



## Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

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(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
*Governor*

**Brian Rockensuess**  
*Commissioner*

June 28, 2024

Via Email to: [bdixon@premiermagnesia.com](mailto:bdixon@premiermagnesia.com)  
Mr. Bruce Dixon, Site Manager  
Giles Chemical, a division of Premier Magnesia, LLC  
200 Brown St  
Greendale, Indiana 47025

Dear Mr. Dixon:

Re: Inspection Summary Letter  
Giles Chemical  
NPDES Permit No. IN0064858  
Greendale, Dearborn County

An inspection of the above-referenced facility or location was conducted by a representative of the Indiana Department of Environmental Management, Office of Water Quality, pursuant to IC 13-18-3-9. A summary of the inspection is provided below:

Date(s) of Inspection: June 27, 2024  
Type of Inspection: Reconnaissance Inspection  
Inspection Results: Potential problems were discovered or observed.

This information is being forwarded to the OWQ Enforcement Section for consideration in conjunction with your Agreed Order, Case No. 2020-27528-W and 2019-25947-W. Please direct any response to this letter and any questions to Becky Ruark at 317-691-1909 or by email to [bruark@idem.IN.gov](mailto:bruark@idem.IN.gov). A copy of the NPDES Industrial Facility Inspection Report is enclosed for your records.

Sincerely,

Kim Rohr, Chief  
Wastewater Inspection Section  
Office of Water Quality

Enclosure

Cc: Jessica Irvine, Water Enforcement



# NPDES Industrial Facility Inspection Report

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NPDES Permit Number: <b>IN0064858</b>		Facility Type: Industrial		Facility Classification: Minor		TEMPO AI ID NA	
Date(s) of Inspection:		June 27, 2024					
Type of Inspection: Reconnaissance Inspection							
Name and Location of Facility Inspected: <b>Giles Chemical</b> 200 Brown St Greendale IN 47025				County: Dearborn		Receiving Waters/POTW: Tanners Creek	
						Permit Expiration Date: 5/31/2025	
						Design Flow: NA	
On Site Representative(s):							
First Name	Last Name	Title	Email	Phone			
Bruce	Dixon	Site Manager	bdixon@premiermagnesia.com				
Angi	Clark	EHS	aclark@premiermagnesia.com				
Lance	Dawson	VP, HR	ldawson@premiermagnesia.com				
Andy	Goolsby	Operations Manager	agoobsby@premiermagnesia.com				
David	Servies	Consultant	servies@patrioteng.com				
Was a verbal summary of the inspection given to the on-site rep? <b>Yes</b>							
Certified Operator:	Number:	Class:	Effective Date:	Expiration Date:	Email:		
NA							
Cyber Security Contact							
Name:		Email:					
Responsible Official: Mr. Bruce Dixon, Site Manager 200 Brown St Greendale, Indiana 47025				Permittee: Giles Chemical, a division of Premier Magnesia			
				Email: bdixon@premiermagnesia.com			
				Phone:		Contacted?	
						Yes	
				Fax:			
<b>INSPECTION FINDINGS</b>							
<input type="radio"/> Conditions evaluated were found to be satisfactory at the time of the inspection. (5) <input type="radio"/> Violations were discovered but corrected during the inspection. (4) <input checked="" type="radio"/> Potential problems were discovered or observed. (3) <input type="radio"/> Violations were discovered and require a submittal from you and/or a follow-up inspection by IDEM. (2) <input type="radio"/> Violations were discovered and may subject you to an appropriate enforcement response. (1)							
<b>AREAS EVALUATED DURING INSPECTION</b>							
<i>(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)</i>							
N	Receiving Waters	M	Facility/Site	N	Self-Monitoring	M	Enforcement
N	Effluent/Discharge	N	Operation	N	Flow Measurement		
N	Permit	N	Maintenance	N	Laboratory	N	Effluent Limits Compliance
		N	Sludge	S	Records/Reports	M	Other: SWPPP
<b>DETAILED AREA EVALUATIONS</b>							
This site visit was a scheduled visit to include discussion about the Agreed Orders and a walk through of the facility. IDEM Wastewater Inspection staff as well as IDEM Enforcement staff participated in the visit.							
<b>Effluent/Discharge:</b>							
Comments: There has been no discharge of non-contact cooling water covered by this permit since September 2022. There was no discharge observed during this inspection.							
<b>Facility/Site:</b>							
Comments: Facility/Site was evaluated as marginal. There is still a potential for an overflow of the temporary cooling tower. This could result in a spill. This spill							

would be reportable to IDEM. As the trial period with the current equipment concludes, a more permanent solution will be determined.

The containment area around the sulfuric acid storage tanks was not being used as designed. This containment area had a significant volume of "muddy" water present during this inspection. Water was being pumped back into the plant to be reused. The water from this containment area is not permitted to be discharged via any outfall. During the inspection, IDEM requested a complete flow diagram from the facility. This would include all water including process water, cooling water, recycled water, and storm water.

**Records/Reports:**

The following records/reports were reviewed:

DMRs for the period of January 2024 to May 2024 were reviewed as part of the inspection.

Comments:

The requested records were available and appear complete and accurate. All indicated no discharge.

**Enforcement:**

**2020-27528-W and 2019-25947-W**

**Aletha Lenahan**

Comments:

The Enforcement evaluation generated a marginal rating. Some quarterly reports have not been submitted. The 2nd quarter 2024 quarterly report for 2020-2758-W is due by July 10, 2024. Expectations for what should be included in the report were discussed during the meeting.

**Effluent Limits Compliance:**

Yes 1. Were DMRs reviewed as part of the inspection?

DMRs for the period of January 2024 to May 2024 were reviewed as part of the inspection.

No 2. Were violations noted during the review of DMRs?

Comments:

There was no discharge of non-contact cooling water reported during the period reviewed.

**Other:**

**SWPPP**

Comments:

The Other: SWPPP evaluation generated a marginal rating. During this inspection, IDEM requested a copy of the Storm Water Pollution Prevention Plan be submitted to inspection staff. This can be done after revisions are made to reflect staffing changes and new maps that were recently made available to facility staff.

**IDEM REPRESENTATIVE**

Inspector Name:	Email:	Phone Number:
Becky Ruark	bruark@idem.IN.gov	317-691-1909
Other staff participating in the inspection:		
Name(s)	Phone Number(s)	
Andrew Dryden	812-530-0429	
Aletha Lenahan	317-232-8407	

**IDEM MANAGER REVIEW**

IDEM Manager:	Date:
Kim Rohr	6/28/2024