

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

July 1, 2024

VIA EMAIL

Mr. Matthew Myers Siemens Water Technologies Corp 210 Sixth Avenue Suite 3300 Pittsburgh, PA 15222

> **Inspection Summary Letter** Re:

Siemens Water Technologies Corp

IND006374722

Madison, Jefferson County

Dear Mr. Myers:

On 6/26/2024, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Siemens Water Technologies Corp, located at 2753 Michigan Road, Madison, IN. 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: No Violation(s) Discovered

Please direct any response to this letter and any questions to me at (317) 503-1213 or kfrisbie@idem.in.gov.

Sincerely,

Katharine Frisbie

Hazardous Waste Compliance Section

Kato Int.

Compliance Branch

Enclosure

Jefferson County Health Department cc:







HAZARDOUS WASTE INSPECTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

| Inspector's Name: | Katharine Frisbie | | |
|-------------------|----------------------------------|----------------------------------|--|
| Others Present | John Naddy | Tech Environmental Specialist | |
| Date: | Wednesday, June 26, 2024 | | |
| Time In: | 9:50 PM | | |
| Time Out: | 10:50 PM | | |
| Inspection Type | Compliance Evaluation Inspection | | |

| | G | Seneral li | nformatio | n | | |
|---|---|---|--------------|--|-----------------------|-----------------------|
| Facility Information | | | | | | |
| Facility Name | Siemens Wat | ter Techn | ologies Co | orp | | |
| Facility Location | Madison, IN 4 | 2753 Michigan Road Madison, IN 47250 Jefferson County | | | | |
| Facility Mailing Information | 210 Sixth Avenue Suite 3300 Pittsburgh, PA 15222 | | | | | |
| Facility Contact | Same as Prin | nary Faci | lity Contac | t | | |
| Primary Facility Contact During Inspection | Matthew Myers (724) 772-6546 matthew.myers@evoqua.com | | | | | |
| | Salutation | First Name | Last Name | Title | Phone Number | Email |
| Other Facility Contact(s) During Inspection | Mr. | Chuck | Hensler | Director of U.S. Operations - SuperATV | (812) 801- 1740 | chensler@superatv.com |

| Facility ID | | | | |
|----------------------|--------------------------|------------------|--------|--|
| EPA ID Number | IND006374722 | NAICS Code | 332312 | |
| Facility Status | | | | |
| racility Status | | | | |
| File Status | Small Quantity Generator | Other Activities | | |
| | | • | · | |
| Outstanding Issues | | | | |
| Last Inspection Date | N/A | | | |
| Previous Violations | ☐ Yes 		 No | ☐ Yes 		 No | | |
| Details | | | | |

Inspection Narrative

A routine compliance evaluation of the former Siemens Water Technologies Corp (Siemens) site was conducted on June 26, 2024. Siemens used to operate at the facility, but they sold the building to SuperATV in 2016. SuperATV now operates at the site, but Siemens is responsible for continuing groundwater monitoring efforts and disposal of subsequent waste. IDEM staff spoke on the phone with Mr. Matthew Myers, Siemens Representative, regarding the nature of the inspection. Mr. Myers was not on site at the time of inspection, so Mr. Chuck Hensler, SuperATV Director of U.S. Operations, participated in an opening and closing conference and led IDEM staff on a tour of the facility.

The former Siemens site was two hundred thousand (200,000) square feet and SuperATV recently made a one hundred twenty-five thousand (125,000) square foot addition. SuperATV employs one hundred eighty (180) people and operates a

Katharine Frisbie

Page 1 of 6

Siemens Water Technologies Corp June 26, 2024

day shift from 6:00 AM to 4:00 PM as well as a skeleton night shift. Current operations on site include metal fabrication and finishing for after-market side by side parts. Mr. Hensler explained to IDEM staff that hazardous waste is not generated through these operations and a thorough facility tour confirmed that. Mr. Hensler and SuperATV have not taken on the responsibility of groundwater remediation, so Siemens continues to maintain their EPA ID Number and groundwater testing/disposal at this site. Mr. Hensler explained that once groundwater monitoring events cease at the site, he plans to close out all hazardous waste notifications associated with the site address and former operations.

Due to the lack of waste being generated on site and prior record review, this inspection was conducted pursuant to very small quantity generator (VSQG) standards. No violations were observed during the inspection. Please direct any responses to Katharine Frisbie at (317) 503-1213.

| Regulatory Status | | | | | |
|--------------------|--|------------------|--|--|--|
| Observed Activity | Very Small Quantity Generator | Other Activities | | | |
| Documents Reviewed | | | | | |
| Comments | Siemens no longer operates at this site. Hazardous waste is generated through groundwater sampling events and does not occur monthly. There was no waste being generated or stored on site at the time of inspection, and SuperATV does not generate any hazardous waste, so the facility was inspected as a VSQG. | | | | |

| | | | Was | te Management | | |
|---|--|-----------------------------|-----------|---|---|-------------------------------|
| Comments: | | | | | | |
| Waste Stream(s) I | nformation | | | | | |
| Waste Streams • Yes © No | ○ Not Inspected | ☐ Not Ap | pplicable | е | | |
| List waste stream(s) i longer generated, sig | | | | | : additional wa | ste streams, waste streams no |
| EPA Waste Codes | Description | Source | | Generation Rate | | Disposition |
| F002, D043 | D043 Hazardous waste, liquid, n.o.s. | | ater g | hundred-ten (1,710) po generated and shipped | Incidental - One thousand seven hundred-ten (1,710) pounds generated and shipped so far in 2024 and none was generated in 2023. | |
| No hazardous waste generated by SuperATV | Used Oil | sed Oil Machine maintenance | | Incidental | | Crystal Clean |
| Exempted/Exclude | ed C Yes @ | No 🖺 N | Not Insp | oected 🤼 Not Applicable | е | |
| Explanation | | | | | | |
| Waste Management Areas | | | | | | |
| Container Manage | ement Area(s) | Yes | No (| Not inspected Not | applicable | |
| EPA Waste Code | s Location | Number | Size | Type of Container | | |
| Used Oil | Used Oil Maintenance One (1) Tote F | | Plastic | | | |
| Satellite Area(s) C Yes No C Not inspected C Not applicable | | | | | | |
| | | | | | | |
| Tanks, Restricted Waste Sites, and Other Regulated Units Yes No Not inspected Not applicable | | | | | | |
| | | | | | | |

| Environmental Releases | | | | | |
|--|---|--|--|--|--|
| Visible Releases/Contamination/Discharges | | | | | |
| | | | | | |
| | | | | | |
| Complia | nce Assistance | | | | |
| P2 Information | | | | | |
| The following P2 suggestions could possibly save money, reduct assessment, or a voluntary technical assistance consultation fro | ce waste and/or minimize risk. You might consider having a P2 om IDEM staff. Please visit the agency's P2 web site at | | | | |
| ttp://www.in.gov/idem/5298.htm for additional information. | | | | | |
| Contact by IDEM OFF TA Requested | NO | | | | |
| P2 Suggestions | | | | | |
| | | | | | |
| Guidance Materials | | | | | |
| Guidance Materials Provided to Facility | | | | | |
| | | | | | |
| | Checklist cates a compliance concern) | | | | |
| Standards | TSDF Permit Requirements | | | | |
| ☐ Hazardous Waste Determination | ☐ TSDF Permit Requirements | | | | |
| Recordkeeping (SQG and LQG) | ☐ Other Violation | | | | |
| ☐ Identifying Hazardous Waste Numbers (SQG and LQG) | | | | | |
| ☐ Generator Category Determination | | | | | |
| ☐ Notification (SQG, LQG, Transporter, TSDF) | | | | | |
| Release to the Environment, Disposal of Solid Waste | | | | | |
| ☐ Illegal Dumping | | | | | |
| Other Violation | | | | | |
| | | | | | |
| LQG Hazardous Waste Standards Accumulate for 90 Days or Less | SQG Hazardous Waste Standards ☐ Accumulate for 180 Days or Less | | | | |
| ☐ Container Condition | ☐ Accumulation Limit | | | | |
| ☐ Compatibility of Waste with Container | ☐ Container Condition | | | | |
| ☐ Containers Closed | ☐ Compatibility of Waste with Container | | | | |
| ☐ Container Handling | ☐ Containers Closed | | | | |
| Central Accumulation Area Inspection | ☐ Container Handling | | | | |
| ☐ Ignitable or Reactive Wastes - Distance from | ☐ Central Accumulation Area Inspections | | | | |
| Property Line | ☐ Conditions for Accumulation of Incompatible Wastes | | | | |
| Ignitable or Reactive Wastes - Sources of Ignition/Reaction: "No Smoking" signs | Container Labeled "Hazardous Waste" | | | | |
| Conditions for Accumulation of Incompatible | Container Marked with Indication of Hazards | | | | |
| Wastes | Container Marked with Accumulation Start Date | | | | |

Katharine Frisbie

Page 3 of 6

Siemens Water Technologies Corp June 26, 2024

| Container Labeled "Hazardous Waste" | ☐ Tank Operating Conditions |
|--|--|
| Container Marked with Indication of Hazards | ☐ Tank Inspections |
| Containers Marked with Accumulation Start Date | ☐ Tank Labeled "Hazardous Waste" |
| ☐ Tank Integrity Assessment | ☐ Tank Marked with Indication of Hazardous |
| ☐ Tank Containment and Detection of Releases | ☐ Tank Documentation for 180-Day Accumulation |
| ☐ Tank General Operating Requirements | ☐ Land Disposal Restrictions |
| ☐ Tank Inspections | ☐ Maintenance and Operation of Facility |
| ☐ Tank Subpart BB - Monthly Pump and Valve Monitoring | ☐ Required Equipment ☐ Testing and Maintenance of Equipment |
| ☐ Tank Subpart CC - Annual Inspection/Monitoring | ☐ Access to Communications or Alarm System |
| ☐ Tank Labeled "Hazardous Waste" | ☐ Aisle Space |
| Tank Marked with Indication of Hazards | ☐ Arrangements with Local Authorities |
| ☐ Tank Documentation for 90-Day Accumulation | ☐ Arrangements with Local Authorities - Documentation |
| ☐ Maintenance and Operation of Facility | ☐ Emergency Coordinator |
| Required Equipment | ☐ Emergency Information Posted |
| Testing and Maintenance of Equipment | ☐ Employee Training |
| ☐ Aisle Space | ☐ Other Small Quantity Generator Standards |
| Arrangements with Local Authorities | VSQG Standards |
| Arrangements with Local Authorities - Documentation | Hazardous Waste Generation Limit |
| Contingency Plan Developed | Hazardous Waste Accumulation Limit |
| Content of Contingency Plan | Hazardous Waste Determination |
| Copies of Contingency Plan | Proper Disposal |
| Contingency Plan Quick Reference Guide | Prohibited Disposal of Liquids in Landfills |
| Emergency Coordinator | |
| Personnel Training Program | |
| Personnel Training - Complete Within Six Months | |
| Personnel Training Annual Review | |
| Personnel Training Documentation | |
| Personnel Training Record Retention | |
| ■ Notification for Closure | |
| ☐ Land Disposal Restrictions | |
| Large Quantity Generator - Other Violations | |
| | 1 |
| Satellite Accumulation – SQG and LQG Quantity Limits, Point of Generation, Under Control of Operator | Manifest and Recordkeeping - LQG and SQG ☐ Manifest General Requirements ☐ Use of the Manifest |
| Container Condition | Use of the Manifest |
| Compatibility with Container | |
| ☐ Incompatible Wastes | |

| Containers Closed | |
|---|---|
| Container Labeled "Hazardous Waste" | |
| Container Marked with Indication of Hazards | |
| ☐ Preparedness and Prevention | |
| ☐ Excess Generation | |
| | |
| Episodic Generation Notification | Hazardous Secondary Materials ☐ Reclaimed Under Control of the Generator |
| EPA ID Number | ☐ Contained |
| ☐ Accumulate for 60 Days or Less | ☐ Speculative Accumulation |
| ☐ Accumulation Prohibitions | □ Notice |
| Container Labeling | ☐ Documentation of Legitimacy Determination |
| ☐ Tank Labeling and Recordkeeping | ☐ Emergency Preparedness and Response |
| Recordkeeping | ☐ Emergency Procedures (Accumulates 6,000 kg or Less) |
| ☐ Preparedness and Prevention | Emergency Procedures (Accumulates Greater than 6,000 |
| ☐ Other Violation | kg) |
| | Cother Violation |
| | |
| Solvent-Contaminated Wipes – Disposal Container Management (Non-leaking containers) | Solvent-Contaminated Wipes - Laundered or Dry Cleaned Container Management (Non-leaking containers) |
| Closed Containers | Closed Containers |
| ☐ Labeling | ☐ Labeling |
| Accumulation Time | Accumulation Time |
| ☐ No Free Liquids | ☐ No Free Liquids |
| Free Liquids Management | ☐ Free Liquids Management |
| ☐ Documentation | □ Documentation |
| Final Disposition | ☐ Clean Water Act |
| <u> </u> | |
| Universal Waste – All Facilities | Used Oil – All Facilities |
| Universal Waste Labeling | Rebuttable Presumption Applies |
| Containers - Closed, Good Condition, No Evidence | Containers and Tanks in Good Condition |
| of Leaks | Containers/Tank Labeling |
| Universal Waste - Bulb Crushing Prohibition | Release Clean Up and Containment |
| | ☐ Burning Restrictions - Generated On-site or DIY, .5M BTU |
| | |
| Description | on of Violation(s) |
| | |
| | |

Inspection Documentation

| Photographs | C Yes C No |
|-----------------------------------|---|
| Мар | © Maps |
| GPS Location Collected | C Yes● No |
| Analytical Screening Conducted | C YesI No |
| Lab Sample | C YesNo |

| Inspection Results/Actions | | | | |
|----------------------------|-------------------|--|--|--|
| Comments: | | | | |
| Inspection Results | | | | |
| No Violation(s) Discovered | | | | |
| Multi-Media Concerns | | | | |
| No concerns | No concerns noted | | | |

| Finalize Inspection | | | | |
|-----------------------------------|--|---|--|--|
| Written Summary of Inspection | Notice of Inspection and Verbal Summary Provided | | | |
| | Printed/Typed Name | Katharine Frisbie | | |
| | Phone Number: | (317) 503-1213 | | |
| Inspector Information | Email Address: | kfrisbie@idem.in.gov | | |
| | Signature: | Obtained on the Inspection Verification/Findings Form | | |
| | Printed/Typed Name: | Matthew Myers | | |
| Facility Representative Signature | Signature: | Obtained on the Inspection Verification/Findings Form | | |



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/

26/2024 an inspection of Super ATV 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 Complaint Multi-Media Screening Evaluation Follow Up Inspection Compliance Assistance Inspection 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/iac/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:** Katie Frisbie Printed Name (317) 503-1213 kfrisbie@idem.in.gov Phone Number Owner/Representative:

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: