Message

From: Lee, Jae [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6E8957DA9F254AAB83632814F05D1CD2-JLEE10]
Sent: 3/2/2017 4:45:53 PM
To: NADDY, JOHN [JNADDY@idem.IN.gov]
Subject: RE: Tradebe Inspection

Thanks John, this is also very helpful.

Jae

From: NADDY, JOHN [mailto:JNADDY@idem.IN.gov]
Sent: Thursday, March 02, 2017 10:40 AM
To: Lee, Jae <lee.jae@epa.gov>
Subject: RE: Tradebe Inspection

Jae-

The inspection reports are included in the IDEM Virtual File Cabinet (VFC). Both full RCRA inspections and focused inspections have been conducted at the site. The unit is an exempt unit and would not be a fully regulated unit that you would expect to be fully inspected on a regular basis. Without researching the individual inspection reports, it would be difficult to say definitively that the unit was inspected or not inspected and when it was inspected.

What is covered by an inspection should be included in the scope of the inspection in the inspection report. That said, given the nature of the inspection reports, if the SDS is not mentioned in the narrative it could mean that it was not inspected, nothing notable was observed, or no violations were noted. Once again, being an exempt unit, the SDS would most likely be 'inspected' based upon the fact that the wastes entering the unit are fully regulated and the wastes exiting the unit are fully regulated.

Tradebe is a big site with a lot going on. I know that as an inspector, I did not heavily document issues that were not problematic.

Sorry I cannot give you better information. Without reviewing all of the inspection reports, that info is not readily available. Here is a link to the IDEM VFC.

http://vfc.idem.in.gov/DocumentSearch.aspx

John Naddy
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Compliance and Response Branch
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Indiana Department of Environmental Management
317-233-0404

From: Lee, Jae [mailto:lee.jae@epa.gov]
Sent: Thursday, March 02, 2017 10:07 AM
To: NADDY, JOHN
Subject: FW: Tradebe Inspection

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John,

As you might know, ETC indicated that Tradebe has not been inspected regularly (i.e., every two years). So HQ asked me some information about the inspection list.

The below is my response to the HQ.

One question is that whether these State inspections have included the thermal desorption unit that is being challenged and currently being exempted from RCRA permit.

Can you confirm whether the TDU was or was not included in the State inspection?

Jae

From: Lee, Jae
Sent: Thursday, March 02, 2017 9:03 AM
To: Galbraith, Michael <Galbraith.Michael@epa.gov>
Cc: Chow, Kevin <chow.kevin@epa.gov>; Valentino, Michael <valentino.michael@epa.gov>; Setnicar, Mary <setnicar.mary@epa.gov>; Cunningham, Michael <cunningham.michael@epa.gov>
Subject: RE: Tradebe Inspection

RCRAinfo indicates that State has conducted CEI (Compliance and Evaluation Inspection) on 9/22/16, 1/7/16, 5/12/15, 10/15/14, 11/05/13, 9/27/13, 6/14/12, 6/21/11, 3/30/11, 12/17/09, 3/03/09 ….

The evaluation list is attached.

It is not known whether these inspection ever included the TDU areas, but most unlikely since the TDU is RCRA-exempted unit. I can check with IDEM inspector for this.

Do you also need an Air Inspection dates done by Air program?

Jae

From: Galbraith, Michael
Sent: Wednesday, March 01, 2017 1:08 PM
To: Lee, Jae <lee.jae@epa.gov>
Subject: RE: Tradebe Inspection

Thanks jae!

Mike Galbraith
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From: Lee, Jae
Sent: Wednesday, March 01, 2017 1:39 PM
To: Galbraith, Michael <Galbraith.Michael@epa.gov>
Cc: Valentino, Michael <Valentino.Michael@epa.gov>
Subject: Tradebe Inspection

I am contacting with IDEM inspector how many inspection have been conducted over years.

And whether the inspection includes the exempted TDU.

I think the NEIC conducted an inspection on 11/3-7, 2014.

I will let you know when I have more information for this.

Jae