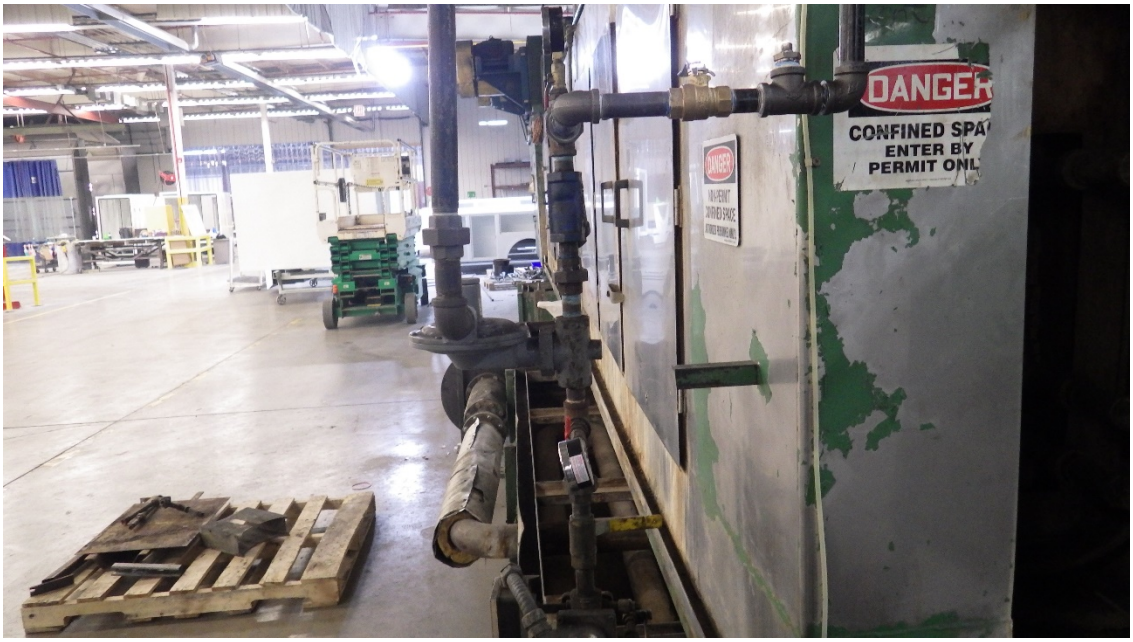
54: RIMG0054
Description: Spent cleaning liquid and empty waste drums.
Location: North wall of central area west of wash area.
Camera Direction: Northwest.
Date/Time: April 15 2021 11:25 AM EST



55: RIMG0055
Description: Close up of waste drum lid.
Location: North wall of central area west of wash area.
Camera Direction: Down.
Date/Time: April 15 2021 11:26 AM EST

56: RIMG0056
Description: Chemical storage located in northwest corner of western portion of the facility.
Location: Northwest corner of western portion of the facility.
Camera Direction: Northwest
Date/Time: April 15 2021 11:26 AM EST

57: RIMG0057
Description: Finished product assembly.
Location: West side of facility.
Camera Direction: Southwest.
Date/Time: April 15 2021 11:27 AM EST



58: RIMG0058
Description: Newly purcharsed parts washer (not yet installed).
Location: Centrally located in the western portion of the facilty.
Camera Direction: West
Date/Time: April 15 2021 11:33 AM EST

59: RIMG0059
Description: Newly purcharsed parts washer (not yet installed).
Location: Centrally located in the western portion of the facilty.
Camera Direction: East.
Date/Time: April 15 2021 11:33 AM EST

60: RIMG0060
Description: Newly purcharsed parts washer (not yet installed).
Location: Centrally located in the western portion of the facilty.
Camera Direction: North.
Date/Time: April 15 2021 11:35 AM EST


61: RIMG0061
Description: Shipping area.
Location: South side of western portion of the facility.
Camera Direction: Southwest.
Date/Time: April 15 2021 11:41 AM EST

62: RIMG0062
Description: Small sub operation producing large food processors.
Location: Southwest corner of facility.
Camera Direction: Southeast.
Date/Time: April 15 2021 11:43 AM

63: RIMG0063
Description: Fire truck bodies being produced.
Location: South side of western side of facility.
Camera Direction: East
Date/Time: April 15 2021 11:47 AM EST

64: RIMG0064
Description: Nonfunction flood drain south of powder coat area.
Location: South of powder coat area.
Camera Direction: Down
Date/Time: April 15 2021 11:54 AM EST

65: RIMG0065
Description: Bedliner area.
Location: West of powder coating area.
Camera Direction: Down.
Date/Time: April 15 2021 11:56 AM EST

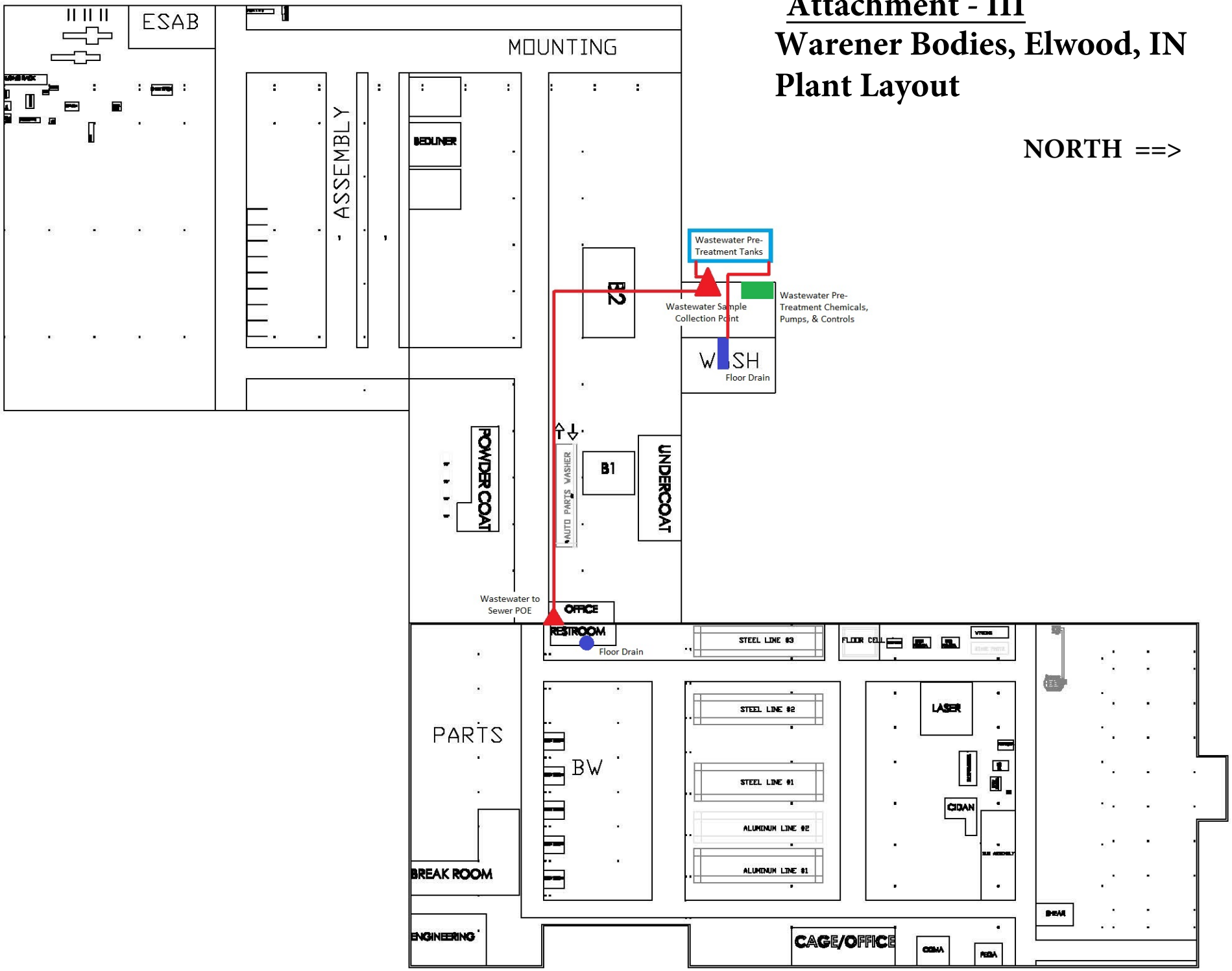
Attachment II (Figure 1) - Aerial View of the Facility

NORTH

NORTH

Attachment - III
Warener Bodies, Elwood, IN
Plant Layout

NORTH ==>



Attachement - IV

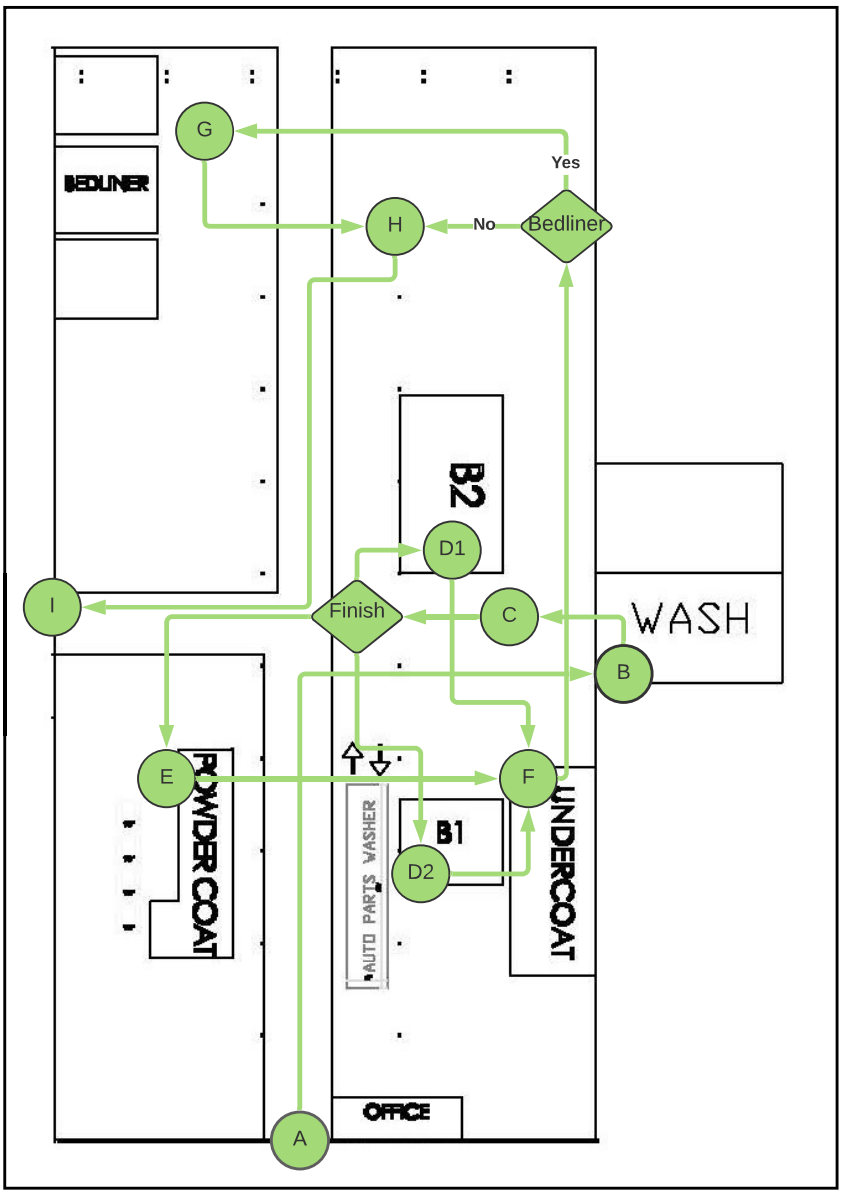
Paint Process Flow

A. Entry to Paint
B. Prep/Wash
C. Drying
D1/D2. Primer/Paint
- Multiple SDS (See Physical Binders)

E. Powdercoat
F. Undercoat
- SWT SBA-31 (Superior Checmical)

G - Bedliner
- SMT2930-2931_Truck_Bed_Liner (Smart)
- SMT2930-2931_Hardener (Smart)

H - QC
I - Exit to Final Assembly



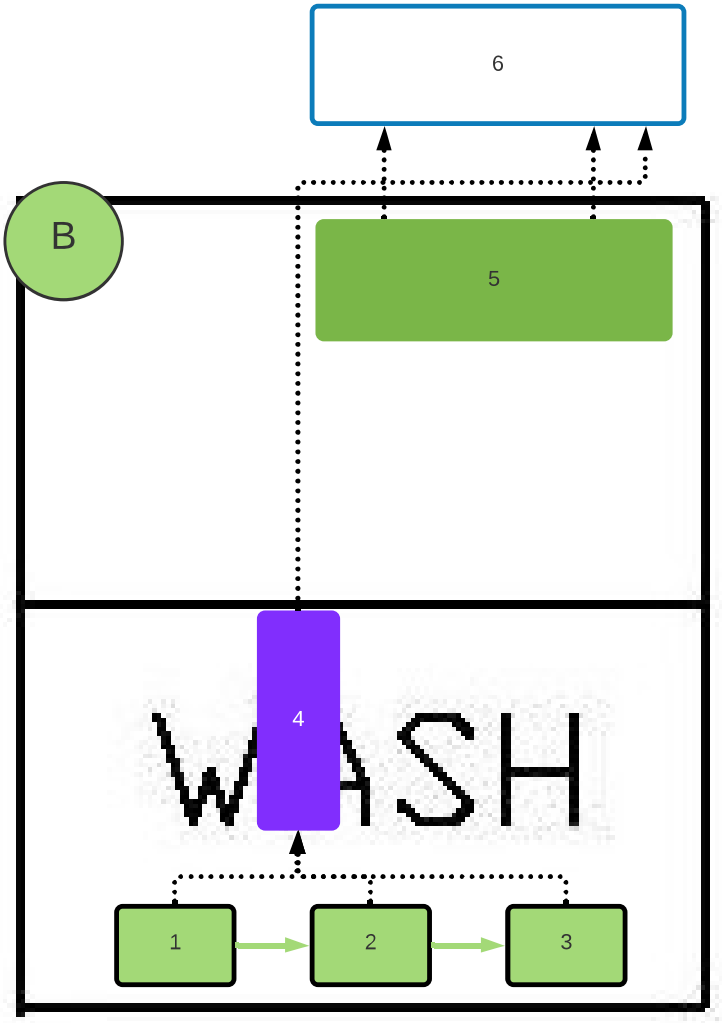
Attachment - IV

Warner

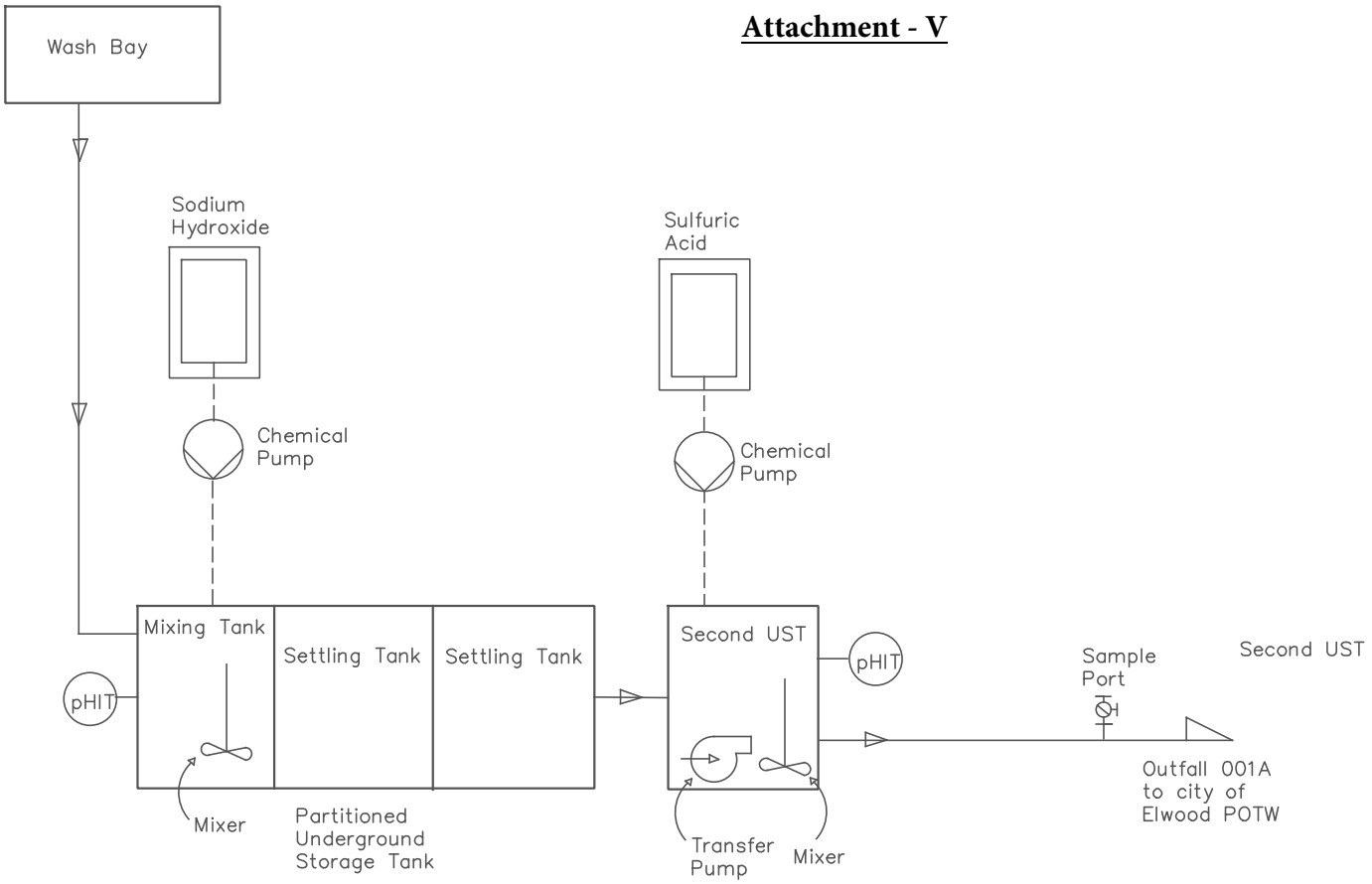
Paint Process Flow

B - Prep/Wash Process

1. Apply Degreaser
   - ~~CFX436 (PPG)~~
   - SZ500
2. Etch/Wash Conditioner
   - LClean 2705 (Lincoln Chemical)
3. Rinse & Coat
   - LKote 3388NP (Lincoln Chemical)
4. Floor Drain
5. Wastewater Pre-Treatment
   - LAdjust 2375 (Lincoln Chemical)
   - LAdjust 2380 (Lincoln Chemical)



Attachment - V

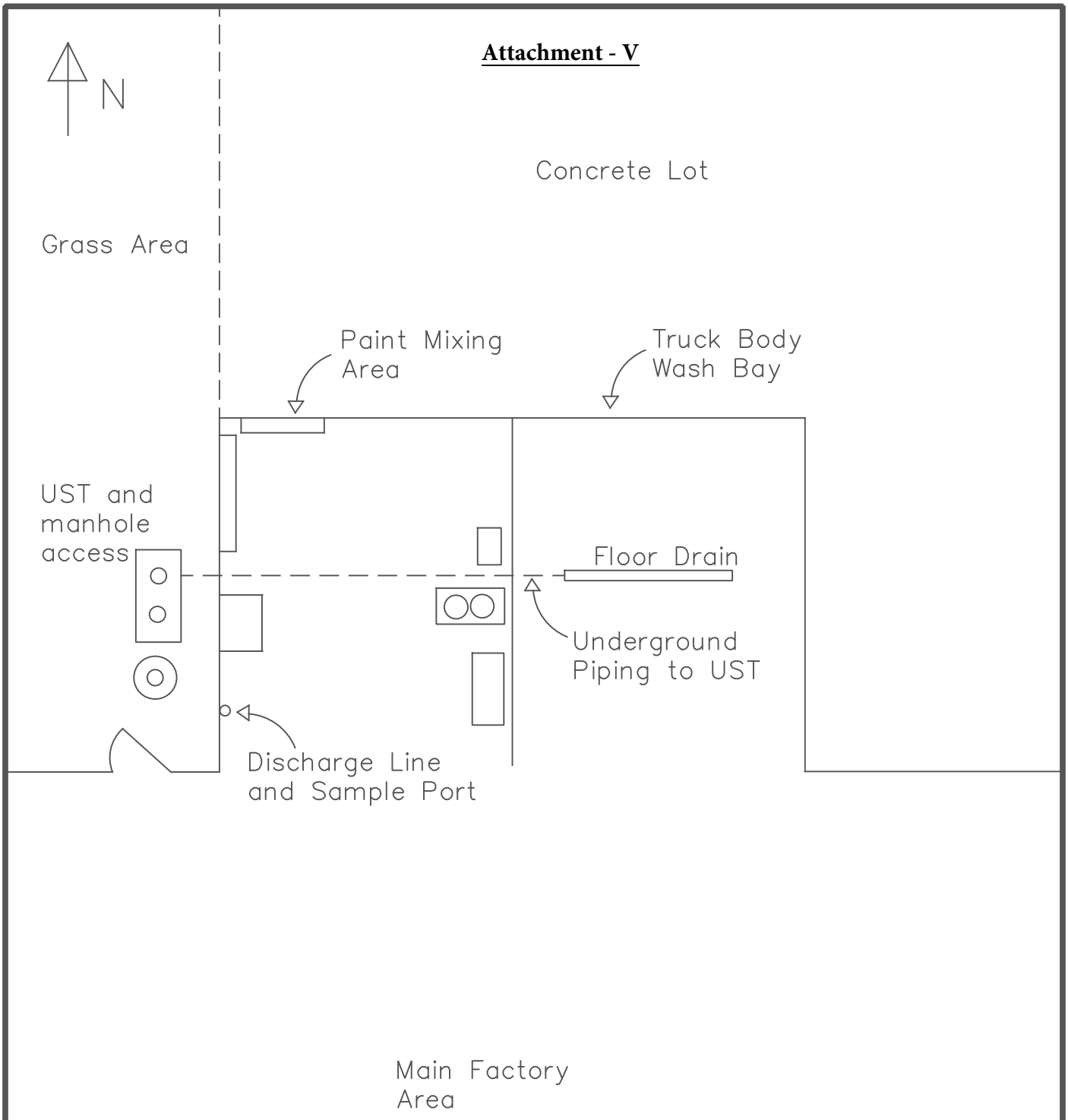


Process and Instrument Diagram For Zinc Removal From Wastewater

Warner Bodies
11700 North State Road 37
Elwood, IN 46036

Project Number	Date:	Figure
001.02.001	July 2018	3
Cimbrean Environmental Engineering LLC		Drawn By B.T.J.

Attachment - V



Wash and Paint Area Warner Bodies 11700 North State Road 37 Elwood, Indiana 46036	Project Number 001.02.001	Date: July 2018	Figure **2**
	Cimbrean Environmental Engineering LLC		Drawn By B.T.J.

Attachment VI – 40 CFR 433.17 Effluent Exceedances History

Truck Body Wash Water Discharges from External Outfall 001 – To Elwood POTW

Categorial Pretreatment Standard 40 CFR 433.17 Listed Pollutant Description	40 CFR 433.17 Permitted Limit Type	40 CFR 433.17 Permitted Value Unit	40 CFR 433.17 Permitted Limit Value	DMR Value	Monitoring Period Date	Percent Exceedance
Zinc, Total Recoverable	DAILY MX	mg/l	2.61	44.1	11/30/2016	1,590%
Zinc, total recoverable	MO AVG	mg/l	1.48	44.1	11/30/2016	2,880%
Zinc, total recoverable	DAILY MX	mg/l	2.61	18	12/31/2016	590%
Zinc, total recoverable	MO AVG	mg/l	1.48	18	12/31/2016	1,116%
Zinc, total recoverable	DAILY MX	mg/l	2.61	19.5	02/28/2017	647%
Zinc, total recoverable	MO AVG	mg/l	1.48	19.5	02/28/2017	1,218%
Zinc, total recoverable	DAILY MX	mg/l	2.61	10.2	03/31/2017	291%
Zinc, total recoverable	MO AVG	mg/l	1.48	10.2	03/31/2017	589%
Zinc, total recoverable	DAILY MX	mg/l	2.61	10.2	04/30/2017	291%
Zinc, total recoverable	MO AVG	mg/l	1.48	10.2	04/30/2017	589%
Zinc, total recoverable	DAILY MX	mg/l	2.61	14.1	05/31/2017	440%
Zinc, total recoverable	MO AVG	mg/l	1.48	14.1	05/31/2017	853%
Zinc, total recoverable	DAILY MX	mg/l	2.61	18.6	06/30/2017	613%
Zinc, total recoverable	MO AVG	mg/l	1.48	18.6	06/30/2017	1,157%
Zinc, total recoverable	DAILY MX	mg/l	2.61	22.6	07/31/2017	766%
Zinc, total recoverable	MO AVG	mg/l	1.48	22.6	07/31/2017	1,427%
Zinc, total recoverable	DAILY MX	mg/l	2.61	24.6	08/31/2017	843%
Zinc, total recoverable	MO AVG	mg/l	1.48	24.6	08/31/2017	1,562%
Zinc, total recoverable	DAILY MX	mg/l	2.61	4.78	09/30/2017	83%
Zinc, total recoverable	MO AVG	mg/l	1.48	4.78	09/30/2017	223%
Zinc, total recoverable	DAILY MX	mg/l	2.61	8.26	10/31/2017	216%
Zinc, total recoverable	MO AVG	mg/l	1.48	8.26	10/31/2017	458%
Zinc, total recoverable	DAILY MX	mg/l	2.61	27.3	11/30/2017	946%
Zinc, total recoverable	MO AVG	mg/l	1.48	27.3	11/30/2017	1,745%

Attachment VI – 40 CFR 433.17 Effluent Exceedances History

Truck Body Wash Water Discharges from External Outfall 001 – To Elwood POTW

Zinc, total recoverable	DAILY MX	mg/l	2.61	15.4	12/31/2017	490%
Zinc, total recoverable	MO AVG	mg/l	1.48	15.4	12/31/2017	941%
Zinc, total recoverable	MO AVG	mg/l	1.48	2.55	01/31/2018	72%
Zinc, total recoverable	DAILY MX	mg/l	2.61	33.6	02/28/2018	1,187%
Zinc, total recoverable	MO AVG	mg/l	1.48	33.6	02/28/2018	2,170%
Zinc, total recoverable	DAILY MX	mg/l	2.61	17.4	03/31/2018	567%
Zinc, total recoverable	MO AVG	mg/l	1.48	17.4	03/31/2018	1,076%
Zinc, total recoverable	DAILY MX	mg/l	2.61	16.8	04/30/2018	544%
Zinc, total recoverable	MO AVG	mg/l	1.48	16.8	04/30/2018	1,035%
Zinc, total recoverable	DAILY MX	mg/l	2.61	12.3	05/31/2018	371%
Zinc, total recoverable	MO AVG	mg/l	1.48	12.3	05/31/2018	731%
Zinc, total recoverable	DAILY MX	mg/l	2.61	8.81	06/30/2018	238%
Zinc, total recoverable	MO AVG	mg/l	1.48	8.81	06/30/2018	495%
Zinc, total recoverable	DAILY MX	mg/l	2.61	14.4	07/31/2018	452%
Zinc, total recoverable	MO AVG	mg/l	1.48	14.4	07/31/2018	873%
Zinc, total recoverable	DAILY MX	mg/l	2.61	14.6	08/31/2018	459%
Zinc, total recoverable	MO AVG	mg/l	1.48	14.6	08/31/2018	886%
Zinc, total recoverable	DAILY MX	mg/l	2.61	16.7	09/30/2018	540%
Zinc, total recoverable	MO AVG	mg/l	1.48	16.7	09/30/2018	1,028%
Zinc, total recoverable	DAILY MX	mg/l	2.61	30.1	10/31/2018	1,053%
Zinc, total recoverable	MO AVG	mg/l	1.48	30.1	10/31/2018	1,934%
Zinc, total recoverable	DAILY MX	mg/l	2.61	18.5	11/30/2018	609%
Zinc, total recoverable	MO AVG	mg/l	1.48	18.5	11/30/2018	1,150%
Zinc, total recoverable	DAILY MX	mg/l	2.61	9.14	12/31/2018	250%
Zinc, total recoverable	MO AVG	mg/l	1.48	9.14	12/31/2018	518%
Zinc, total recoverable	DAILY MX	mg/l	2.61	14.5	01/31/2019	456%
Zinc, total recoverable	MO AVG	mg/l	1.48	14.5	01/31/2019	880%
Zinc, total recoverable	DAILY MX	mg/l	2.61	21	02/28/2019	705%

Attachment VI – 40 CFR 433.17 Effluent Exceedances History

Truck Body Wash Water Discharges from External Outfall 001 – To Elwood POTW

Zinc, total recoverable	MO AVG	mg/l	1.48	21	02/28/2019	1,319%
Zinc, total recoverable	DAILY MX	mg/l	2.61	4.61	03/31/2019	77%
Zinc, total recoverable	MO AVG	mg/l	1.48	4.61	03/31/2019	211%
Zinc, total recoverable	DAILY MX	mg/l	2.61	13.2	04/30/2019	406%
Zinc, total recoverable	MO AVG	mg/l	1.48	13.2	04/30/2019	792%
Zinc, total recoverable	DAILY MX	mg/l	2.61	7.2	05/31/2019	176%
Zinc, total recoverable	MO AVG	mg/l	1.48	7.2	05/31/2019	386%
Zinc, total recoverable	DAILY MX	mg/l	2.61	21.8	06/30/2019	735%
Zinc, total recoverable	MO AVG	mg/l	1.48	21.8	06/30/2019	1,373%
Zinc, total recoverable	DAILY MX	mg/l	2.61	24.2	07/31/2019	827%
Zinc, total recoverable	MO AVG	mg/l	1.48	24.2	07/31/2019	1,535%
Zinc, total recoverable	DAILY MX	mg/l	2.61	16	08/31/2019	513%
Zinc, total recoverable	MO AVG	mg/l	1.48	16	08/31/2019	981%
Zinc, total recoverable	DAILY MX	mg/l	2.61	37	09/30/2019	1,318%
Zinc, total recoverable	MO AVG	mg/l	1.48	37	09/30/2019	2,400%
Zinc, total recoverable	DAILY MX	mg/l	2.61	17.3	10/31/2019	563%
Zinc, total recoverable	MO AVG	mg/l	1.48	17.3	10/31/2019	1,069%
Zinc, total recoverable	DAILY MX	mg/l	2.61	12.4	11/30/2019	375%
Zinc, total recoverable	MO AVG	mg/l	1.48	12.4	11/30/2019	738%
Zinc, total recoverable	DAILY MX	mg/l	2.61	8.36	12/31/2019	220%
Zinc, total recoverable	MO AVG	mg/l	1.48	8.36	12/31/2019	465%
Zinc, total recoverable	DAILY MX	mg/l	2.61	9.85	01/31/2020	277%
Zinc, total recoverable	MO AVG	mg/l	1.48	9.85	01/31/2020	566%
Zinc, total recoverable	DAILY MX	mg/l	2.61	10.5	02/29/2020	302%
Zinc, total recoverable	MO AVG	mg/l	1.48	10.5	02/29/2020	609%
Zinc, total recoverable	DAILY MX	mg/l	2.61	17.4	03/31/2020	567%
Zinc, total recoverable	MO AVG	mg/l	1.48	17.4	03/31/2020	1,076%
Zinc, total recoverable	DAILY MX	mg/l	2.61	16.9	04/30/2020	548%

Attachment VI – 40 CFR 433.17 Effluent Exceedances History

Truck Body Wash Water Discharges from External Outfall 001 – To Elwood POTW

Zinc, total recoverable	MO AVG	mg/l	1.48	16.9	04/30/2020	1,042%
Zinc, total recoverable	DAILY MX	mg/l	2.61	5.33	05/31/2020	104%
Zinc, total recoverable	MO AVG	mg/l	1.48	5.33	05/31/2020	260%
Zinc, total recoverable	DAILY MX	mg/l	2.61	8.33	06/30/2020	219%
Zinc, total recoverable	MO AVG	mg/l	1.48	8.33	06/30/2020	463%
Zinc, total recoverable	DAILY MX	mg/l	2.61	5.37	07/31/2020	106%
Zinc, total recoverable	MO AVG	mg/l	1.48	5.37	07/31/2020	263%
Zinc, total recoverable	DAILY MX	mg/l	2.61	7.3	08/31/2020	180%
Zinc, total recoverable	MO AVG	mg/l	1.48	7.3	08/31/2020	393%
Zinc, total recoverable	DAILY MX	mg/l	2.61	5.7	09/30/2020	118%
Zinc, total recoverable	MO AVG	mg/l	1.48	5.7	09/30/2020	285%
Zinc, total recoverable	DAILY MX	mg/l	2.61	16.3	10/31/2020	525%
Zinc, total recoverable	MO AVG	mg/l	1.48	16.3	10/31/2020	1,001%
Zinc, total recoverable	DAILY MX	mg/l	2.61	7.82	11/30/2020	200%
Zinc, total recoverable	MO AVG	mg/l	1.48	7.82	11/30/2020	428%
Zinc, total recoverable	DAILY MX	mg/l	2.61	20.2	12/31/2020	674%
Zinc, total recoverable	MO AVG	mg/l	1.48	20.2	12/31/2020	1,265%
Organics, total toxic [TTO]	DAILY MX	mg/l	2.13	17.40	12/31/2016	717%
Organics, total toxic [TTO]	DAILY MX	mg/l	2.13	4.3	12/31/2017	102%
Organics, total toxic [TTO]	DAILY MX	mg/l	2.13	8.38	06/30/2019	293%
Organics, total toxic [TTO]	DAILY MX	mg/l	2.13	88	12/31/2019	4031%
Organics, total toxic [TTO]	DAILY MX	mg/l	2.13	4.24	12/31/2020	99%

Attachment VII – TTO Reporting Discrepancies– DMR Vs. Lab Results

Truck Body Wash Water Discharges from External Outfall 001 – To Elwood POTW

Categorial Pretreatment Standard 40 CFR 433.17 Listed Pollutant Description	40 CFR 433.17 Limit Type	40 CFR 433.17 Value Unit	40 CFR 433.17 Permitted Limit Value	Monitoring Period Date	Total of all toxic organics over 0.01 mg/l	
					Facility Reported DMR Value	Lab Results
Organics, total toxic [TTO]	DAILY MX	mg/l	2.13	12/31/2016	17.40	57
Organics, total toxic [TTO]	DAILY MX	mg/l	2.13	12/31/2017	4.3	40.4
Organics, total toxic [TTO]	DAILY MX	mg/l	2.13	06/30/2019	8.38	41.6
Organics, total toxic [TTO]	DAILY MX	mg/l	2.13	12/31/2019	88	14.8
Organics, total toxic [TTO]	DAILY MX	mg/l	2.13	12/31/2020	4.24	6.74