



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 21, 2024

VIA EMAIL

Mr. Anthony Cavicchioni
Ingram Micro Services
2675 Reeves Road #190
Plainfield, IN 46168

Re: Inspection Summary Letter
Ingram Micro Services
E-waste Registration #32-04 EW
Plainfield, Hendricks Co.

Dear Mr. Cavicchioni:

On 6/17/2024, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Ingram Micro Services, located at 2675 Reeves Road, Suite 190, Plainfield, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: Compliance Evaluation Inspection

Results of Inspection: Violation(s) were discovered and require a submittal

Within thirty (30) days of receipt of this letter, a written detailed explanation, documenting compliance with each of the requirements listed in the inspection report must be submitted to this office. Failure to respond adequately to this Violation Letter may result in a referral to the OLQ Enforcement Section. Please direct any response to this letter and any questions to Scott Draschil at (317) 418-9299 or sdraschi@idem.in.gov. Thank you for your attention to this matter.

Sincerely,

Susan Lowry
Section Chief
Hazardous Waste Compliance Section
Compliance Branch

Enclosure
cc: Hendricks County Health Department



**ELECTRONIC-WASTE INSPECTION REPORT
FOR REGISTERED PROCESSING / STORAGE**

As required by 329 IAC 16 (effective on 9-14-07)
State Form

**INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT**

Industrial Waste Compliance Section
Office of Land Quality
100 North Senate Avenue
MC-66-20-2 Shadeland Office
Indianapolis, Indiana 46204-2251

1	Facility Name: Ingram Micro Services		
E-waste Registration #: 32-04 EW		Registration Expiration Date: 10/16/2024	Database Tracking #: 32-04 EW
Location: 2675 Reeves Road Suit 190			Inspection Date: 6/17/2024
City: Plainfield		County: Hendricks	Zip Code: 46168
Inspector: Scott Draschil		Other IDEM Reps.: None	
Primary contact during inspection: Anthony Cavicchioni		E-mail: Anthony.cavicchioni@ingrammicro.com	
Type of Inspection: CEI <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> CAV <input type="checkbox"/> Limited <input type="checkbox"/> EFI <input type="checkbox"/> Other <input type="checkbox"/>			
Previous Inspections:			
Unresolved Past Violations (explain): None			
Max. Allowable E-waste Wt.: 600 tons		E-waste Wt. On-site: < 400 tons.	
Inspection Result: FOC – Facility out of Compliance – See Section 8			

2	Inspection Narrative – Include; general facility description, detailed description of e-waste and e-waste generating processes, inspection itinerary, relevant differences from previous inspections, description of contaminant releases, guidance documents provided, and other relevant comments.
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Upon arriving at the site I met with the facility's Senior Operations Manager, Mr. Tony Cavicchioni. At this location Ingram Micro Services mostly refurbishes and re-sells electronics. A small amount of e-waste is shredded in an on-site shredder for data destruction purposes. Ingram Micro-Services was storing e-waste consistent with their registration. The e-waste was well organized, containerized, properly labeled and tracked. The building was weather tight and had access controls and fire extinguishing equipment. Facility does not export CRTs, does not dismantle individual components and does not operate an e-waste drop off service. It was noted that e-waste signage will need to be placed by the front door in accordance with 329 IAC 16-7-1(a)(1).

Facility is an e-Steward certified electronics recycler and refurbisher and is ISO14001 certified.

3	Activities: Collecting <input checked="" type="checkbox"/> Brokering <input type="checkbox"/> Storing <input checked="" type="checkbox"/> Dismantling <input type="checkbox"/> Shredding <input checked="" type="checkbox"/>
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4	Documents Reviewed: Registration <input checked="" type="checkbox"/> Re-use/Recycle Plan <input type="checkbox"/> Weight Incoming/Outgoing <input type="checkbox"/> Shipping Papers <input type="checkbox"/> Training Log <input type="checkbox"/> Other (Describe) <input type="checkbox"/>
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5	E-waste Stream General Information (off-site shipment rate from processing and/or storing e-waste)		
	Description	Off-site Shipment Rate	Disposition
	E-waste – Various	Varies – Majority of electronics are refurbished for re-sale	Depends on scrap prices. No e-waste is being exported.

6	Pollution Prevention (P2)		
	The following P2 suggestions could possibly save money, reduce waste and/or minimize risk. You might consider having a P2 assessment, or a voluntary technical assistance consultation from IDEM staff or CMTI. Please visit the agency's P2 web site at www.in.gov/idem/oppta for additional information.		
None observed			
7	Violations: Any violations are indicated with a checkmark and are described in detail in Section 16 and include location information, corrective measures, and compliance dates if applicable.		
Acts Prohibited, Thermal or Chemical Treatment, & Registration		Regulatory Citation	Code
<input type="checkbox"/>	1 Acts Prohibited (threats to human health or the environment)	329 IAC 16-1-4	
<input type="checkbox"/>	2 Thermal or Chemical Treatment (obtain solid waste permit)	329 IAC 16-4-1(a)	
<input type="checkbox"/>	3 Thermal or Chemical Treatment (financial assurance under e-waste rule)	329 IAC 16-4-1(b)	
<input type="checkbox"/>	4 Registration Content Requirements & Expiration (5 years max.)	329 IAC 16-5-1	
<input type="checkbox"/>	5 Registration (operating without first submitting a registration)	329 IAC 16-5-2	
Storage Requirements			
<input type="checkbox"/>	6 Stored in weather tight building, closed container, or covered vehicle	329 IAC 16-6-1(a)	
<input type="checkbox"/>	7 Container label describing contents and date received (incoming containers)	329 IAC 16-6-1(b)	
<input type="checkbox"/>	8 Plan to reuse or recycle & if applicable, reason why storing over 1 year	329 IAC 16-6-1(c)(1)	
<input type="checkbox"/>	9 Records: amounts received, shipped for recycling, shipped for disposal	329 IAC 16-6-1(c)(2)	
<input type="checkbox"/>	10 Amounts must be recorded by weight only and by day, week, or month	329 IAC 16-6-1(c)(3)	
<input type="checkbox"/>	11 Shipping papers and manifests must be retained for 3 years	329 IAC 16-6-1(c)(4)	
<input type="checkbox"/>	12 Adequate fire-extinguishing equipment and submit contingency plan to fire dept.	329 IAC 16-6-1(d)	
<input type="checkbox"/>	13 Access controls in place and secure during non-business hours	329 IAC 16-6-1(e)	
<input type="checkbox"/>	14 Maintain land, building, vehicles, and containers free of other solid waste	329 IAC 16-6-1(f)	
<input type="checkbox"/>	15 Avoid threat to human health & the environment when storing solid waste (avoid storing electronic debris for more than 6 months)	329 IAC 16-6-1(g)	
Operational Requirements			
<input checked="" type="checkbox"/>	16 Sign for building (visible by door, at least 1' x 2', with at least 1" lettering)	329 IAC 16-7-1(a)(1)	
<input type="checkbox"/>	17 Building must have roof, impervious floor, and be completely enclosed	329 IAC 16-7-1(a)(2)	
<input type="checkbox"/>	18 Communication devices available when employees present and building in use	329 IAC 16-7-1(a)(4)	
<input type="checkbox"/>	19 Container & vehicle label describing contents and dated within 3 days after filled	329 IAC 16-7-1(b)	
<input type="checkbox"/>	20 Record Retention (registration, contingency plan, speculative accumulation, training log, & waste determination results)	329 IAC 16-7-1(c)	
<input type="checkbox"/>	21 Record Availability: required records and analytical must be available & furnished	329 IAC 16-7-1(d)	
<input type="checkbox"/>	22 No hazardous waste processing unless permitted for hazardous waste processing	329 IAC 16-7-1(e)	
Training Employees			
<input type="checkbox"/>	23 Training Annually (proper handling, safety, emergency procedures)	329 IAC 16-8-1(a)	
<input type="checkbox"/>	24 Training Log (copy of provided training, employee names & dates trained)	329 IAC 16-8-1(b)	
Miscellaneous			
<input type="checkbox"/>	25 E-waste & E-debris Determination (required for disposal in & out of state)	329 IAC 16-9-1	
<input type="checkbox"/>	26 Closure (notify prior to closure, dispose of waste properly, closure certification)	329 IAC 16-10-1	
<input type="checkbox"/>	27 Financial Assurance (surety bond, \$200 per ton, including electronic devices)	329 IAC 16-11-1	
<input type="checkbox"/>	28 Exporting broken CRTs for recycling requires approval from EPA & Country	40 CFR 261.39	
<input type="checkbox"/>	29 Exporting intact CRTs for recycling requires approval from EPA & Country	40 CFR 261.40	
<input type="checkbox"/>	30 Exporting intact CRTs for reuse requires a one time notification to EPA	40 CFR 261.41	
<input type="checkbox"/>	31 Hazardous Waste Determination (for waste not covered under 329 IAC 16-9-1)	40 CFR 262.11	
<input type="checkbox"/>	32 Other:		

Codes: A=refer to enforcement, B=needs follow-up evaluation or submittal, C= resolved on site, D=severity unknown

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Violation descriptions: Includes observed violations with corresponding regulatory citations, corrective measures, and compliance dates if applicable.

329 IAC 16-7-1 - Operational Requirements

Sec. 1. (a) A building used for processing or storage of e-waste must have the following:

(1) A sign that:

(A) is at least one (1) foot high by two (2) feet wide;

(B) is prominently displayed by the door; and

(C) legibly contains the following information in letters at least one (1) inch high:

(i) The name of the facility.

(ii) The hours the registered facility is open to accept e-waste from the public. If the facility does not accept e-waste from the public, this information can be omitted.

(iii) The registration number.

(iv) Clearly says the following, "Electronic waste is stored and/or processed inside."

(v) The name and telephone number of a designated emergency contact person.

Details: Facility did not have a sign displayed by the door with the above information.

Required Action: Post a sign by the front door that contains all the information required in 329 IAC 16-7-1. Provide documentation within 30 days of receipt of this inspection report that this violation has been corrected.

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Attachments: Map ☐ Manifest ☐ Notice of Inspection Form ☒ Pictures ☐
Photographer:
Other ☐:



INSPECTION
VERIFICATION/FINDINGS

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue
Indianapolis, Indiana 46204-2251
Telephone: (800) 451-6027 or (317) 232-8603
Web Page: <http://www.in.gov/idem/>

On 6/17/24 an inspection of INGRAM MICRO SERVICES was conducted by the undersigned representative of the Indiana Department of Environmental Management (IDEM), Office of Land Quality.

Type of Inspection (may include more than one):

- ☒ Routine Compliance Evaluation
☐ Follow Up Inspection
☐ Compliance Assistance Inspection

- ☐ Complaint
☐ Multi-Media Screening Evaluation
☒ Other: E-WASTE

Inspection Findings:

These findings are considered preliminary and identify specific compliance issues discovered during the above-noted inspection that the designated agent of IDEM believes may be a violation of a statute(s), rule(s) or permit(s) issued by IDEM.

- ☐ No violations were discovered with respect to the particular items observed during the inspection.
☐ Violations were discovered but corrected during the inspection.
☒ Violations were discovered and require a submittal from you and/or follow-up inspection by IDEM.
☐ Violations were discovered and may subject you to an appropriate enforcement response.
☐ Additional information/review is required to evaluate overall compliance.
☐ Other/Comments (attachment may be included): _____

Confidential Information

In accordance with 329 IAC 6.1 (<http://www.in.gov/legislative/jac/T03290/A00061.PDF>) a person submitting information to the department for which confidential treatment is requested shall make a written claim of confidentiality at the time of submittal of the information. A person may request confidential treatment of information at the time the information is acquired through the actions of the department, such as inspections. The written claim for confidential treatment may be broad, but must be sufficiently clear to allow for accurate identification of the information claimed to be confidential. In accordance with 329 IAC 6.1-4-1(d), supporting information must be submitted to the commissioner within five (5) working days from the time the information claimed as confidential is acquired by the department. A person submitting a claim of confidentiality shall designate and segregate the information and the supporting information to which the claim applies in a manner that is sufficiently clear to allow the department to identify all confidential claim materials. Confidential information may include (but is not limited to) written or printed material, maps, charts, photographs, or samples (see definition of information at 329 IAC 6.1-2-8). The undersigned Owner/Representative has alleged information acquired during this inspection ☐ does ☐ does not (check one) contain confidential information. A check in the "does" box is not a written claim for confidential treatment of information acquired during this inspection.

Notice of Oral Report

In accordance with IC 13-14-5 an oral report of the inspection was provided to the undersigned Owner/Agent at the conclusion of the inspection. The oral report includes any specific matters discovered during the inspection that the IDEM representative believes may be a violation of a law or of a permit issued by the department. The report does not include matters not evident to the IDEM representative or any fact that indicates an intentional, a knowing, or a reckless violation.

IDEM Representative:

Scott Draschil

Printed Name

317-418-9299

Phone Number

S. Draschil
Signature

sdraschi@idem.IN.gov

Email

6/17/24
Date

10:25 / 11:00
Time In/ Out

Owner/Representative:

ANTHONY CAVICCHIONI
Printed Name

(602) 460-4143
Phone Number

Anthony Cavicchioni
Signature

ANTHONY.CAVICCHIONI@INGRAMMICRO.COM
Email

SR. OPS MANAGER
Title

6/17/24
Date

IDEM prefers to email your report. Please check this box to indicate you prefer to receive a copy of the inspection report via U.S. mail: ☐