

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Northern Regional Office • 300 N. Dr. Martin Luther King Jr. Blvd, Suite 211 • South Bend, IN 46601-1295 (800) 753-5519 • (574) 245-4870 • Fax (574) 245-4877 • www.idem.IN.gov

Eric J. Holcomb

Governor

Commissioner

June 28, 2024

VIA EMAIL

Mr. Jack Shrader Maintenance Manager OTECH Corporation 4744 E. Oak Knoll Rd. Rolling Prairie, IN 46371

Re: Violation Letter

OTECH Corporation IND016604159

Rolling Prairie, La Porte County

Dear Mr. Shrader:

On 6/26/2024, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of OTECH Corporation, located at 4744 E. Oak Knoll Rd., Rolling Prairie, 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: Complaint

Results of Inspection: Violations 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 Office of Land Quality (OLQ) Enforcement Section. Please direct any response to this letter and any questions to Cathy Csatari at (574) 274-7130 or via e-mail at ccsatari@idem.IN.gov. Thank you for your attention to this matter.

Sincerely, James E. Wingart

James E. Weingart

Director

Northern Regional Office

Enclosure

cc: La Porte County Health Department



HAZARDOUS WASTE INSPECTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Inspector's Name:	Cathy Csatari
Others Present	
Date:	Wednesday, June 26, 2024
Time In:	8:49 AM
Time Out:	9:42 AM
Inspection Type	Complaint

	General Information
Facility Information	
Facility Name	OTECH Corporation
Facility Location	4744 E. Oak Knoll Rd. Rolling Prairie, IN 46371 La Porte County
Facility Mailing Information	Same Address as Facility
Facility Contact	Same as Primary Facility Contact
Primary Facility Contact During Inspection	Jack Shrader Maintenance Manager (219) 695-1298 jshrader@otechcompounds.com
Other Facility Contact(s) During Inspection	

		•		
Facility ID				
EPA ID Number	IND0166041	59	NAICS Code	325211
<u> </u>				
Facility Status				
File Status	Very Small Q	uantity Generator	Other Activities	
	•			•
Outstanding Issues				
Last Inspection Date	5/24/2017	5/24/2017		
Previous Violations				
	Date	Description		
Details	05/24/2017	7 Waste determination, used oil labeling, and release to the environment		

Inspection Narrative

This inspection was conducted due to a complaint received by U.S. EPA on May 29, 2024, and referred to this office on June 20, 2024 (TEMPO number 112647). According to the complainant, industrial waste is being directly dumped into the retention pond behind the line 3 building. Wastewater is also dumped from large plastic totes directly onto the ground at night so nobody can see. Dry chemicals are blown outdoors with no filtration. Upon arrival at the facility, IDEM staff met with Mr. Jack Shrader and explained the nature and purpose of the inspection.

OTECH Corporation is a PVC compounding manufacturer with the end product being a small plastic pellet. The pellets are then sold to other industries to be used in electrical wire and cable, footwear, housewares, roofing, agricultural parts, and automotive manufacturing. They currently employ approximately 80 employees on two (2) 12-hour shifts depending on the production schedule. The facility is notified as a very small quantity generator.

A facility walk-through was completed and included the maintenance area, rubber section, product & lab storage, building 6, lines 1, 2, and 3, lines 5 and 9, truck fill, raw materials, and finished goods. Two containers that had been accumulating for the past two (2) years of waste Rydlyme were observed in Building 6. According to the safety data sheet for Rydlyme,

it contains 5-9% hydrochloric acid and has a pH of <3. Mr. Shrader was unsure what the pH of the spent solution was but stated that it is diluted 50% in water.

Outside of the line 5 & 9 building is a baghouse to capture emissions for its carbon black operations. There was material on the concrete pad under the unit and also on the ground. Mr. Shrader stated that this was due to there being no slide gate to isolate the bag house when the dust collection container is changed out. He further stated that he has been in contact with the engineering firm that designed the system to work on a solution.

Located outside near the bag house for lines 2 & 3 was an open container of mop water. According to Mr. Shrader, it should not be there, and he instructed a maintenance worker to move it inside to the water treatment unit. During the previous inspection, a waste determination was conducted on the mop water. The mop water was determined to be non-hazardous. The facility uses a floor mopper machine to clean the floors. Mr. Shrader stated that the mop water is typically emptied into a sump and pumped to a treatment system to remove the solids and the water is collected in totes and reused. If there is a backlog, the dirty mop water may be stored in totes prior to treatment. There was material on the concrete pad under the bag house and also on the ground. The boot connecting the bag house to the collection container was damaged allowing emissions to escape.

The exterior of the facility was observed from other doorways and overhead doors. No other outside areas were observed to have signs of routine discharges of dust or powder. The detention pond was observed and did not appear to be impacted by the routine discharges of dust, powder, or dirty mop water. Stormwater was observed in one truck bay. There was no powder or dust observed in the stormwater. Mr. Shrader did state that they do use compressed air within the facility to clean equipment and under equipment but that the clean-up waste is not directed to outside the facility.

At the time of the inspection, violations were observed. These violations and their required actions are detailed in the Description of Violation(s) section below

Regulatory Status			
Observed Activity	Undetermined	Other Activities	
Documents Reviewed	SDS for Rydlyme		
Comments			

Waste Management							
Comments:							
Waste Stream(s) Info	rmatio	n					
Waste Streams Yes No	Not Ins	pected C	Not Applica	able			
List waste stream(s) infor longer generated, signific					Report (Example: additio	nal waste	e streams, waste streams no
EPA Waste Codes	Descr	ription	Source		Generation Rate		Disposition
Used Oil	Used	oil	Facility maintenance		330-660 gallons per y	ear	Safey-Kleen Systems, Inc.
D001, D002, D003	_	Organic Outdated, unwant chemicals		unwanted	< 10 pounds per year		DLD Environmental Services, Inc.
Needs waste determination	Rydlyi waste		Descaling	equipment	approx. 350 gallons accumulated over 2 years	ears	Not disposed yet
Exempted/Excluded	0	Yes 🖲 No	Not Ir	nspected (Not Applicable		
Explanation	planation						
Waste Management A	Areas						
Container Manageme	ent Area	a(s)	es 🖺 No	Not ins	pected 🔘 Not applica	able	
EPA Waste Codes		Location	Number	Size	Type of Container		

Used Oil Building 6	3	275-gallon	Plastic			
Needs waste determination Building 6	2	275-gallon	Plastic			
Satellite Area(s)	o 🖺 Not ii	nspected C	Not applicable			
Tanks, Restricted Waste Sites, and Oth Yes No Not inspected	ner Regulat Not applica	ed Units able				
Environmental Releases						
Visible Releases/Contamination/Disch	arges	Yes O N	o Release Observe	ed		
Location/Appearance		ninant/Sourc	ce]		
Outside by building lines 5 & 9- black du			ouse dust collector			
Outside by building lines 2 & 3- white du		use dust colle				
, ,						
P2 Information	Com	pliance Assi	istance			
The following P2 suggestions could possibly sassessment, or a voluntary technical assistan	ce consultation	on from IDEM s				
http://www.in.gov/idem/5298.htm for additiona	l information. C Yes	No				
Solitate by IDEM OF FIA Requested						
P2 Suggestions						
Cuidonas Matarials						
Guidance Materials Guidance Materials Provided to Facilit	v					
	y					
		Checklist				
	Checked box	indicates a con	npliance concern)			
Standards ✓ Hazardous Waste Determination			Permit Requiremen DF Permit Requiren			
Recordkeeping (SQG and LQG)			ner Violation	none		
☐ Identifying Hazardous Waste Number	ers (SQG an		ior violation			
Generator Category Determination						
☐ Notification (SQG, LQG, Transporter, TSDF)						
Release to the Environment, Disposal of Solid Waste						
☐ Illegal Dumping						
Other Violation						
LQG Hazardous Waste Standards		1				
Accumulate for 90 Days or Less		and the same of th	azardous Waste St cumulate for 180 Da			

Cathy Csatari

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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 Property Line	Central Accumulation Area Inspections
	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
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	Required Equipment
Monitoring	☐ 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	

Universal Waste – All Facilities Universal Waste Labeling	Used Oil – All Facilities ☐ Rebuttable Presumption Applies
Final Disposition	Clean Water Act
_	
Free Liquids Management Documentation	☐ Free Liquids Management ☐ Documentation
No Free Liquids	No Free Liquids
Accumulation Time	Accumulation Time
Labeling	☐ Labeling
Closed Containers	Closed Containers
Solvent-Contaminated Wipes – Disposal Container Management (Non-leaking containers)	Solvent-Contaminated Wipes - Laundered or Dry Cleaned Container Management (Non-leaking containers)
	☐ Other Violation
Other Violation	6,000 kg)
☐ Preparedness and Prevention	Emergency Procedures (Accumulates Greater than
Recordkeeping	☐ Emergency Procedures (Accumulates 6,000 kg or Less)
☐ Tank Labeling and Recordkeeping	Emergency Preparedness and Response
Container Labeling	Documentation of Legitimacy Determination
Accumulation Prohibitions	Notice
Accumulate for 60 Days or Less	☐ Speculative Accumulation
Episodic Generation Notification EPA ID Number	Hazardous Secondary Materials ☐ Reclaimed Under Control of the Generator ☐ Contained
	1
☐ Excess Generation	
☐ Preparedness and Prevention	
☐ Container Marked with Indication of Hazards	
Container Labeled "Hazardous Waste"	
Containers Closed	
☐ Incompatible Wastes	
Compatibility with Container	
Container Condition	
Quantity Limits, Point of Generation, Under Control of Operator	Manifest and Recordkeeping - LQG and SQG Manifest General Requirements Use of the Manifest
Satellite Accumulation – SQG and LQG	Manifest and Recordkeeping - LQG and SQG
Large Quantity Generator - Other Violations	
Land Disposal Restrictions	
Notification for Closure	

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 of Violation(s)

STANDARDS

HAZARDOUS WASTE DETERMINATION

CITATION:

40 CFR 262.11: A person who generates a solid waste must determine if that waste is a hazardous waste.

DETAILS:

Two containers of waste Rydlyme were observed in Building 6 (see photo 1 in the attached photo table). According to the safety data sheet for Rydlyme, it contains 5-9% hydrochloric acid and has a pH of <3. Mr. Shrader was unsure what the pH of the spent solution was but stated that it is diluted 50% in water.

REQUIRED ACTION:

Determine whether the aforementioned waste is hazardous as defined by 40 CFR 261. Submit documentation to this office in support of the determination, including any analyses performed. Additional violations may be cited based on the results of the waste determination.

RELEASE TO THE ENVIRONMENT, DISPOSAL OF SOLID WASTE

CITATION:

IC 13-30-2-1(4) A person may not deposit or allow the deposit of any contaminants or solid waste upon the land, except though the use of sanitary landfill, incineration, composting, garbage grinding, or another method acceptable to the board.

DETAILS:

Material was observed on the ground and on the concrete pad of the bag house for lines 2 & 3 (see photo 4 in the attached photo table). The boot connecting the bag house to the collection container was damaged allowing emissions to escape.

Outside of the line 5 & 9 building is a baghouse to capture emissions for its carbon black operations. There was material on the concrete pad under the unit and also on the ground (see photo 2 in the attached photo table). Mr. Shrader stated that this was due to there being no slide gate to isolate the bag house when the duct collection container is changed out.

REQUIRED ACTION:

The facility shall take steps to ensure that contaminants are not discharged at the facility. Clean up all visibly contaminated areas. Dispose of all contaminated wastes properly. Submit photo documentation that the areas have been cleaned.

Inspection Documentation				
Photographs	YesNo			
Мар	© Maps			
GPS Location Collected	○ Yes No			
Analytical Screening Conducted	○ Yes No			

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	C Yes	
Lab Sample	No No No	

	Inspection Results/Actions
Comments:	
Inspection R	Results
Violations we	ere discovered and require a submittal.
Multi-Media	Concerns
No concerns	noted

Finalize Inspection			
Written Summary of Inspection	Notice of Inspection and Verbal Summary Provided		
Inspector Information	Printed/Typed Name	Cathy Csatari	
	Phone Number:	(574) 274-7130	
	Email Address:	ccsatari@idem.in.gov	
	Signature:	Obtained on the Inspection Verification/Findings Form	
Printed/Typed N		Jack Shrader	
Facility Representative Signature	Signature:	Obtained on the Inspection Verification/Findings Form	

Photo Table



Number	1
Description	Two (2) containers of spent Rydlyme solution located in building 6
Photographer	Cathy Csatari
Facility Name	OTECH Corporation
Photo Date	6/26/2024
Others	Mr. Jack Shrader- OTECH Corporation



Number	2
Description	Carbon black dust that has escaped the dust collector located outside of building lines 5 & 9
Photographer	Cathy Csatari
Facility Name	OTECH Corporation
Photo Date	6/26/2024
Others	Mr. Jack Shrader- OTECH Corporation



Number	3
Description	Open container of non- hazardous mop water. At the time of the inspection, Mr. Shrader had instructed staff to move the container inside
Photographer	Cathy Csatari
Facility Name	OTECH Corporation
Photo Date	6/26/2024
Others	Mr. Jack Shrader- OTECH Corporation



Number	4	
Description	Open container due to a damaged boot connection allowing dust to escape to the environment behind building lines 2 & 3	
Photographer	Cathy Csatari	
Facility Name	OTECH Corporation	
Photo Date	6/26/2024	
Others	Mr. Jack Shrader- OTECH Corporation	



Number	5	
Description	Photo of the detention pond	
Photographer	Cathy Csatari	
Facility Name	OTECH Corporation	
Photo Date	6/26/2024	
Others	Mr. Jack Shrader- OTECH Corporation	



Number	1	
Description	Label for the Rydlyme descaler	
Photographer	Cathy Csatari	
Facility Name	OTECH Corporation	
Photo Date	6/26/2024	
Others	Mr. Jack Shrader- OTECH Corporation	



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 26 2024 an inspection of 6 Tech the undersigned representative of the Indiana Department of Environment	vironmental Management (IDEM	was conducted by f), Office of Land Quality.
Type of Inspection (may include more than one):		
☐ Routine Compliance Evaluation ☐ Follow Up Inspection ☐ Compliance Assistance Inspection		eening Evaluation
Inspection Findings: These findings are considered preliminary and identify specific designated agent of IDEM believes may be a violation of a statu		
No violations were discovered with respect to the particular in Violations were discovered but corrected during the inspection Violations were discovered and require a submittal from you Violations were discovered and may subject you to an appropriate Additional information/review is required to evaluate overall Other/Comments (attachment may be included):	ion. u and/or follow-up inspection by opriate enforcement response. ll compliance.	
*****************	*******	*********
Confidential Information In accordance with 329 IAC 6.1 (http://www.in.gov/legislative department for which confidential treatment is requested shall information. A person may request confidential treatment of the department, such as inspections. The written claim for conformation must be submitted to the commissioner within fit confidential is acquired by the department. A person submitted information and the supporting information to which the claim identify all confidential claim materials. Confidential information charts, photographs, or samples (see definition of information information acquired during this inspection does with IC 13-14-5 an oral report of the inspection winspection. The oral report includes any specific matters discovery violation of a law or of a permit issued by the department. The refact that indicates an intentional, a knowing, or a reckless violation.	all make a written claim of conficinformation at the time the information accordance with tive (5) working days from the titing a claim of confidentiality slaim applies in a manner that is sufficient at 329 IAC 6.1-2-8). The und does not (check one) contain of information acquired during the was provided to the undersigned of the control of the thorough the inspection that the report does not include matters not the control of the control of the undersigned	identiality at the time of submittal of the formation is acquired through the actions of boad, but must be sufficiently clear to allow 329 IAC 6.1-4-1(d), supporting time the information claimed as hall designate and segregate the afficiently clear to allow the department to mited to) written or printed material, maps, tersigned Owner/Representative has alleged confidential information. A check in the this inspection. Dwner/Agent at the conclusion of the te IDEM representative believes may be a
Cathy Csatari	1 Ch	<u> 6 26 2024</u>
Printed Name Signature (574) 274-7130 Phone Number Email	em.in.gov	Date 9-49w9:42av Time In/Out
Owner/Representative: Sack Shrader Printed Name 219 - 1295 - 1298 Signature	adar & OTECH COM	Moint, Mrigr mounds 4/24/28

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