



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

November 15, 2024

VIA E-MAIL

Gary Huddleston, Environmental Manager
Real Alloy Specification, LLC
4525 West Old Highway 24
Wabash, Indiana 46992
Gary.huddleston@realalloy.com

Re: **Inspection Summary Letter**
Solid Waste Program ID 85-06

Dear Mr. Huddleston:

On November 13, 2024, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Real Alloy Non-Municipal Solid Waste Landfill, located at 4525 West Old Highway 24, Wabash, 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:	Routine
Results of Inspection:	No violations were observed (see attached inspection report).

Please direct any questions regarding this letter to me at 317-519-6896 or tsouth@idem.IN.gov.

Sincerely,

Troy South, Sr. Environmental Manager
Industrial Waste Section
Compliance Branch
Office of Land Quality

Enclosure
cc: Wabash County Health Department



Visit on.IN.gov/survey or scan the QR code to provide feedback.

We appreciate your input!





RESTRICTED WASTE SITE TYPE I OR II INSPECTION REPORT

State Form 53908 (1-09)
INDIANA STATE DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
Industrial Waste Compliance Section
Office of Land Quality
100 N. Senate Ave.
Mail Code 65-45
Indianapolis, IN 46204-2251

Facility Name Real Alloy Non-Municipal Solid Waste Landfill		
EPA Identification Number IND005243449		
Location 4525 West Old Highway 24		
City Wabash	County Wabash	ZIP Code 46992
Inspector Troy South		Inspection Date November 13, 2024
Other IDEM Representatives		
Primary contact during inspection Gary Huddleston, Brian Poitras		

A. Pre-Inspection File Review		
On-Site Disposal Notification Date N/I		
Restricted Waste Site Facility Type/Issuance Date Solid Waste Program ID 85-06 Non-Municipal Solid Waste Landfill /October 23, 2019 (Virtual File Cabinet [VFC] Document #82855558). This permit expires October 1, 2024. IDEM received the permit renewal application on April 17, 2024 and it is being reviewed.		
NMSWL Permit Reviewed by Inspector Date November 13, 2024		
Wastestream(s) permitted for disposal generated by facility		
<u>Wastestream(s) Classified</u>	<u>Classification Number</u>	<u>Expiration Date(s)</u>
Reverb Furnace Baghouse Dust	Waste Approval for On-site Generated Waste (no waste approval numbers created)	7/31/2025
Dryer Baghouse Dust		7/31/2025
Refractory		7/31/2025
Sedimentation Basin Cleanout		4/14/2025
Other wastestream(s) approved for disposal (such as those generated by other facilities): The facility may accept waste generated by other Real Alloy facilities provided that wastestream(s) have been approved by IDEM prior to disposal. The facility does not currently have waste approvals for other Real Alloy facilities.		
*The following materials cannot be disposed of until a waste approval update with a hazardous waste determination is submitted to IDEM as specified in your non-municipal solid waste landfill permit: *Dross Mill Silo Fines *Dross Mill Baghouse Dust *Rotary Salt Cake *Rotary Baghouse Dust *Assay Furnace Baghouse Dust		
Treated wastestream(s) {hazardous or non-hazardous}: None		
Previous Inspections: August 26, 2024		
Unresolved violations/comments: None		

B. Restricted Waste Site Inspection Comments

Process/Background Information

Real Alloy operates a secondary aluminum plant with five reverb furnaces located at Wabash, IN. The reverb furnaces can produce high quality metal in multiple forms which include molten, ingot, and two forms of sow. The Wabash facility produces recycled secondary specification aluminum alloys and specializes in processing drosses and salt cake. The site is also capable of shipping molten metal in 30,000-pound crucibles. The aluminum melting process includes a refractory and three baghouse dust collection units.

Real Alloy Specification operates a Non-Municipal Solid Waste Landfill (SW Program ID 85-06) with approximately 23.4 acres approved for disposal of aluminum smelting wastes generated on-site. The landfill can accept waste from other Real Alloy facilities if the waste streams have been pre-approved for disposal by IDEM. Dross generated at the Wabash plant is transported to the Real Alloy Recycling location in Wabash, IN for processing.

Inspection Findings

IDEM staff met Mr. Gary Huddleston at the the main office to review records. Facility landfill inspections, ground surface temperature readings, secondary chloride results, leachate levels, and the quarterly plot map were reviewed. The quarterly landfill report and the quarterly tonnage report were submitted to IDEM for the third quarter of 2024. Facility records were being kept as required. The facility is planning to conduct future pre-treatment of leachate prior to discharge at Wabash municipal treatment plant. Leachate Treatment System Design plans have been drafted by TRC Engineers.

IDEM staff and Mr. Brian Poitras proceeded on a landfill tour using an all terrain vehicle, driving over the top and around the landfill to observe the vegetation, boundary markers, and the groundwater monitoring wells. The vegetated cover was observed to be in good condition on the top and side slopes. The active fill area and working face are being graded regularly. Monitoring wells were capped/locked, labeled, and properly maintained. No operational/maintenance issues were seen.

Staff continued on the access road to look at the leachate storage tanks. Leachate is currently being hauled to Fort Wayne, IN wastewater treatment plant. No issues were observed with leachate collection at the time of inspection.

IDEM staff and facility staff drove over the top of the closed former land disposal area to view the active landfill (See Photo Log, Photo 1). No problems were seen.

The inspection continued to the Sedimentation Pond to observe conditions after cleanout was conducted during the previous quarter (See Photo 2). No issues were found with the pond. The inspection ended after driving back to the main office.

C. Restricted Waste Site Inspection Summary

C.1

Violations. The checklist below is not comprehensive but includes the most common violations. Checked violations and additional violations are described in detail in Section C.2 and include location information, corrective measures, and compliance dates. Appropriate documentation, photographs and maps may also be attached. When appropriate, a representative portion of a facility or documents may be inspected. A description of those portions inspected is provided in Section B, Restricted Waste Site Inspection Comments.

<input type="checkbox"/> 1) Permit Compliance 329 IAC 10-13-4(c)	<input type="checkbox"/> 17) First Aid Kit 329 IAC 10-28-7(b)	<input type="checkbox"/> 33) Establish & Maintain Vegetation 329 IAC 10-28-14(b)
<input type="checkbox"/> 2) Established Roadways 329 IAC 10-28-1(a)	<input type="checkbox"/> 18) Communications System 329 IAC 10-28-7(c)	<input type="checkbox"/> 34) Proper Grading 329 IAC 10-28-14(c)
<input type="checkbox"/> 3) Restricted Access 329 IAC 10-28-1(b)	<input type="checkbox"/> 19) On-Site/Up to Date Plans 329 IAC 10-28-8(a)	<input type="checkbox"/> 35) Vegetation Clearing 329 IAC 10-28-14(d)
<input type="checkbox"/> 4) Passable Roads 329 IAC 10-28-2(a)	<input type="checkbox"/> 20) Quarterly Plot Plans 329 IAC 10-28-8(b)	<input type="checkbox"/> 36) Surface Leachate Management 329 IAC 10-28-15(a)
<input type="checkbox"/> 5) Tracking Mud 329 IAC 10-28-2(b)	<input type="checkbox"/> 21) Furnishing Records to IDEM 329 IAC 10-28-8(c)	<input type="checkbox"/> 37) Leachate 50 ft Beyond SW Boundary 329 IAC 10-28-15(b)

<input type="checkbox"/> 6) Monitoring Well Access 329 IAC 10-28-2(c)	<input type="checkbox"/> 22) Open Burning 329 IAC 10-28-9	<input type="checkbox"/> 38) Leachate Disposal 329 IAC 10-28-16
<input type="checkbox"/> 7) Signs 329 IAC 10-28-3	<input type="checkbox"/> 23) Waste Deposited in Water 329 IAC 10-28-10(a)	<input type="checkbox"/> 39) Groundwater Monitoring Wells 329 IAC 10-28-17
<input type="checkbox"/> 8) Livestock Present 329 IAC 10-28-4(a)	<input type="checkbox"/> 24) Cover Soil Type 329 IAC 10-28-11(a)	<input type="checkbox"/> 40) Explosive Gases 329 IAC 10-28-19
<input type="checkbox"/> 9) Vector, Dust, Odor 329 IAC 10-28-4(b)	<input type="checkbox"/> 25) Cover Maintenance/ Alt. Cover Approval 329 IAC 10-28-11(b)	<input type="checkbox"/> 41) Leachate Collection 329 IAC 10-28-20
<input type="checkbox"/> 10) Litter 329 IAC 10-28-4(c)	<input type="checkbox"/> 26) Working Face Size (RWS I Only) 329 IAC 10-28-12(a)(1)	<input type="checkbox"/> 42) Closure Performance Standards 329 IAC 10-30-1
<input type="checkbox"/> 11) Dead Animal Disposal 329 IAC 10-28-4(d)	<input type="checkbox"/> 27) Cover Application & Compaction (RWS I Only) 329 IAC 10-28-12(a)(2)	<input type="checkbox"/> 43) Final Cover (RWS I Only) 329 IAC 10-30-2(a)
<input type="checkbox"/> 12) Outside Containers 329 IAC 10-28-4(e)	<input type="checkbox"/> 28) Intermediate Cover (RWS I Only) 329 IAC 10-28-12(a)(3)	<input type="checkbox"/> 44) Top Soil (RWS I Only) 329 IAC 10-30-2(b)
<input type="checkbox"/> 13) Scavenging 329 IAC 10-28-5	<input type="checkbox"/> 29) Cover Application & Compaction (RWS II Only) 329 IAC 10-28-12(b)	<input type="checkbox"/> 45) Final Cover (RWS II Only) 329 IAC 10-30-3(a)
<input type="checkbox"/> 14) Salvage Operations 329 IAC 10-28-6(a)	<input type="checkbox"/> 30) Fugitive Dust 329 IAC 10-28-13(a)	<input type="checkbox"/> 46) Top Soil (RWS II Only) 329 IAC 10-30-3(b)
<input type="checkbox"/> 15) Salvage Storage 329 IAC 10-28-6(b)	<input type="checkbox"/> 31) Daily Cover/Control Plan 329 IAC 10-28-13(b)	<input type="checkbox"/> 47) Other
<input type="checkbox"/> 16) Safety Devices 329 IAC 10-28-7(a)	<input type="checkbox"/> 32) Cover Continuous Maintenance 329 IAC 10-28-14(a)	

C.2	Violation descriptions: Includes observed violations with corresponding regulatory citations and permit conditions (when applicable), corrective measures and compliance dates.
No violations were observed during the November 13, 2024 IDEM inspection.	

ATTACHMENTS: <input type="checkbox"/> FACILITY MAP WITH LOCATION OF REGULATED WASTE ACTIVITY AND AREAS OF ENVIRONMENTAL CONCERN <input checked="" type="checkbox"/> PHOTO LOG <input type="checkbox"/> ADDITIONAL DOCUMENTATION:

Photo Log

Photo 1

Facility Name: Real Alloy NMSWL

Photographer: Troy South

Date: November 13, 2024

Others Present: Brian Poitras (Facility)

Location & Description: NMSWL view from former land disposal area.



Photo 2

Facility Name: Real Alloy NMSWL

Photographer: Troy South

Date: November 13, 2024

Others Present: Brian Poitras (Facility)

Location & Description: Sedimentation Pond cleanout completed.

