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June 25, 2024

Mr. Greg Glover  
Office of Water Quality  
Indiana Department of Environmental Management  
100 N. Senate Ave, IGCN 1255  
Indianapolis, IN 46204

RE: Inspection Summary/Noncompliance Letter (06/07/2024]  
Graber Post Buildings Inc.  
NPDES Permit No. IN0064386

Dear, Mr.Glover:

KERAMIDA, Inc. is submitting this letter on behalf of our client, Graber Post Buildings, Inc. (Graber), to formally acknowledge receipt of a noncompliance letter issued by the IDEM OWQ on June 7<sup>th</sup>, 2024, regarding a failure to sample and submit in NetDMR the analytical results and an annual DMR report per the conditions of their NPDES permit (Permit No. IN0064386) for Outfall 001SA. KERAMIDA is writing to acknowledge receipt of this noncompliance letter, offer an explanation as to the cause, articulate the corrective actions to be taken, and to ensure how future compliance will be assured to mitigate this deficiency in the future.

Graber failed to collect the required sample due to the following errors: miscommunication between staff and a generally flawed system of protocols and safeguards to support timely sampling and compliance within their permitting requirements.

The letter stated sampling was not conducted for Outfall 001 in 2023. A report was submitted but it did not contain the relevant and required sampling data. To avoid this violation, future sampling deficiencies and to improve the Self-Monitoring Program set forth in Part I. A. 1. of the NPDES permit, Graber Post Buildings Inc. will implement the following corrective actions and procedural improvements to assure future compliance:

- Create and implement an internal Corrective Action Plan, to identify the procedural flaws in sampling protocol to mitigate future occurrences of missed samples.
- Graber will plan to collect the annual sample for Outfall 001 and submit for analysis at least 30 days prior to the 4th quarter (October 1<sup>st</sup>) this year and in subsequent years, to leave sufficient time for completion and to allow for extenuating circumstances that might contribute to a late sample.
- Graber will delegate and train additional staff to conduct the testing and monitoring activities dictated by their NPDES permit as well as implement a more robust system for communicating regulatory due dates and deadlines to all staff involved.

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Graber expects to return to compliance within their permit limits by October 1st, 2024. Graber will continue to monitor the weather for future qualifying events and take the required sample during a qualifying rain event and submit it for laboratory analysis at least 30 days prior to the end of Quarter 3, 2024. A complete and compliant Annual DMR Report will be submitted in NetDMR by October 1<sup>st</sup>, 2024, to mitigate the missed sample in 2023. An additional sample will be taken and the associated 2024 Annual DMR Report will also be submitted before the end of the calendar year, December 31<sup>st</sup>, 2024. To ensure future compliance Graber is committed to taking future annual Stormwater Grab Samples before the 4<sup>th</sup> quarter of the following years to ensure enough time is left in the reporting window in the event any extenuating circumstances would cause a delay in sampling or reporting. Graber believes the above information provides the appropriate measures for our compliance plan moving forward. Please contact me if you would like to discuss the matter further or have additional questions at 317-685-6600.

Sincerely,  
KERAMIDA, INC.

*Dennert Ware*

Dennert O. Ware,  
Project Manager, EHS Compliance Services

Cc:  
Cody Greene, Graber Post Buildings, via email

Enclosures