



INDUSTRIAL PRETREATMENT PROGRAM

FAX TRANSMITTAL

Office Telephone: 317.639.7049

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To : David McGay, representing Thomas Krusly

FAX Number: 303-850-9214

From: Mr. Kim W. Cussen, IPP Specialist

Re: Tank 51 stormwater discharge

Date: April 19, 2011

Total Number of Pages (including cover sheet): 4

Comments/Additional Information: _____

David, I'm setting the effective date for April 21
due to the extreme rainfall predicted over the next
36 hours.

Please let me know if you have any questions.

- Kim W. Cussen

If you do not receive the complete document or if it is not legible, please call 317.639.7050

Belmont AWT 2700 South Belmont Ave. Indianapolis, IN 46221



SPECIAL DISCHARGE APPLICATION

City of Indianapolis / United Water / Belmont AWT

A: Generator's Name and Address: Thomas J. Krudy, Chapter 7 Trustee for ESI Environmental, Inc., 236 E. 15th Street, Indianapolis, IN 46202Contact Person David S. McLay Phone 303-850-9200 Fax 303-850-9214B: Is the wastewater to be (check one): Hauled? _____ Discharged to the sewer? Yes

If hauled: Hauler Company Name _____

Hauler Contact _____ Phone _____ Fax _____

C: Describe business activity at wastewater source. Former Waste Oil Recycling Facility. Water for discharge will come from a concrete secondary containment for a 1,000,000 gallon steel tank (Tank 51)D: List all chemicals and hazardous materials at this location Waste Oil in the facility – there are no chemicals stored in the Tank 51 secondary containmentE: Describe the nature of the wastewater and any treatment it has received The wastewater consists of precipitation that has accumulated in the Tank 51 Secondary Containment. The water has received no treatment.F: Annual discharge gallonage (est) 400,000 Frequency of discharges one time discharge

G: Attach any analytical data pertaining to the waste; including sample collection details and chain of custody forms.

H: Attach a payment of \$150.00, payable solely to The City of Indianapolis, for review of this application and related materials. Send all payments and documentation to: Mr. Kim Cussen, United Water, 2700 South Belmont Avenue, Indianapolis, Indiana 46221

Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on inquiry of the person or persons who manage the systems, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. To the best of my knowledge and belief, the wastewater to be discharged does not include any hazardous waste as defined in the Resource Conservation and Recovery Act, 42 U.S.C., Section 6901 et. seq., as amended, and the regulations thereunder, or in the Indiana Environmental Management Act, I.C. 13-7-1-1 et. seq., as amended, and the regulation thereunder. I understand that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Generator's Authorized Representative David S. McLayTitle Technical Manager Signature David S. McLay Date April 13, 2011

If waste is to be hauled: Hauler's Authorized Representative _____

Title _____ Signature _____ Date _____

Once approved by authorized representatives of the City of Indianapolis and United Water, this Application, and all attachments hereto, will constitute a special agreement and arrangement within the meaning of Section 671-12 of the City of Indianapolis and Marion County Code is expressly incorporated herein.

-----Special Discharge Application Review – For Official Use Only-----

X Approved; Authorized from April 21, 2011 to May 21, 2011 at \$ SEE ATTACHMENT per 1000 gal.

____ Rejected; Reason(s) _____

X Analysis Required; sample for SEE ATTACHMENTUW Approval Kim W. Cussen Title IPP Specialist Results received ✓ Date 4/15/11City Approval Brian W. Win Title Assistant Administrator Date 4/18/11

SEE ATTACHMENT FOR ADDITIONAL REQUIREMENTS & CONDITIONS!
KWC

ATTACHMENT

Special Discharge Agreement: Thomas J. Krudy, Trustee Abandoned Ecological Systems Inc. Site at 4910 West 86th Street, Indianapolis, IN -Tank 51 Containment Stormwater Discharge -

This is a special agreement, Issued pursuant to Section 671-12 of the Revised Code of Indianapolis and Marion County, Indiana, due to unusual and extraordinary circumstances, allowing the *permittee* to temporarily discharge accumulated stormwater from the Tank 51 containment area (only) at the abandoned Ecological Systems Inc. site, located at 4910 West 86th Street, Indianapolis Indiana 46268 (ESI site) into the City of Indianapolis Sanitary Sewer System (Sanitary Sewer System). This accumulated stormwater will be referred to as "Wastewater" in this agreement.

The following requirements and conditions shall apply to this discharge:

1. **DISCHARGE FEE:** The total volume discharged shall be measured, reported and paid by the generator at the completion of this discharge. A discharge volume fee of \$3.3928/1000 gallons shall apply to this discharge.

The volume fee payment shall be made by check, payable to The City of Indianapolis. This payment shall be mailed to:

Mr. Kim Cussen
United Water IPP Section
2700 South Belmont Avenue
Indianapolis, IN 46221.

2. **COMPLIANCE LIMITS:** The Wastewater shall be compliant with the following limitations prior to discharge:

<u>Effluent Characteristic</u>	<u>Daily Maximum (mg/l)</u>
pH	5.0-12.0 S. U.
Cadmium	1.2
Chromium, Total	24.0
Copper	2.2
Lead	4.7
Nickel	7.3
Zinc	38.0
Cyanide, Amenable	0.4
Total Petroleum Hydrocarbons	200
Polychlorinated Biphenyls (PCBs)	See a., below
Volatile Organic Compounds (VOC)*	Monitor
Semi-Volatile Organic Compounds (SVOC)	Monitor

- a. The permittee shall monitor for all of the PCB compounds listed in, and using, 40 CFR Part 136, Appendix A, Method 608. The Wastewater will not be approved for discharge to the Sanitary Sewer System if any PCB compound is detected above method detection limits.

Discharge is prohibited until the Wastewater sampling results have been reviewed and approved by City of Indianapolis representatives.

Analytical reports shall either be sent as an e-mail attachment or by fax to Mr. Kim Cussen at:

Kim.Cussen@UnitedWater.com
Fax: 317-639-7602

3. **TEST METHODS:** Sample analysis shall be performed utilizing only EPA-approved methods listed in **40 CFR Part 136**. Test data from an unapproved method will not be accepted. Method detection limits shall be sufficiently low enough to demonstrate compliance with the limits, or, in the case of PCB, VOC and SVOC analyses, shall adhere to the detection limits listed in the EPA test methods.
4. **SAMPLING REQUIREMENTS:** Compliance samples shall be collected using EPA-approved sampling methods, appropriate for the regulated parameters.
5. **DISCHARGE POINT RESTRICTION:** The approved liquid waste shall be discharged through the existing facility discharge line, accessed through Manhole SS17, that subsequently flows into the Indianapolis Sanitary Sewer System.
6. **DISCHARGE RATE AND CONTROL:** **Wastewater discharge from the Tank 51 containment area is prohibited whenever there is another regulated discharge occurring from the abandoned ESI site.** The permittee shall coordinate their discharge with the US EPA, who is overseeing the other regulated discharge from the ESI site. The permitted Wastewater discharge flow rate shall never exceed a *peak* of **500** gallons per minute. The permittee shall install flow controls that restrict the discharge so this rate is never exceeded, even instantaneously. If the City determines that this discharge rate adversely affects the sanitary sewer system, at any location throughout the system, including the wastewater treatment plant, the city reserves the right to further revise this condition to adequately protect its system.
7. **WET WEATHER DISCHARGE PROHIBITION:** To avoid potential downstream sanitary sewer overflows, discharge of the Wastewater is prohibited 4 (four) hours before, during, and 24 (twenty-four) hours after a predicted or actual $\frac{3}{4}$ (three quarters) of an inch or more of rainfall. The permittee may seek guidance on this prohibition by contacting either of the City representatives listed in Paragraph 9, below.
8. **NON-TRANSFERRABLE:** This special discharge agreement applies only to the permittee and is not transferrable.
9. **DISCHARGE EVENT REPORTING:** After obtaining City approval of the sampling results, the permittee shall report to City representatives the dates and times (EST) when the Wastewater discharge will begin and is expected to end. The permittee shall submit this report to the City representatives by e-mail, Monday through Friday. On the weekends, the report shall be communicated by telephone to at least one of these representatives. When the discharge event is completed, the permittee shall send an e-mail to the City representatives detailing when the discharge ceased, the maximum discharge rate, and the total volume discharged.

City representatives to contact to satisfy this requirement:

Mr. Kim Cussen, 317-716-7777 (c), Kim.Cussen@UnitedWater.com.
Mr. Richard Wise, 317-223-1543 (c), Richard.Wise@indy.gov.