

TOWN OF SPEEDWAY

INDUSTRIAL  
PRETREATMENT

ANNUAL REPORT

2015

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## Industrial User Survey

The Town of Speedway Industrial Pretreatment Program currently includes six permitted significant industrial users. They are: Allison Transmission, Inc. 4700 W. 10th St., which is also a categorical industry listed in the metal finishing category; Coca Cola Bottling Co., 5000 W. 25th St.; Praxair Surface Technologies, Inc., 1500 Polco St.; Praxair Surface Technologies, Inc. Main St., 1415 Main St., which is a categorical industry listed in the metal finishing category; General Motors, LLC, 4315 Cossell Road & 901 Grande Ave; and Merrell Bros., Inc., Indy Disposal Solutions, 4115 W. Vermont St.

Our original Allison Transmission Div., GMC was bought by a company that legally became named Allison Transmission, Inc. This company has kept all the processes formerly operated by Allison GMC except the remediation sites which are now permitted under a separate permit. Allison Transmission, Inc. applied for and was granted a new discharge permit effective October 1, 2007 and again renewed on October 1, 2012. Allison Transmission, Inc. has no affiliation with General Motors. The two remediation sites formerly operated by Allison GMC are now operated by General Motors, LLC and are still a part of GMC. They applied for and received a new permit effective October 1, 2009.

Merrell Bros., Inc. as Indy Disposal Solutions has applied for and been granted a permit effective November 1, 2007 and again renewed November 1, 2012. Merrell Bros. receives septage, grease and municipal / industrial bio solids. These flows are treated and solids disposed of off-site. This process was built in 2008 and is on the wastewater treatment plant premises. Operations began in May of 2009.

General Motors, LLC was previously Environmental Remediation Corp (ENCORE). The name was legally changed to General Motors, LLC and a new permit was applied for and issued October 1, 2009 and again renewed on October 1, 2014.

## Significant Industrial User (SIU) Permits

All of the significant industrial users in the Town of Speedway have five year discharge permits. The current Praxair Main St. permit became effective on 2-1-14 and will expire on 1-31-19. The current Praxair Polco St. permit became effective on 3-16-15 and will expire on 3-15-20. The Coca Cola permit has been reissued and was effective on 6-16-12 and will expire on 6-15-17. The Allison Transmission permit has been reissued and was effective on 10-1-12 and will expire on 9-30-17. The General Motors, LLC permit became effective on 10-1-14 and will expire on 9-30-19. The Merrell Bros. permit has been reissued and was effective on 11-1-12 and will expire on 10-31-17.

## Inspection and Monitoring

The Town of Speedway inspects and monitors all its significant industrial users on a regular basis. All significant industrial users are required to be inspected at least once annually; during 2015 all significant industrial users were inspected. Site visits are also accomplished on an as needed basis.

The Town of Speedway tries to monitor each significant industrial user more frequently than the required one-time per year. The Town samples for the parameters listed in the industrial users permit. Most monitoring was unannounced in 2015. In 2015, Coca Cola was sampled 3 times. Praxair Surface Technologies, Polco St. was sampled 3 times at each discharge point. Allison Transmission was sampled 3 times at each point of discharge. Praxair Main St. was sampled 3 times at their overall discharge point, 3 times at their effluent treatment plant, and 1 time at each of their metal finishing ancillary process discharges (003, 005, 008 and 009). General Motors, LLC was sampled 3 times at each discharge point. And finally, Merrell Bros. was sampled 3 times. The Town of Speedway will monitor any industry whenever it suspects permit violations.

All permitted industries are required to self-monitor at regular intervals. The frequency of this self-monitoring varies from industry to industry as each permit directs. In 2015, all permitted industries sampled as often as their permits direct.

During 2009, the WWTP did a special sampling which included daily 24 hr. composite monitoring at 4 different locations. These samples were taken at Coca Cola, Allison Transmission, and the effluent from the Indianapolis Motor Speedway and a section of Town which is densely populated. We had Commonwealth Bio monitoring check all these samples for nitrification inhibition. There were some samples that had some inhibition, but nothing that seemed severe enough to cause plant problems.

## Summary

During 2015, Coca Cola had 2 pH violations which required a written response. These violations were responded to in less than 24 hours of the incident. Subsequent testing indicated they were back within required limits. The first incident was due to process control adjustments that were needed with the new Reverse Osmosis water treatment system. The second was due to the discharge from an Ammonia Scrubber dispersion tank. This water is now hauled away for disposal and not discharged to the sewers. In addition to the violations, there were surcharges billed to the industry for excess BOD and TSS, these surcharges totaled \$65,139.95.

Allison Transmission had 1 violation, copper limit exceedance. A sewer cleaning project caused copper to exceed the set limits. Subsequent testing indicated they were back within required limits. Allison's was billed surcharges for excess BOD, Ammonia and Oil/Grease in the amount of \$2,595.70.

Praxair Polco St. had 1 violation, copper limit exceedance. It was determined that this was due to heavy sediment back up in a 30 inch sewer line allowing copper concentration to build and release into the main with higher flows. The line has been cleaned and subsequent testing indicated they were back within required limit. They were billed surcharges for excess BOD, TSS and Ammonia in the amount of \$1,446.98.

Praxair Main St. had 1 violation, nickel limit exceedance. Investigation was able to determine the cause to be contamination of a settling tank. Proper protective measures have been taken as well as additional employee training. Subsequent testing indicated they were back within required limits. They were surcharged \$2.34 for excess Ammonia.

General Motors, LLC had no violations and no surcharges.

Merrell Bros. had no violations and was surcharged \$51,051.52 for excess BOD, TSS and Ammonia.

In response to the 2012 Indiana Department of Environmental Management audit of our Industrial Pretreatment Program we have incorporated additional testing requirements for our Industrial Users. New testing requirements will be based on the parameters of all our local limits. All industries received permit modifications and will have these modifications incorporated into their permits as they cycle.

We had no Industries listed in significant noncompliance for 2015. One Industry, Coca Cola, entered into a 3 year Compliance Plan in 2012 due to continued issues concerning discharge violations. With the new Reverse Osmosis Water Treatment System now on-line and the subsequent removal of all the lime/ferric equipment and chemicals, it has been determined that they have met all the required actions within the Compliance Plan. As of April 1, 2015 the Compliance Plan was closed and Coca Cola is in full compliance with the Town of Speedway.

## Evaluation

The Town of Speedway is currently satisfied with its industrial pretreatment program. The significant industrial users are cooperative, very responsive and attempt to assist the wastewater plant in any way possible. Although we did have some of the Industries exceed their permit limits, their actions in response were quick and we saw no impact to our wastewater facility. The Speedway Pretreatment Program has shown to be effective in that there are very rarely excessive amounts of any of our permitted parameters in our influent. This allows the treatment plant to function properly and to meet its NPDES Permit limits.

The personnel at the Speedway Wastewater Treatment Plant involved in the operation of the pretreatment program are experienced and well qualified. Our laboratory runs BOD5, TSS, pH, e coli, D.O. and ammonia. Metals analyses, cyanide, phosphorus and organics are run by an outside lab.

During 2015, the industrial flow was 205.6 million gallons which was 11.1% of the total influent plant flow of 1.847 billion gallons.

## **Compliance with NPDES**

During 2015, the Speedway Wastewater Treatment Plant was in compliance with its NPDES Permit as it relates to the industrial pretreatment program as far as we know. We have complied with all reporting requirements as specified in our NPDES Permit. We have issued permits to all known significant industrial users and have kept them up to date.

We have implemented required streamlining requirements and rewritten our Sewer Use Ordinance and modified all industrial permits as necessary.

## ATTACHMENT ONE

### Significant Industrial Users on Current Survey

<u>Industry</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Modifications</u>	<u>Expiration Date</u>
Allison Transmission, Inc. 4700 W. 10 <sup>th</sup> Street	2012-2	10-01-12	0	09-30-17
Coca Cola Bottling Co. 5000 W. 25 <sup>th</sup> Street	2012-1	06-16-12	1	06-15-17
Praxair Surface Technologies, Polco St. 1500 Polco Street	2015-1	03-16-15	0	03-15-20
Praxair Surface Technologies Main St. 1415 Main Street	2014-1	02-01-14	1	01-31-19
General Motors, LLC 4315 Cossell Rd. 901 Grande Ave.	2014-2	10-01-14	0	09-30-19
Merrell Bros., Inc.	2012-4	11-01-12	0	10-31-17

## ATTACHMENT TWO

### Inspection and Monitoring Efforts

Industry	Inspections	Site Visits	Compliance Monitoring Events	Self Monitoring Events
Allison Transmission, Inc.	1	1	6	161
Coca Cola Bottling Co.	1	1	2	365
Praxair Polco St.	3	0	6	48
Praxair main St.	1	0	11	32
General Motors, LLC	1	0	6	34
Merrell Bros.	1	0	3	53

## ATTACHMENT THREE

### Industrial Compliance 2015

Industry	Always Compliant	Occasionally in MNC*	Often in MNC*	In SNC**	On CS***	Back in Compliance	Published for NC****
Allison Trans.		(X)					
Coca Cola		(X)					
Praxair Polco		(X)					
Praxair Main		(X)					
General Motors, LLC	(X)						
Merrell Bros.	(X)						
<hr/>							
TOTAL #	2	4	0	0	0	0	0

\*MNC = Minor Noncompliance

\*\*SNC = Significant Noncompliance

\*\*\*CS = Compliance Schedule

\*\*\*\*NC = Noncompliance

## Pretreatment Performance Summary

### I. General Information

Control Authority Name: Speedway Wastewater Treatment

Address: 4251 W. Vermont Street

City: Indianapolis State/Zip: IN. 46222

Contact Person: Michael Davis

Contact Telephone Number: 317-246-2854

NPDES No.: IN0032972

Reporting Period: 2015

Total Categorical IUs: 2

Total Significant Noncategorical IUs: 4

### II. Significant Industrial User Compliance

	Significant Industrial Users	
	Categorical	Noncategorical
1) No. of SIUs Submitting BMR / No. Required.....	0 / 0	NA
2) No. of SIUs Submitting 90-Day Compliance Report / No. Required	0 / 0	NA
3) No. of SIUs Submitting Semiannual Report / No. Required	2 / 2	4 / 4
4) No. of SIUs Meeting Compliance Schedule / No. Required to Meet Schedule	0 / 0	0 / 0
5) No. of SIUs in Significant Noncompliance / Total No. of SIUs	0 / 2	0 / 4
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical)	0 / 6	

### III. Compliance Monitoring Program

	Significant Industrial Users	
	Categorical	Noncategorical
1) No. of Control Documents Issued / No. Required	2 / 2	4 / 4
2) No. of Nonsampling Inspections Conducted	2	6
3) No. of Sampling Visits Conducted	11	24
4) No. of Facilities Inspected (nonsampling)	2	4
5) No. of Facilities sampled	2	4

### IV. Enforcement Actions

	Significant Industrial Users	
	Categorical	Noncategorical
1) Compliance Schedules Issued / Schedules Required	0	0
2) Notices of Violations Issued to SIUs	1	4
3) Administrative Orders Issued to SIUs	0	0
4) Civil Suits Filed	0	0
5) Criminal Suits Filed	0	0
6) Significant Violators (attach newspaper list)	0	0
7) Amount of Penalties Collected (total dollars/IUs assessed)	0	0
8) Other Actions (sewer bans, etc...)	0	0
Total Surcharge: Excess BOD, TSS, NH3, O & G	\$0.00	\$170,862.14

I certify that the information contained is complete and accurate to the best of my knowledge.



3-14-16

Authorized Representative

Date

## 2016 Pretreatment Program Work Plan

Industry	Permit Expiration Date	Compliance Monitoring Frequency	SIU Self-Monitoring Frequency	Inspection Frequency
Allison Transmission, Inc.	09-30-17	2X / Year	Quarterly, Weekly 2X / Week, 2X / Year	1X / Year
Coca Cola Bottling Co.	06-15-17	1X / Year	Daily, 2X / Week Monthly, 2X / Year	1X / Year
Praxair Polco St.	03-15-20	2X / Year	2X / Monthly, 2X / Year	1X / Year
Praxair Main St.	01-31-19	6X / Year	Monthly, 2X / Year	1X / Year
General Motors, LLC	09-30-19	2X / Year	Monthly, Quarterly 2X / Year	1X / Year
Merrell Bros.	10-31-17	1X / Year	Weekly, 2X / Year	1X / Year

Note: All inspections and compliance monitoring frequencies are minimums.  
Additional inspections and monitoring will be done as necessary.

## **Publications of Significant Noncompliance**

This page was left blank on purpose due to the fact that there were no Industries that were in Significant Noncompliance for 2015.