

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:)	Docket No.
)	
Summit, Inc.)	Proceeding to Assess a Civil Penalty
6901 West Chicago Avenue)	Under Section 3008(a) of the Resource
Gary, Indiana)	Conservation and Recovery Act,
)	42 U.S.C. § 6928(a)
U.S. EPA ID #: INX 000 028 902)	
)	RCRA-05-2014-0006
Respondent.)	

Complainant's Rebuttal Prehearing Exchange

Complainant files Rebuttal Prehearing Exchange in response to Respondent's Prehearing Exchange filed on September 9, 2014.

On June 10, 2014, this Court issued a Prehearing Order which required that the Respondent provide a copy of all documents and exhibits intended to be introduced into evidence and specifically numbered (Section IV.A.2); a copy of a curriculum vita or resume for each identified expert witness (Section IV. A. 2); a narrative explaining in detail the legal or factual basis for any affirmative defense (Section IV.C.1); and a detailed explanation of the legal and/or factual bases for any other assertions in the Answer defending against the factual allegations in the complaint. On August 14, 2014, this Court granted Respondent a thirty day extension, until September 8, 2014, to file its prehearing exchange.

Complainant cannot file a complete rebuttal prehearing exchange because Respondent's prehearing exchange is in substantial violation of the Prehearing Order. Respondent identified two witnesses as potential expert witnesses – Patrick Gorman and Joyce Casillas. It did not submit a resume or curriculum vitae for either witness.

Respondent submitted no documents with its prehearing exchange. Instead, it broadly refers to "Any and all documents referred to and listed in Summit's '30 day response' dated April 15, 2014...." Respondent's "30 day response" refers to documents which have not been supplied. For example, Respondent refers to a spill Prevention Control and Countermeasures (SPCC) plan as the basis for a defense. Respondent's "30 day response", p. 2, Count 6. There is no copy.

Respondent included in its "30 day response" a copy of a December 16, 2011, letter from the Indiana Department of Environmental Management (IDEM). That letter includes references to violations of the Indiana Storm Water rule and the handling of PCB capacitors. Respondent has also included copies of emails related to Storm Water compliance. In addition to not providing copies of the referenced documents there is no logical reason and no explanation of the relevance of these documents to this proceeding.

Respondent included a copy of the October 7, 2011, IDEM Trip Report. It in turn references a July 17, 2010, IDEM violation letter. No copy is included. Respondent included a May 4, 2010 inspection violation letter. It in turn references a letter received on July 20, 2010, and spill incident reports dated May 11, 2006 and February 8, 2005. None of these documents are included.

The Prehearing Order directed the Respondent to provide a narrative explanation of the legal and factual basis for any of its defenses and assertions. Respondent's prehearing exchange does not address this requirement. This deficiency is compounded by the vague nature of its "30 day response." For example, in response to Counts 1-4 the Respondent's "30 day response" the Respondent offers an affirmative defense that the hazardous wastes are not solid wastes because

they were used as a substitute for a commercial chemical product or were recycled. There is no factual or legal explanation in either the "30 day response" or the prehearing exchange for this assertion.

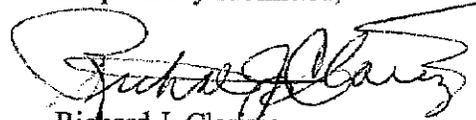
At this time, given the vague nature of Respondent's prehearing exchange, Complainant offers the following in rebuttal to the Respondent's prehearing exchange:

1. Complainant may call Maureen E. O'Neill as a potential fact witness. Mrs. O'Neill is a civil investigator employed by USEPA, Region 5. Mrs. O'Neill may testify about her review and research of publicly available information, including but not limited to Lexis-Nexis and CLEAR databases. Her testimony may include information related to and/or in rebuttal to the credentials and proposed testimony of the Respondent's proposed witnesses and/or its proposed exhibits. She may provide documents in rebuttal to those identified in or related to Respondent's prehearing exchange or subsequently produced by Respondent.
2. Complainant adds documents attached and indexed as additional exhibits which may be used in either rebuttal or as part of the initial prehearing exchange.

Complainant reserves the right to supplement this Rebuttal Prehearing Exchange when the Respondent files a complete Prehearing Exchange. The Complainant reserves all rights it may have pursuant to the Consolidated Rules of Practice to independently supplement its Prehearing Exchange or file appropriate motions, including but not limited to, motions in limine, motions for default or for accelerated decision.

Further, Complainant does not state.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard J. Clarizio", with a date "9/19/14" written to its right.

Richard J. Clarizio
Counsel for Complainant

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

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6901 West Chicago Avenue)	Under Section 3008(a) of the Resource
Gary, Indiana)	Conservation and Recovery Act,
)	42 U.S.C. § 6928(a)
U.S. EPA ID #: INX 000 028 902)	
)	RCRA-05-2014-0006
Respondent.)	

CERTIFICATE OF SERVICE

I certify that Complainant's Rebuttal Prehearing Exchange was sent this day to the addressees as listed below in the manner specified below :

By email of original PDF to OALJfiling@epa.gov and Original and one copy by UPS overnight delivery to:

Sybil Anderson
Headquarters Hearing Clerk
U.S. EPA, Office of Administrative Law Judges
1300 Pennsylvania Avenue, NW
Room M-1200
Washington, D.C. 20460

By email of original PDF to OALJfiling@epa.gov and One copy by UPS overnight delivery to:

M. Lisa Buschmann, Administrative Law Judge
U.S.EPA, Office of Administrative Law Judges
Mail Code 1900R
1300 Pennsylvania Avenue, NW
Room M-1200
Washington, D.C. 20460

By UPS overnight delivery to:

Mark A. Thiros, Esq.
Thiros & Stracci, P.C.
200 East 90th Drive
Merillville, Indiana 46410-8102



Elizabeth Rosado
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard (C-14J)
Chicago, Illinois 60604
(312) 886-1432

Dated: _____

CX 40



Karen Freeman-Wilson
Mayor

B.R. Lane
Chief of Staff

CITY OF GARY
Department of
Green Urbanism/Environmental Affairs
839 Broadway, N206
Gary, Indiana 46402
(219) 882 3000 / Fax (219) 882 3012

Lauren E. Riga, Director
lriga@ci.gary.in.us
Peter C. Julovich, Manager
Air Quality Control
pjulovich@ci.gary.in.us

March 20, 2013

Certified Mail: 7012 1010 0000 7245 3931

Jason R. Krawczyk
Indiana Department of Environmental Management
IDEM, Office of Air Quality
MC 61-53, IGCN 1003
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

**City of Gary Comments on Summit, Inc
Draft FESOP 089-32609-00529
Green Urbanism/Environmental Affairs
Attention: Lauren E. Riga, Director
839 Broadway N206
Gary, Indiana 46402**

On behalf of the City of Gary, the Gary Department of Green Urbanism/Environmental Affairs, is expressing opposition to the issuance for a FESOP permit by the IDEM Office of Air Quality section to Summit, Inc to operate their vehicle/metal shredder at the automotive salvage facility in Gary, Indiana. In addition to expressing opposition to the granting of this permit to Summit, the City of Gary requests that the IDEM re-issue the public comment period notice for another 30 days, that the permit application document be made available at the DeBois Branch (Gary Main Public Library is closed), and that the IDEM office relocated from Merrillville Office to Valparaiso allowing all parties to address their concerns regarding the proposed permit.

The reasons for the City of Gary opposition are as follows:

1. Technical Public Notice error:
 - a. The IDEM public notice letter dated February 20, 2013 stated two locations in the newspaper that now are currently closed and documents not available at both locations for public review
2. General Comment:
 - a. Shredder facility lacks pollution control equipment to address the visibility safety hazards. Pollution prevention (PP) control requirement is needed at the shredder process;
 - b. Summit needs to maintain low storage volumes of "fluff" and install sometime of fire suppression system to prevent a November 19, 2011 event of another fire.



- c. Until these major safety and health issues are addressed and achieved, the permit must be denied.

3. Background:

- a. Recently, on January 16, 2013, the shredder visible emission plume reached Industrial Highway and created visibility safety hazards.
- b. The same shredder plume had caused issues; numerous past complaints from the airport tower: landing/take off scenarios. Specifically, visible plume from shredder interfered with airport operations on September 9, 2010.
- c. The same shredder poses potential explosions as experienced in the past and on January 16 by a city employee. Boeing Corporation reported explosions back on October 14, 2010.
- d. Onsite storage of large quantities of automotive "fluff" caught on fire in November 19, 2011 and required two days to extinguish. (See attached article from NWI Times)

On behalf of the City of Gary, the Gary Department of Environmental Affairs, is expressing opposition to the issuance for a FESOP permit by the IDEM Air Quality Permit section to Summit, Inc to operate the shredder without a pollution control device that can address the safety issues and visible emission problems at their shredder facility in Gary, Indiana. In addition to expressing opposition to the granting of this permit without controls to Summit, the City of Gary requests that the IDEM re-issue the public comment period for 30 days, that the permit application document be made available at the DeBois Public Library, and that the IDEM hold a public hearing in Gary to allow all parties to address their concerns regarding the proposed permit.

CX 41



CITY OF GARY
 DEPARTMENT OF ENVIRONMENTAL AFFAIRS
 2013 INSPECTION SUMMARY REPORT

January 22, 2013

Mr. Peter Coulopoulos
 Summit, Inc.
 6901 Chicago Avenue
 Gary, Indiana 46406

Re: Inspection Summary
 Summit, Inc.
 Gary, Lake County 46406

Dear Mr. Coulopoulos:

On January 16, 2013, representative of the Gary's Department of Environmental Affairs – Air Quality Control (GDEA) conducted a surveillance to determine compliance with Air Quality Control Ordinance Chapter 90 rules. For your information, a summary of the inspection is provided below.

Company Name: Summit, Inc.(Gary Operations)
 Company Location: 6901 Chicago Avenue
 Gary, Indiana 46406

Type of Inspection: Annual Commitment
 Local Permit
 X...Surveillance
 Complaint
 Other

Results of Inspection: X Not in compliance at time of inspection
 Further inspection may be necessary
 Review of records or more information
 necessary to determine compliance
 X...Out of compliance with the following: Municipal
 Code 90.65 (b) Nuisance – at 1:30 PM, operating
 shredder in a unsafe manner to cause process
 emissions to cross a highway and obscure visibility
 at10 percent (%) opacity during vehicle travelling in
 both directions.

Recommended Action: Renew Permit(s)
 None
 X Refer to City Law Department for code enforcement
 Other: 90.65 (b)

Comments: IDEM NWRO has been notified regarding the inspection results.

Inspector Information: *Peter Julovich*
 Peter Julovich, Mgr AQC

enclosed: AQC ORD Chapter 90.65

§ 90.65 ABATEMENT OF NUISANCE.

(A) It is unlawful for any person to permit or cause the emission of quantities of air contaminants from whatever source in such a place or manner as to be detrimental to any person or to the public or to endanger the health, comfort, or safety of any person or the public, or cause or have a tendency to cause injury or damage to property or business. Each day wherein a violation of this section occurs shall constitute a separate offense. Any act or emission of air contaminants from any single or multiple source in violation or excess of the limitations established in this chapter is declared a public nuisance and shall be unlawful, and may be ordered abated by the Chief. Abatement may be in addition to the fines and penalties herein provided.

(B) It shall be unlawful for any person to cause or permit the handling, transporting, or disposition of any substance or material which is likely to be scattered by the wind, or is susceptible to be wind-borne, without taking reasonable precautions or measure to minimize atmospheric pollution. It shall be unlawful for any person to operate or maintain, or cause to be operated or maintained, any premises, open area, right-of-way, storage pile of materials, vehicle, or construction, alteration, demolition, or wrecking operation, or any other enterprise, which involves any material or substance likely to be scattered by the wind, or susceptible to being wind-borne, without taking reasonable precautions or measures to minimize atmospheric pollution. No person shall maintain or conduct, or cause to be maintained or conducted, any parking lot, or automobile or truck sales lot, or use any roadway unless the lot or roadway is maintained in such a manner as to minimize atmospheric pollution.

(C) Nothing in any section of this chapter relating to regulation of emission of air contaminants shall in any manner be construed as authorizing or legalizing the erection or maintenance of a nuisance.
('60 Code, § 8-1306.11) (Ord. 3765,
passed - - -; Am. Ord. 4232, passed - - -)
Penalty, see § 90.99

CX 42



CITY OF GARY
DEPARTMENT OF ENVIRONMENTAL AFFAIRS
2013 INSPECTION SUMMARY REPORT

January 22, 2013

COPY

Mr. Peter Coulopoulos
Summit, Inc.
6901 Chicago Avenue
Gary, Indiana 46406

Re: Inspection Summary
Summit, Inc.
Gary, Lake County 46406

Dear Mr. Coulopoulos:

On January 16, 2013, representative of the Gary's Department of Environmental Affairs – Air Quality Control (GDEA) conducted a surveillance to determine compliance with Air Quality Control Ordinance Chapter 90 rules. For your information, a summary of the inspection is provided below.

Company Name: Summit, Inc.(Gary Operations)
Company Location: 6901 Chicago Avenue
Gary, Indiana 46406

Type of Inspection: Annual Commitment
 Local Permit
X...Surveillance
 Complaint
 Other

Results of Inspection: X Not in compliance at time of inspection
 Further inspection may be necessary
 Review of records or more information
 necessary to determine compliance
X...Out of compliance with the following: Municipal
 Code 90.65 (b) Nuisance – at 1:30 PM, operating
 shredder in a unsafe manner to cause process
 emissions to cross a highway and obscure visibility
 at 10 percent (%) opacity during vehicle travelling in
 both directions.

Recommended Action: Renew Permit(s)
 None
X Refer to City Law Department for code enforcement
 Other: 90.65 (b)

Comments: IDEM NWRO has been notified regarding the inspection results.

Inspector Information: Peter Julovich
Peter Julovich, Mgr AQC

enclosed: AQC ORD Chapter 90.65

CX 43



CITY OF GARY
 DEPARTMENT OF ENVIRONMENTAL AFFAIRS
 2012 INSPECTION SUMMARY REPORT

September 4, 2012

Mr. Peter Coulopoulos
 Summit, Inc.
 6901 Chicago Avenue
 Gary, Indiana 46406

COPY

Re: Inspection Summary
 Summit, Inc.
 Gary, Lake County 46406

Dear Mr. Coulopoulos:

On August 24 and September 4, 2012, representative of the Gary's Department of Environmental Affairs – Air Quality Control (GDEA) conducted a surveillance to determine compliance with Air Quality Control Ordinance Chapter 90 rules. For your information, a summary of the inspection is provided below.

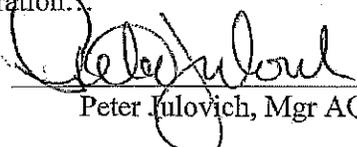
Company Name: Summit, Inc.(Gary Operations)
 Company Location: 6901 Chicago Avenue
 Gary, Indiana 46406

Type of Inspection: Annual Commitment
 Local Permit
 X...Surveillance
 Complaint
 Other

Results of Inspection: In compliance at time of inspection
 X...Further inspection may be necessary
 Review of records or more information
 necessary to determine compliance
 X...Out of compliance with the following: Municipal
 Code 90.20 Installation Permit – operating without
 requesting an installation permit from Department
 of Environmental Affairs

Recommended Action: Renew Permit(s)
 None
 Refer to City Law Department for Collection
 Other:

Comments: Summit must file for an installation permit per 90.20 before obtaining certificates of operation.

Inspector Information: 
 Peter Julovich, Mgr AQC

enclosed: AQC ORD Chapter 90.20

CX 44

Fire Fighters Battle Blaze at Summit November 19, 2011



November 19, 2011 2:30 pm • [By Susan Erler susan.erler@nwi.com](mailto:susan.erler@nwi.com), (219) 662-5336

GARY | Heavy, dark smoke from a blazing pile of scrap auto parts billowed over Gary's West Side on Saturday, hampering visibility on some roads and forcing a nearby business to evacuate.

Nobody was believed injured, firefighters at the scene said. It's not yet known how the fire started.

The fire erupted early Saturday in a two-story mound of pulverized foam insulation, dashboard material and other scrap auto parts at Summit Inc., 6901 Chicago Ave.

Gary Battalion Fire Chief M.C. Pritchett said the fire was reported about 7:30 a.m. but may have smoldered for some time before erupting. Twelve hours later, he said firefighters still were working to put out the blaze, though they had gotten it under control.

"It just looks like we're going to be out there all night and maybe another day," Pritchett said Saturday evening. "It's what we call a surround and drown. Because it's not going anywhere, and you're not either."

Fire Fighters Battle Blaze at Summit November 19, 2011

In the morning when firefighters arrived, Pritchett said flames were shooting from the junk pile.

Firefighters from the Gary, Lake Ridge, New Chicago and East Chicago departments contained the blaze by about midday, Pritchett said.

Billowing smoke could be seen for miles and at times hindered visibility on a stretch of Industrial Boulevard near the junkyard. A nearby trucking business was evacuated, Pritchett said, and representatives from the U.S. Environmental Protection Agency were at the scene taking air and water samples.

The scrap yard containing hundreds of rusting automobiles and several large mounds of crushed parts has been the scene of fires in the past, including some requiring firefighters to remain at the site for up to a week, Pritchett said.

An employee who answered the phone Saturday at Summit Inc. said managers were on the scene of the fire and not available for comment.



November 19, 2011 2:30 pm • [By Susan Erler susan.erler@nwi.com](mailto:susan.erler@nwi.com). (219) 662-5336

Fire Fighters Battle Blaze at Summit November 19, 2011



November 19, 2011 2:30 pm • [By Susan Erler susan.erler@nwi.com](mailto:susan.erler@nwi.com), (219) 662-5336

The recent fire that started Nov. 19 and burned for two days erupted in a two-story-high mound of pulverized foam insulation, dashboard material and other auto parts. It sent a cloud of thick, dark smoke that limited visibility on nearby roads and also forced the evacuation of a nearby trucking company.

Firefighters from Gary, Lake Ridge, New Chicago, East Chicago and Griffith all fought the fire. Officials from the U.S. Environmental Protection Agency and Lake County Hazmat Team monitored air quality at the scene.

The Indiana Department of Environmental Management's emergency response team also sent someone, according to IDEM spokesman Barry Sneed. A report will be produced and turned over to IDEM's enforcement division per usual procedure, Sneed said.

Fire Fighters Battle Blaze at Summit November 19, 2011



CX 45



CITY OF GARY
 DEPARTMENT OF ENVIRONMENTAL AFFAIRS
 2011 INSPECTION SUMMARY REPORT

COPY

December 2, 2011

Mr. Peter Coulopoulos
 Summit, Inc.
 6901 Chicago Avenue
 Gary, Indiana 46406

Re: Inspection Summary
 Summit, Inc.
 Gary, Lake County 46406

Dear Mr. Coulopoulos:

On December 1, 2011, representatives of the Gary's Department of Environmental Affairs – Air Quality Control (GDEA) conducted an investigation to determine compliance with Air Quality Control Ordinance Chapter 90 rules. For your information, a summary of the inspection is provided below.

Company Name: Summit, Inc.(Gary Operations)
 Company Location: 6901 Chicago Avenue
 Gary, Indiana 46406

Type of Inspection: Annual Commitment
 Local Permit
 Surveillance
 Complaint
 Other

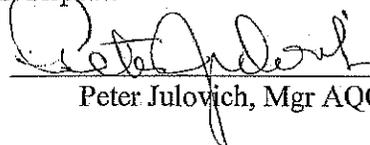
Results of Inspection: In compliance at time of inspection
 Further inspection may be necessary
 Review of records or more information necessary to determine compliance
 Out of compliance with the following: Municipal Code 90.03 State Standards – Monitoring & Record Keeping Records not available and incomplete for review at the site since operations began.

Recommended Action: Renew Permit(s)
 None
 Refer to City Law Department for Enforcement
 Other: See comments

Comments: The following reports were not current since operations began:

1. Visible emission notation for Stack 001
2. Malfunctions/Certifications
3. Fugitive dust spray logbook
4. Quarterly Fugitive Dust Reports

Inspector Information:


 Peter Julovich, Mgr AQC

CX 46

FILE # 9 9 10 6901 W Chicago Ave Visibility Concerns from Summit, Inc.
COMPLAINT



CITY OF GARY

RUDOLPH CLAY
Mayor

Department of
Environmental Affairs
839 Broadway, N206
Gary, Indiana 46402
(219) 882 3000/Fax (219) 882 3012

Dorreen Carey
Environmental Coordinator

Geraldine B. Tousant
Deputy Mayor

Peter Julovich, Manager
Air Quality Control

Check One: Complaint Information Inquiry Other

Notified by: Phone In person (observation) Letter Other

Received by: DC Given to PJ Referred to Investigated by PJ

Date (day, date, etc.) September 8, 2010 2PM

RECEIVED FROM:

NAME: Anonymous through the Gary FD (Inspector Harris)
ADDRESS: 200 East 5th Avenue
PHONE # 881-5282

NAME/ADDRESS of COMPLAINT: Summit, Inc. 6901 W Chicago Avenue, Gary

NATURE of CALL (any details): Reportedly, the complaint alleges the white cloud [emissions] from the operating equipment has caused visibility concerns at the end of the runway.

DATE of INSPECTION (manner, etc.) September 9, 2010 10 AM

INSPECTION REPORT:

On September 9, 2010, the unannounced site visit was conducted. During the inspection tour with Mr. Peter Coulopoulos, one representative from the Gary Department of Environmental Affairs [GDEA] and four [4] representatives (Messrs. Harris, Johnson, Mason & Thomas) from the City of Gary fire department observed the processing activities, specifically the crusher/shredder [wet suppression controls] system. With permission from Mr. Coulopoulos, one picture of the shredder activity was taken and the photo cannot be made available to public due to propriety sensitive areas. The photo did not show excessive emissions. The wet spray technology was observed at the shredder producing only water vapor that immediately dissipated within 100 feet – no visible emissions crossed the boundary line fence line at the time of the inspection.

INVESTIGATOR: _____ Date Signed: Sept. 9, 2010
Peter Julovich, Manager Air Quality Control

Follow-ups (if any):

When in the area, conduct a surveillance visit, Based on observation, conduct an onsite inspection.

CX 47

FILE # 10 22 10 Fugitive Dust Summit, Inc
COMPLAINT



CITY OF GARY

RUDOLPH CLAY
Mayor

Geraldine B. Tousant
Deputy Mayor

Department of
Environmental Affairs
839 Broadway, N206
Gary, Indiana 46402
(219) 882 3000/Fax (219) 882 3012

Dorreen Carey
Environmental Coordinator

Peter Julovich, Manager
Air Quality Control

Check One: Complaint Information _____ Inquiry _____ Other _____
Notified by: Phone In person (observation) _____ Letter _____ Other _____
Received by: DC Given to PJ Referred to _____ Investigated by PJ
Date (day, date, etc.) October 22, 2010

RECEIVED FROM: Dorreen Carey

NAME: Steven Landry, Interim Director Gary/Chicago Airport
ADDRESS: 6001 Industrial Hway, 46406
PHONE #: 219-949-9722

NAME/ADDRESS of COMPLAINT: Summit, Inc. 6901 West Chicago Avenue, Gary, Indiana
46406 / 219-944-9749

NATURE of CALL (any details): Dorreen Carey informed staff to inspect Summit and determine the nature of the explosion, reportedly, occurred on October 19, Tuesday. Staff contacted Mr. Landry after the inspection.

DATE of INSPECTION (manner, etc.) October 22, 2010 1:30 PM

Has the above complaint been investigated previously? : Yes
If yes, is the complaint of the same nature? : Yes
Previous Inspection Date(s): September 9, 2010
Inspector(s): PCJ

Inspector's Report

Gary/Chicago Airport is located due west of the Summit recycle complex. Investigator received the information one-week after-the-fact. Staff met with Summit representative to discuss the complaint received by our office from another department on 10/22/10. The staff informed Peter Coulopoulos, owner, that our office was notified of an October 19th explosion. Mr. Coulopoulos was not aware of an explosion two days earlier. He showed staff large pieces of solid metal not capable of being shredded and entered the system. The pieces were in the crushed cars that were delivered from other customers Mr. Coulopoulos stated he has instructed his people to examine vehicles for such items to prevent any damage to his equipment.

At 4:20 PM, Mr. Landry stated that an emergency 911 call was placed on October 15 by Boeing Corporation representative located on west-end airport property. The representative reported hearing a loud sound resembling an "explosion" and a smoke plume. Mr. Landry also stated the Boeing Corporation staff informed him the building trembled and vehicles were covered with dark material (fluff). Mr. Landry stated the explosion incident has Boeing concerned for their safety.

INVESTIGATOR: _____ Date Signed: October 27, 2010
Peter Julovich, Manager Air Quality Control

Follow-ups (if any):

CX 001383

CX 48



Rudolph Clay
Mayor

Geraldine B. Tousant
Deputy Mayor

CITY OF GARY
Department of
Environmental Affairs
839 Broadway, N206
Gary, Indiana 46402
(219) 882 3000 / Fax (219) 882 3012

Dorreen Carey
Env/MS4 Coordinator
dcarey@ci.gary.in.us
Peter Julovich
Air Quality Control Manager
pjulovich@ci.gary.in.us

Violation Warning Letter

October 27, 2010

Mr. Peter Coulopoulos
Summit, Inc.
6901 Chicago Avenue
Gary, Indiana 46406

RE: Air-Borne Fugitive Particulates
Gary, Lake County

Dear Mr. Coulopoulos:

You are hereby notified that a violation of **City of Gary Air Quality Control Ordinance Chapter 90, Section .65** was reported to our staff person of this office for the property in your charge at 6901 Chicago Avenue operations on Monday October 26, 2010. The "fluff" dust emissions from shredding vehicles and material storage activities caused a public health concern and nuisance.

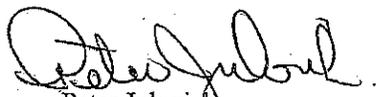
Section .65 reads as follows:

§ 90.65 ABATEMENT OF NUISANCE.

(A) It is unlawful for any person to permit or cause the emission of quantities of air contaminants from whatever source in such a place or manner as to be detrimental to any person or to the public or to endanger the health, comfort, or safety of any person or the public, or cause or have a tendency to cause injury or damage to property or business. Each day wherein a violation of this section occurs shall constitute a separate offense. Any act or emission of air contaminants from any single or multiple source in violation or excess of the limitations established in this chapter is declared a public nuisance and shall be unlawful, and may be ordered abated by the Chief. Abatement may be in addition to the fines and penalties herein provided.

You are hereby required to mitigate the fugitive dust from crossing your property line with dust control management practices immediately. Please provide this office with your plan of action. If you have any questions, please contact this office at 882.3000. Thank you for cooperation in this matter.

Sincerely,


Peter Julovich
Air Quality Control Manager

CX 49



CITY OF GARY

RUDOLPH CLAY
Mayor

Department of
Environmental Affairs
839 Broadway, N206
Gary, Indiana 46402
(219) 882 3000/Fax (219) 882 3012

Dorreen Carey
Environmental Coordinator

Geraldine B. Tousant
Deputy Mayor

Peter Julovich, Manager
Air Quality Control

Check One: Complaint Information Inquiry Other

Notified by: Phone In person (observation) Letter Other

Received by: JR Given to PJ Referred to _____ Investigated by PJ

Date (day, date, etc.) October 26, 2010 2:45 PM

RECEIVED FROM:

NAME: Swift Transportation representative –Amando Macapagal, night supervisor
ADDRESS: 6500 Industrial Hwy
PHONE #:219-944-5862 m 545-3619

NAME/ADDRESS of COMPLAINT: Summit, Inc. 6901 West Chicago Avenue, Gary, Indiana
46406 / 219-944-9749

NATURE of CALL (any details): Vehicles covered with material that looks like upholstery
fines. Stormwater run off, down-spouts had materials on the asphalt and nearby walkways. Mr.
Macapagal stated the incident occurred on October 24th fugitive particulates, which resembles
recycled materials from Summit. He stated that materials were collected to show the department.

DATE of INSPECTION (manner, etc.) October 26, 2010

Has the above complaint been investigated previously? : Yes
If yes, is the complaint of the same nature? : Yes
Previous Inspection Date(s): October 22, 2010
Inspector(s): PCJ

Inspector's Report

Swift Transportation Company is located due north of the Summit recycle complex. Mr.
Macapagal, night supervisor, collected the materials off the vehicles and placed them in a plastic
bag. I accepted the materials as part of the complaint. Based on staff's observation, the shredder
is due south of the shop area. The shredder was operating at the time of the inspection.
Subsequently, staff met with Summit representative to discuss the complaint received on
10/26/10. A portion of the Swift collected material was provided to give to Peter Coulopoulos,
owner who was not present. I suggested to Summit to mitigate the issue. The representative
stated they will work to resolve any concerns.

INVESTIGATOR: Peter Julovich Date Signed: October 27, 2010

Peter Julovich, Manager Air Quality Control

Follow-ups (if any):

CX 50

OFFICE OF AIR QUALITY
FIELD INSPECTION REPORT

File: Lake County
Thru: IRS 12/21/10

SOURCE: Summit, Inc.

PLANT ID NUMBER: 089-005420
INSPECTED BY: R. G. Massoels, &
A. Snyder

LOCATION: 6901 West Chicago Avenue

INSPECTION DATE: 11-24-10
TIME IN: 1020 TIME OUT: 1045
REPORTED BY: Richard G. Massoels

CITY: Gary

REPORT DATE: 12-16-10
ACES IDS: 124624, 124625
TEMPO ID: 18933

COUNTY: Lake

COMPLAINT INVESTIGATION: No

COMPLAINT NUMBER: N/A

NONATTAINMENT: O₃, PM_{2.5}

PERMIT TYPE: MSOP - PERMIT NUMBER: M089-25273-00529

CHECK IF APPLICABLE: NSPS ___ PSD ___ NESHAP ___ OTHER ___ (please identify) ___

PERSONS/TITLE INTERVIEWED:

Peter Coulopoulos / Owner

PHONE: 219-944-9749

EMAIL: SUMMIT3@PEOPLEPC.COM

Bennett Coulopoulos / Environmental Manager

PHONE: 219-588-1887

EMAIL: N/A

OBJECTIVES:

The objective was to conduct a complaint inspection.

Unannounced inspection

Were all relevant documents reviewed prior to the inspection: Yes

DESCRIPTION OF SOURCE:

The source is a stationary scrap metal recycling plant.

BACKGROUND:

A commitment inspection was conducted on 6-22-10. Violations were discovered at the time of the inspection which resulted in the issuance of a violation letter. The company was issued a New Source Construction and Minor Operating Permit (M089-25273-00529) on December 20, 2007. The permit expires on December 20, 2012.

PROCESS DESCRIPTION/FINDINGS/OBSERVATIONS:

We arrived at the source on the morning 11/24/10. We informed the Coulopoulos' of the complaint. Mr. Peter Coulopoulos informed us that the date in question with the explosion (10-

19-10) the plant automobile shredder was not in operation because the hammer mill was being replaced.

Mr. Bennett Coulopoulos then gave us a tour of the facility. We were told two machines were being brought in to remove product from the piles of material on site. One machine would be installed in the middle of December and the other one would be installed next year. No fugitive dust was observed escaping the property at the time of the inspection.

Hala Kuss and I called Ms. Carey and left her a voice mail regarding the results of our inspection. We also told her a copy of the inspection report would be provided to her upon its approval.

CONCLUSION:

No violations were discovered at the time of the inspection.

RECOMMENDATION:

I recommend closing out the complaint.

EXIT INTERVIEW:

I reviewed my findings, recommendation, and conclusion with Mr. Coulopolous prior to exiting the plant.



IDEM Pollution Complaint Intake Form
 Indiana Department of Environmental Management
 Revised 11/24/03



FOR IDEM STAFF USE ONLY

Source ID: N/A

Complaint #:

Source Type: 45.0

SECTION A.			
Date/Time Received: 11/9/10 9:21 am	Complaint Report Submitted by: Rick Massoels	Your Phone Number: 219-757-0290	Program Area: NWRO
Complaint Received How: phone <input type="checkbox"/> letter <input type="checkbox"/> fax <input type="checkbox"/> e-mail <input checked="" type="checkbox"/> In-person <input type="checkbox"/> web <input type="checkbox"/> other <input type="checkbox"/>			
Has this complaint been previously reported to other agencies, officials, or persons?			YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
To Whom: Gary Department of Environmental Affairs		When: Various occasions	

SECTION B.				
Type of Complainant: anonymous <input type="checkbox"/> individual <input type="checkbox"/> public official <input checked="" type="checkbox"/>				
Complainant Last Name Carey	Complainant First Name Dorreen	Work Phone # 219-882-3000	Home Phone #	
Street Address 839 Broadway, N206	County Lake	City Gary	State IN	Zip Code 46402

SECTION C.				
(Responsible Party/Pollution Source) Last Name Summit, Inc.		First Name	Work Phone # 219-9449749	Home Phone #
Street Address 6901 West Chicago Avenue	County Lake	City Gary	State IN	Zip Code 46406

SECTION D.
Exact Location of Alleged Activity (e.g. baghouse #, southwest corner of landfill, etc.) Scrap yard
How is the complainant aware of and/or affected by the alleged activity? Complaints received by the Gary Department of Environmental Affairs
Directions to Site Take Cline Avenue to Chicago Avenue exit east

SECTION E. (part 1)			
Air	Solid Waste	Industrial Waste	Drinking Water
<input checked="" type="checkbox"/> Fugitive dust	<input type="checkbox"/> Confined feeding – manure mismgmnt.	<input type="checkbox"/> Used oil	<input type="checkbox"/> Quality
<input type="checkbox"/> Open burning	<input type="checkbox"/> Open dumping of solid waste	<input type="checkbox"/> Illegal storage	<input type="checkbox"/> Quantity
<input type="checkbox"/> Odor	<input type="checkbox"/> Open dumping of special waste	<input type="checkbox"/> Mgmt. standards	<input type="checkbox"/> Maintenance
<input type="checkbox"/> Noise	<input type="checkbox"/> Open dumping used tires	<input type="checkbox"/> Health concerns	<input type="checkbox"/> Other:
<input type="checkbox"/> Opacity	<input type="checkbox"/> Septage hauler illegal	<input type="checkbox"/> Other:	
<input type="checkbox"/> Asbestos	<input type="checkbox"/> Open dumping of asbestos		
<input type="checkbox"/> Lead	<input type="checkbox"/> Other:		
<input type="checkbox"/> Tampering			
<input type="checkbox"/> Other:			

SECTION E. (part II)			
Wastewater	UST	Emergency Response	Wetlands
<input type="checkbox"/> Basement backup	<input type="checkbox"/> Unregistered tanks	<input type="checkbox"/> HazMat releases	<input type="checkbox"/> Unauthorized dumping
<input type="checkbox"/> Stream pollution	<input type="checkbox"/> Non-compliant tanks	<input type="checkbox"/> Stream pollution	<input type="checkbox"/> Bulldozing in wetlands
<input type="checkbox"/> Septic ponding	<input type="checkbox"/> Dispenser/fueling	<input type="checkbox"/> Fire/Explosion	<input type="checkbox"/> Excavation in wetlands
<input type="checkbox"/> NPDES facility failure	<input type="checkbox"/> Unregulated tanks	<input type="checkbox"/> Tire fire	<input type="checkbox"/> Dredging of rivers
<input type="checkbox"/> Other:	<input type="checkbox"/> Abandoned tanks	<input type="checkbox"/> Multimedia complaint	<input type="checkbox"/> Dredging of lakes
	<input type="checkbox"/> Other:	<input type="checkbox"/> After hours	<input type="checkbox"/> Dredging of streams
		<input type="checkbox"/> Other:	<input type="checkbox"/> Other:

SECTION F.
<p>Comments: Complainant e-mailed Hala Kuss (IDEM, NWRO Director) requesting assistance with complaints at the source. She included copies of the GDEA's inspection reports and a violation warning letter (copies enclosed) with her e-mail.</p>

SECTION G.
Will this complaint be investigated by the receiving program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
This complaint will be referred to :
<input type="checkbox"/> OAQ
<input type="checkbox"/> OWQ/Waste Water
<input type="checkbox"/> OWQ/Drinking Water
<input type="checkbox"/> OLQ/Agricultural and Solid Waste
<input type="checkbox"/> OLQ/Industrial Waste
<input type="checkbox"/> OLQ/Underground Storage
<input type="checkbox"/> OLQ/Emergency Response
<input type="checkbox"/> OWQ/Wetlands
<input type="checkbox"/> OCI (Office of Criminal Investigations)
<input checked="" type="checkbox"/> Northwest Regional Office (Merrillville)
<input type="checkbox"/> Northern Regional Office (South Bend)
<input type="checkbox"/> Southwest Regional Office (Petersburg)
<input type="checkbox"/> Pollution Complaint Clearinghouse
<input type="checkbox"/> Other:

(For Section Chief use only)	SECTION H.
Is an Inspection/Investigation required? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
This complaint will be assigned to :	
Name Rick Massoels	Phone # 219-757-0290

FILE # 9 9 10 6901 W Chicago Ave Visibility Concerns from Summit, Inc.
COMPLAINT



CITY OF GARY

RUDOLPH CLAY
Mayor

Department of
Environmental Affairs
839 Broadway, N206
Gary, Indiana 46402
(219) 882 3000/Fax (219) 882 3012

Dorreen Carey
Environmental Coordinator

Peter Julovich, Manager
Air Quality Control

Check One: Complaint Information Inquiry Other

Notified by: Phone In person (observation) Letter Other

Received by: DC Given to PJ Referred to Investigated by PJ

Date (day, date, etc.) September 8, 2010 2PM

RECEIVED FROM:

NAME: Anonymous through the Gary FD (Inspector Harris)
ADDRESS: 200 East 5th Avenue
PHONE # 881-5282

NAME/ADDRESS of COMPLAINT: Summit, Inc. 6901 W Chicago Avenue, Gary

NATURE of CALL (any details): Reportedly, the complaint alleges the white cloud [emissions] from the operating equipment has caused visibility concerns at the end of the runway.

DATE of INSPECTION (manner, etc.) September 9, 2010 10 AM

INSPECTION REPORT:

On September 9, 2010, the unannounced site visit was conducted. During the inspection tour with Mr. Peter Coulopoulos, one representative from the Gary Department of Environmental Affairs [GDEA] and four [4] representatives (Messrs. Harris, Johnson, Mason & Thomas) from the City of Gary fire department observed the processing activities, specifically the crusher/shredder [wet suppression controls] system. With permission from Mr. Coulopoulos, one picture of the shredder activity was taken and the photo cannot be made available to public due to propriety sensitive areas. The photo did not show excessive emissions. The wet spray technology was observed at the shredder producing only water vapor that immediately dissipated within 100 feet – no visible emissions crossed the boundary line fence line at the time of the inspection.

INVESTIGATOR: Peter Julovich Date Signed: Sept. 9, 2010
Peter Julovich, Manager Air Quality Control

Follow-ups (if any):

When in the area, conduct a surveillance visit, Based on observation, conduct an onsite inspection.

FILE # 10 22 10 Fugitive Dust Summit, Inc
COMPLAINT



CITY OF GARY

RUDOLPH CLAY
Mayor

Department of
Environmental Affairs
839 Broadway, N206
Gary, Indiana 46402
(219) 882 3000/Fax (219) 882 3012

Dorreen Carey
Environmental Coordinator

Geraldine B. Tousant
Deputy Mayor

Peter Julovich, Manager
Air Quality Control

Check One: Complaint Information _____ Inquiry _____ Other _____
Notified by: Phone In person (observation) _____ Letter _____ Other _____
Received by: DC _____ Given to PJ _____ Referred to _____ Investigated by PJ _____
Date (day, date, etc.) October 22, 2010

RECEIVED FROM: Dorreen Carey

NAME: Steven Landry, Interim Director Gary/Chicago Airport.
ADDRESS: 6001 Industrial Hway, 46406
PHONE #: 219-949-9722

NAME/ADDRESS of COMPLAINT: Summit, Inc. 6901 West Chicago Avenue, Gary, Indiana
46406 / 219-944-9749

NATURE of CALL (any details): Dorreen Carey informed staff to inspect Summit and determine the nature of the explosion, reportedly, occurred on October 19, Tuesday. Staff contacted Mr. Landry after the inspection.

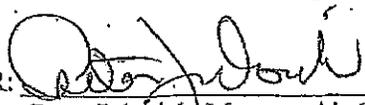
DATE of INSPECTION (manner, etc.) October 22, 2010 1:30 PM

Has the above complaint been investigated previously? : Yes
If yes, is the complaint of the same nature? : Yes
Previous Inspection Date(s): September 9, 2010
Inspector(s): PCJ .

Inspector's Report

Gary/Chicago Airport is located due west of the Summit recycle complex. Investigator received the information one-week after-the-fact. Staff met with Summit representative to discuss the complaint received by our office from another department on 10/22/10. The staff informed Peter Coulopoulos, owner, that our office was notified of an October 19th explosion. Mr. Coulopoulos was not aware of an explosion two days earlier. He showed staff large pieces of solid metal not capable of being shredded and entered the system. The pieces were in the crushed cars that were delivered from other customers Mr. Coulopoulos stated he has instructed his people to examine vehicles for such items to prevent any damage to his equipment.

At 4:20 PM, Mr. Landry stated that an emergency 911 call was placed on October 15 by Boeing Corporation representative located on west-end airport property. The representative reported hearing a loud sound resembling an "explosion" and a smoke plume. Mr. Landry also stated the Boeing Corporation staff informed him the building trembled and vehicles were covered with dark material (fluff). Mr. Landry stated the explosion incident has Boeing concerned for their safety.

INVESTIGATOR:  Date Signed: October 27, 2010
Peter Julovich, Manager Air Quality Control

Follow-ups (if any):

CX 001391

FILE # 10 26 10 Fugitive Dust Summit, Inc
COMPLAINT



CITY OF GARY

RUDOLPH CLAY
Mayor

Department of
Environmental Affairs
839 Broadway, N206
Gary, Indiana 46402
(219) 882 3000/Fax (219) 882 3012

Dorreen Carey
Environmental Coordinator
Peter Julovich, Manager
Air Quality Control

Geraldine B. Tousant
Deputy Mayor

Check One: Complaint Information Inquiry Other

Notified by: Phone In person (observation) Letter Other

Received by: JR Given to PJ Referred to _____ Investigated by PJ

Date (day, date, etc.) October 26, 2010 2:45 PM

RECEIVED FROM:

NAME: Swift Transportation representative --Amando Macapagal, night supervisor
ADDRESS: 6500 Industrial Hwy
PHONE #: 219-944-5862 m 545-3619

NAME/ADDRESS of COMPLAINT: Summit, Inc. 6901 West Chicago Avenue, Gary, Indiana
46406 / 219-944-9749

NATURE of CALL (any details): Vehicles covered with material that looks like upholstery
fines. Stormwater run off, down-spouts had materials on the asphalt and nearby walkways. Mr.
Macapagal stated the incident occurred on October 24th fugitive particulates, which resembles
recycled materials from Summit. He stated that materials were collected to show the department.

DATE of INSPECTION (manner, etc.) October 26, 2010

Has the above complaint been investigated previously? : Yes
If yes, Is the complaint of the same nature? : Yes
Previous Inspection Date(s): October 22, 2010
Inspector(s): PCJ

Inspector's Report

Swift Transportation Company is located due north of the Summit recycle complex. Mr.
Macapagal, night supervisor, collected the materials off the vehicles and placed them in a plastic
bag. I accepted the materials as part of the complaint. Based on staff's observation, the shredder
is due south of the shop area. The shredder was operating at the time of the inspection.
Subsequently, staff met with Summit representative to discuss the complaint received on
10/26/10. A portion of the Swift collected material was provided to give to Peter Coulopoulos,
owner who was not present. I suggested to Summit to mitigate the issue. The representative
stated they will work to resolve any concerns.

INVESTIGATOR: Peter Julovich Date Signed: October 27, 2010
Peter Julovich, Manager Air Quality Control

Follow-ups (if any):



Rudolph Clay
Mayor
Geraldine B. Tousant
Deputy Mayor

CITY OF GARY
Department of
Environmental Affairs
839 Broadway, N206
Gary, Indiana 46402
(219) 882 3000 / Fax (219) 882 3012

Doreen Carey
Env/MS4 Coordinator
dcarey@ci.gary.in.us
Peter Julovich
Air Quality Control Manager
pjulovich@ci.gary.in.us

Violation Warning Letter

October 27, 2010

Mr. Peter Coulopoulos
Summit, Inc.
6901 Chicago Avenue
Gary, Indiana 46406

RE: Air-Borne Fugitive Particulates
Gary, Lake County

Dear Mr. Coulopoulos:

You are hereby notified that a violation of City of Gary Air Quality Control Ordinance Chapter 90, Section .65 was reported to our staff person of this office for the property in your charge at 6901 Chicago Avenue operations on Monday October 26, 2010. The "fluff" dust emissions from shredding vehicles and material storage activities caused a public health concern and nuisance.

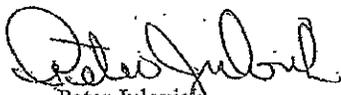
Section .65 reads as follows:

§ 90.65 ABATEMENT OF NUISANCE.

(A) It is unlawful for any person to permit or cause the emission of quantities of air contaminants from whatever source in such a place or manner as to be detrimental to any person or to the public or to endanger the health, comfort, or safety of any person or the public, or cause or have a tendency to cause injury or damage to property or business. Each day wherein a violation of this section occurs shall constitute a separate offense. Any act or emission of air contaminants from any single or multiple source in violation or excess of the limitations established in this chapter is declared a public nuisance and shall be unlawful, and may be ordered abated by the Chief. Abatement may be in addition to the fines and penalties herein provided.

You are hereby required to mitigate the fugitive dust from crossing your property line with dust control management practices immediately. Please provide this office with your plan of action. If you have any questions, please contact this office at 882.3000. Thank you for cooperation in this matter.

Sincerely,


Peter Julovich
Air Quality Control Manager



NOTICE OF INSPECTION
State Form 50890 (R3 / 11-05)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Telephone: (800) 451-6027 or (317) 232-8603

This is to notify you that on 11/24/10 an inspection of Summit, Inc. was conducted by the undersigned representative of the Indiana Department of Environmental Management (IDEM), Office of NAC.

Type of Inspection (may include more than one):

- _____
- _____
- _____
- Complaint
- Multi-Media Screening Evaluation
- Other _____

Preliminary Inspection/Screening 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.

Single Media Inspection:

- 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) _____

Multi-Media Screening (Please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

- Multi-media screening not conducted.
- No violations were discovered with respect to the limited multi-media screening conducted by IDEM.
- Potential violations were discovered but corrected during the inspection.
- Potential violations were discovered and may be further investigated.

Pollution Prevention:

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that Indiana businesses increase productivity, generate less environmental wastes, reduce their regulatory responsibilities and become more profitable. Your participation in Indiana's pollution prevention program is entirely voluntary. If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance (OPPTA) at (317) 232-8172 or (800) 988-7901, or visit OPPTA's Web site at www.idem.IN.gov/oppta/p2/. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? Yes No

Compliance Assistance:

In addition to the compliance assistance offered by IDEM's individual programs, IDEM's Compliance and Technical Assistance Program (CTAP) offers free, confidential compliance assistance to regulated entities, including small businesses and municipalities, throughout Indiana. In the future, if you would like to request free, confidential compliance assistance, call (317) 232-8172 or (800) 988-7901, or visit CTAP's Web site at www.idem.IN.gov/ctap.

A summary of violations and concerns noted during the inspection was verbally communicated to the undersigned representative during the inspection. The facility should correct any violations noted as soon as possible. Violations identified and corrected during the inspection may still be cited as violations.

A written inspection summary will be provided within 45 days. In accordance with IC 13-14-5-4, matters not evident to IDEM at the time of the inspection might not be included in either the verbal or written inspection summary.

IDEM Representative:

Printed Name	Signature	Phone Number	Date	Time
Rick Maszorski	<i>Rick Maszorski</i>	219-577-0290	11/24/10	In: 1020 Out: 1045

Owner/Agent Representative:

Printed Name	Signature	Title	Phone Number	Date
Bennett Coulopoulos	<i>Bennett Coulopoulos</i>	Environmental Mgr	219-508-1887	11/24/10



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

Northwest Regional Office

8380 Louisiana Street
Merrillville, Indiana 46410

(219) 757-0265

Toll Free (888) 209-8892

Fax (219) 757-0267

www.idem.IN.gov

January 3, 2011

Mr. Peter Coulopoulos
Summit, Inc.
6901 West Chicago Avenue
Gary, IN 46406

Re: Inspection Summary
Summit, Inc.
Plant ID Number: 089-00529
Gary, Lake County

Dear Mr. Coulopoulos:

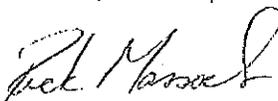
On November 24, 2010, representatives of the Indiana Department of Environmental Management, Northwest Regional Office, conducted an inspection of Summit, Inc. located at 6901 West Chicago Avenue in Gary, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

- Type of Inspection:
- Commitment
 - Surveillance
 - Complaint
 - Other
- Results of Inspection:
- No violations were observed
 - Violations were observed but corrected during the inspection.
 - Violations were observed.
 - Additional information/review is required to evaluate overall compliance.
 - Violations were observed and will result in an enforcement action.
 - Other

Mr. Peter Coulopouos
Page 2

If you have any comments or questions regarding this matter, I can be contacted at 219-757-0290. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rick Massoels".

Rick Massoels
Environmental Manager

CX 51

OFFICE OF AIR QUALITY
FIELD INSPECTION REPORT

File: Lake County *7/14/10*
Thru: JRS

SOURCE: Summit, Inc.

PLANT ID NUMBER: 089-005420
INSPECTED BY: R. G. Massoels, H. Kuss
& J. R. Simmons

LOCATION: 6901 West Chicago Avenue

INSPECTION DATE: 6-22-10
TIME IN: 1130 TIME OUT: 1315 *RCM*
REPORTED BY: Richard G. Massoels
REPORT DATE: 7-12-10
ACES ID: 119302

CITY: Gary

COUNTY: Lake

COMPLAINT INVESTIGATION: No

COMPLAINT NUMBER: N/A

NONATTAINMENT: O₃, PM_{2.5}

PERMIT TYPE: MSOP - PERMIT NUMBER: M089-25273-00529

CHECK IF APPLICABLE: NSPS PSD NESHAP OTHER (please identify) _____

PERSONS/TITLE INTERVIEWED:

Peter Coulopoulos / Owner

PHONE: 219-944-9749

EMAIL: SUMMIT3@PEOPLEPC.COM

Bevan Coulopoulos / Manager

PHONE: 219-902-0000

EMAIL: N/A

OBJECTIVES:

The objective was to conduct a commitment inspection.

Unannounced inspection

Were all relevant documents reviewed prior to the inspection: Yes

DESCRIPTION OF SOURCE:

The source is a stationary scrap metal recycling plant.

BACKGROUND:

The source used to be under the jurisdiction of the Gary Department of Environmental Affairs. The company was issued a New Source Construction and Minor Operating

Permit (M089-25273-00529) on December 20, 2007. The permit expires on December 20, 2012.

PROCESS DESCRIPTION/FINDINGS/OBSERVATIONS:

A. Permit Section D.1

1. Process Description:
Vehicles/metals are shredded, separated and sold.

2. Equipment:
One (1) vehicle/metal shredder, identified as EU002, with a maximum capacity of 100 tons per hour; one (1) Z-box cleaning system for metal/fluff separation, identified as EU001, with a maximum capacity of 100 tons per hour; one (1) conveyor system, identified as EU003, consisting of sixteen (16) conveyor transfer points, with a maximum capacity to transfer and convey 100 tons per hour.

3. Pollutants Emitted:
PM, PM₁₀, PM_{2.5}

4. Control Equipment:

Control Equipment/Identification	Exhaust to:
Three (3) water sprayer nozzles (for the vehicles/metals shredder)	To the atmosphere
Cyclone (for the Z-box cleaning system)	To the atmosphere
Water sprayers (for conveyor system)	To the atmosphere

5. Applicable Rules:
326 IAC 2-6 (Minor Source Operating Permit Program), 326 IAC 5-1 (Opacity Limitations), 326 IAC 6.8 (Particulate Matter Limitations for Lake County), 326 IAC 6-4 (Fugitive Dust Emissions)

6. Observations:
Mr. Peter Coulopolous accompanied us on the inspection. He informed us the plant had been commissioned in May of 2009, but did not actually become operational until December of 2009. The vehicle/metal shredder was in operation at the time of the inspection. No emissions were observed escaping from the process. The Z-box cleaning system was in operation at the time of the inspection. No emissions were observed escaping from the process. The conveyor system was in operation at the time of the inspection. No emissions were observed escaping from the process.

Mr. Coulopolous was unable to produce records of the visible emissions notations. Mr. Coulopolous stated the operator made the observations every morning, but did not know a record of the observations needed to be retained. He stated the omission would be corrected immediately. Also, the Affidavit of Construction has not been submitted. This is a violation of permit condition B.3.

Emission	Particulate

Limit/Standard	<p>Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), particulate emissions from EU001, EU002, and EU003 shall not exceed 0.03 grains per dry standard cubic foot (dscf) each.</p> <p><u>PM and PM10</u></p> <p>(a) PM and PM10 emissions from the one (1) vehicle/metal shredder, identified as EU002, shall not exceed 0.0109 pounds per ton of metal shredded.</p> <p>(b) PM and PM10 emissions from the one (1) Z-box cleaning system, identified as EU001, shall not exceed 0.037 pounds per ton of metal/fluff separated.</p> <p>Compliance with these limits combined with the potential PM and PM10 emissions from all other emission units at this source will limit the source-wide total potential to emit of PM and PM10 to less than 100 tons per 12 consecutive month period and will render 326 IAC 2-7 (Part 70 Permits) not applicable. PM10 emissions will be used as a surrogate for PM2.5.</p>
Prev. Maint. Plan	Prepared: Yes Available on Site: Yes Adequate: Yes
Comp. Resp. Plan	N/A
Stack Testing Reqmnts	<p>The company completed testing in June of 2010. Mr. Coulopolous stated they had been trying to test since April, but GDEA kept delaying the test. They failed to submit a test protocol to the Compliance Data Section (CDS). This is a violation of permit condition C.8. I told Mr. Coulopolous the protocol needed to be submitted and when the test results arrived, they too would need to be submitted.</p>
Comp. Monitoring	<p><u>Visible Emissions Notations</u></p> <p>(a) Visible emission notations of the stack S001 exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.</p> <p>(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.</p> <p>(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.</p> <p>(d) A trained employee is an employee who has worked at the plant at</p>

	<p>least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.</p> <p>(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.</p> <p><u>Cyclone Failure Detection</u> In the event that cyclone failure has been observed:</p> <p>Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.</p> <p><u>Water Spray System Failure Detection</u> In the event that water spray system failure has been observed:</p> <p>Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.</p>
Comp. Determination	<p><u>Particulate Control</u></p> <p>(a) Pursuant to 326 IAC 6.8-1-2, and in order to comply with Condition D.1.1, water sprayer nozzles shall be in operation and control emissions from the metal shredder (EU002) at all times that the metal shredder is in operation.</p> <p>(b) Pursuant to 326 IAC 6.8-1-2, and in order to comply with Condition D.1.1, the cyclone shall be in operation and control emissions from the Z-box cleaning system at all times the Z-box cleaning system (EU001) is in operation.</p> <p><u>Testing Requirements</u> In order to demonstrate compliance with Conditions D.1.2(a) and (b), the Permittee shall perform PM and PM10 testing for the one (1) vehicle/metal shredder, identified as EU002 and the one (1) Z-box cleaning system, identified as EU001, within 60 days after achieving the maximum production rate, but no later than 180 days after initial</p>

	startup, utilizing methods as approved by the Commissioner. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C - Performance Testing.
Record keeping	Are required records on site? No Type of records checked: visible emission notations Dates or amount of records checked: there aren't any records Are records consistent with observations? No, see observations above
Reporting	Have all required reports been submitted in a timely manner? N/A Are reports consistent with observations? N/A

7. Compliance Status:
The company was found to be out of compliance with permit condition D.1.6 and permit condition D.1.9(a) at the time of the inspection.
8. Additional Comments:
None

GENERAL SOURCE ISSUES:

- | | |
|--|-----|
| 1. Does the permit accurately represent the emission units observed? | Yes |
| 2. Have violations been documented by photographs? | No |
| 3. Were Pollution Prevention opportunities discussed? | Yes |
| 4. Per the source, are they required to have a Risk Management Plan? | No |
| If yes, does the source have a plan? | N/A |
| Have the employees been trained? | N/A |
| 5. Has the source submitted an acceptable Annual Compliance Certification for the current applicable year? | N/A |

ADDITIONAL COMMENTS:

None

CONCLUSION:

The company was found to be out of compliance with permit condition B.3 (Affidavit of Construction) for failing to complete and submit the affidavit of construction. The company was found to be out of compliance with permit condition C.8 (Performance Testing) for failing to submit a protocol no later than thirty-fives (35) days prior to the intended test date. The company was found to be out of compliance with permit condition D.1.6 (Visible Emissions Notations) and permit condition D.1.9(a) (Record Keeping Requirements) for failing to have daily records of visible emissions notations.

RECOMMENDATION:

The Enforcement Referral Guidance recommends enforcement action for these violations, but since it was a former local agency source a violation letter will be issued. I also recommend an inspection of this source be conducted in FY '11.

EXIT INTERVIEW:

I reviewed my findings, recommendation, and conclusion with Mr. Coulopolous prior to exiting the plant.

Pollution Prevention Integration Plan for OAQ Compliance Branch/Regional Offices

FIELD INSPECTION REPORT ATTACHMENT

Facility Information		
Facility Name:	<i>Summit Inc</i>	ID Number: <i>089-00528</i>
Facility Contact:	<i>Peter Coulopoulos</i>	Title:
Phone Number:	<i>219-944-9749</i>	Inspection Date: <i>6/22/10</i>

Pollution Prevention			
Were Pollution Prevention (P2) opportunities discussed?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	
Comments:			
Did you use the flash drive to show them any P2 information?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	
If the flash drive was not used, did you show them to the P2 website?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> N/A
List Folder(s) or Explain:			
If the flash drive & website were not used, did you refer them to the P2 website? http://www.in.gov/dem/6506.htm	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
Are there any P2 ideas they plan to investigate/implement?	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	
If yes, please describe: <i>gasoline recycling, auto fluid processing</i>			
What P2 projects have been implemented in the past two years?			
Please List: <i>N/A</i>			

Can OPPTA contact the facility to get updates on the progress of their P2 projects? (If no projects, select N/A.)	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A
<input checked="" type="checkbox"/> Source referred to OPPTA/P2 Branch			

cc:



NOTICE OF INSPECTION
State Form 50890 (R3 / 11-05)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Telephone: (800) 451-6027 or (317) 232-8603

This is to notify you that on 6/22/10 an inspection of Surrett, Inc. was conducted by the undersigned representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality.

Type of Inspection (may include more than one):

- Commitment
-
-
- Complaint
- Multi-Media Screening Evaluation
- Other

Preliminary Inspection/Screening 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.

Single Media Inspection:

- 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)

Multi-Media Screening (Please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

- Multi-media screening not conducted.
- No violations were discovered with respect to the limited multi-media screening conducted by IDEM.
- Potential violations were discovered but corrected during the inspection.
- Potential violations were discovered and may be further investigated.

Pollution Prevention:

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that Indiana businesses increase productivity, generate less environmental wastes, reduce their regulatory responsibilities and become more profitable. Your participation in Indiana's pollution prevention program is entirely voluntary. If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance (OPPTA) at (317) 232-8172 or (800) 988-7901, or visit OPPTA's Web site at www.idem.IN.gov/oppta/p2t. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? Yes No

Compliance Assistance:

In addition to the compliance assistance offered by IDEM's individual programs, IDEM's Compliance and Technical Assistance Program (CTAP) offers free, confidential compliance assistance to regulated entities, including small businesses and municipalities, throughout Indiana. In the future, if you would like to request free, confidential compliance assistance, call (317) 232-8172 or (800) 988-7901, or visit CTAP's Web site at www.idem.IN.gov/ctap.

A summary of violations and concerns noted during the inspection was verbally communicated to the undersigned representative during the inspection. The facility should correct any violations noted as soon as possible. Violations identified and corrected during the inspection may still be cited as violations.

A written inspection summary will be provided within 45 days. In accordance with IC 13-14-5-4, matters not evident to IDEM at the time of the inspection might not be included in either the verbal or written inspection summary.

IDEM Representative:

Printed Name	Signature	Phone Number	Date	Time
Rick Passolet	<i>Rick Passolet</i>	219-257-0290	6/22/10	In: 1130 Out: 1315

Owner/Agent Representative:

Printed Name	Signature	Title	Phone Number	Date
BEVAN COULOUPOULOS	<i>Bevan Coulouopoulos</i>	Manager	219-902-0000	6/22/10



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

Northwest Regional Office
8380 Louisiana Street
Merrillville, Indiana 46410
(219) 757-0265
Toll Free (888) 209-8892
Fax (219) 757-0267
www.idem.IN.gov

July 15, 2010

VIA CERTIFIED MAIL: 7008 1140 0004 8185 8652

Mr. Peter Coulopoulos
Summit, Inc.
6901 West Chicago Avenue
Gary, IN 46406

Re: Inspection Summary / Violation Letter
Summit, Inc.
Plant ID Number: 089-00529
Gary, Lake County

Dear Mr. Coulopoulos:

On June 22, 2010, representatives of the Indiana Department of Environmental Management, Northwest Regional Office, conducted an inspection of Summit, Inc. located at 6901 West Chicago Avenue in Gary, Indiana. 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:
- Commitment
 - Surveillance
 - Complaint
 - Other
- Results of Inspection:
- No violations were observed
 - Violations were observed but corrected during the inspection.
 - Violations were observed.
 - Additional information/review is required to evaluate overall compliance.
 - Violations were observed and will result in an enforcement action.
 - Other

Mr. Peter Coulopoulos
Page 2

Prior to the inspection, no record of the submittal of the affidavit of construction could be located. This is a violation of permit condition B.3 (Affidavit of Construction). During the inspection, you mention stack testing had been completed in June of 2010. Yet prior to the inspection no record could be located of the submittal of a protocol thirty-five (35) days prior to the intended test date. This is a violation of permit condition C.8 (Performance Testing). You also were unable to produce records of the daily visible emissions notations. These are violations of permit conditions D.1.6 (Visible Emissions Notations) and D.1.9(a) (Record Keeping Requirements).

Within fifteen (15) days of receipt of this letter, a written detailed explanation, documenting compliance with each of the requirements listed above, must be submitted to this office. Failure to respond adequately to this Violation Letter may result in formal enforcement action. Please direct any response to this letter and any questions to Rick Massoels at 291-757-0290 or by email at rmassoel@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,



J. Robert Simmons
Deputy Director
Northwest Regional Office

JRS/rgm

cc: Lake County Health Department

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Peter Coulopoulos
 Summit, Ind
 6901 West Chicago Avenue
 Gary, IN 46406

2. Article Number

(Transfer from service label)

7008 1140 0004 8185 8652

COMPLETE THIS SECTION ON DELIVERY

A. Signature

x Peter Coulopoulos

 Agent Addressee

B. Received by (Printed Name)

Peter Coulopoulos

C. Date of Delivery

7/16/10

D. Is delivery address different from item 1?

 Yes

If YES, enter delivery address below:

 No

3. Service Type

 Certified Mail Express Mail Registered Return Receipt for Merchandise Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes



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Northwest Regional Office
8380 Louisiana Street
Merrillville, Indiana 46410
(219) 757-0265
Toll Free (888) 209-8892
Fax (219) 757-0267
www.idem.IN.gov

October 5, 2010

CERTIFIED MAIL: 7007 3020 0003 2618 9141

Mr. Peter Coulopoulos
Summit, Inc.
6901 West Chicago Avenue
Gary, IN 46406

Re: Failure to Reply Letter
Summit, Inc.
Plant ID Number: 089-00529
Gary, Lake County

Dear Mr. Coulopoulos:

In checking our records, we failed to find a reply to our Inspection Summary / Violation Letter dated July 15, 2010. We are enclosing another copy for your information.

Our agency must receive a written reply from you regarding this matter within ten (10) days from the date of this letter. Failure to adequately respond to this letter may lead to formal enforcement.

If you have any questions, please contact Mr. Rick Massoels at the above address or via telephone at (219)-757-0290.

Sincerely,

J. Robert Simmons
Deputy Director
Northwest Regional Office

JRS/rgm

Enclosure

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Mr. Peter Coulopoulos
Summit, Inc
6901 West Chicago Avenue
Gary, IN 46406

2. Article Number
 (Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Agent Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

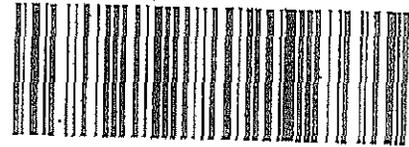
4. Restricted Delivery? (Extra Fee) Yes

7007 3020 0003 2618 9141

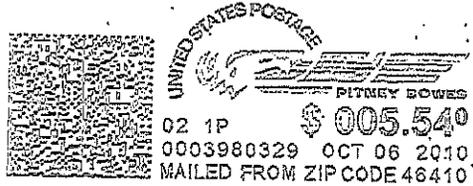
PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

CERTIFIED MAIL

STATE OF INDIANA
 DEPARTMENT OF ENVIRONMENTAL M
 8380 LOUISIANA ST
 MERRILLVILLE, IN 46410-6312



7007 3020 0003 2618 9141



RECEIVED

NOV 01 2010

Indiana Department of Environmental
 Management - Northwest Regional Office

Mr. Peter Coulopoulos
 Summit, Inc.
 6901 West Chicago Avenue
 Gary, IN 46406

RETURN TO SENDER
 UNCLAIMED
 UNABLE TO FORWARD

BC: 46410631280 *2412-13043-06-37



OX 001411

RECEIPT OF DELIVERY

This is to acknowledge that Rick Massoels delivered a Failure to Reply Letter dated October 5, 2010 to the undersigned on November 15, 2010 at Summit, Inc.

Bennett Coulopoulos
Printed Name

Bett Coulopoulos
Signature

I have Receipt of Letter 11/15/10 RGM

Summit, Inc.
6901 West Chicago Avenue
Gary, IN 46406

RECEIVED

November 23, 2010
CERTIFIED MAIL

NOV 24 2010

Mr. Rick Massoels
IDEM Northwest Regional Office
8380 Louisiana Street
Merrillville, IN 46410

Indiana Department of Environmental
Management - Northwest Regional Office

Subject: **IDEM Receipt of Delivery on 11-15-2010 that included:**

- **IDEM Inspection Summary/Violation Letter dated 7-15-2010**
- **IDEM Failure to Reply Letter dated 10-5-2010**

Summit, Inc.
Plant ID Number: 089-00529
Gary, Lake County

This submittal was prepared in response to the documents you personally delivered on November 15, 2010. In this delivery, the July 15, 2010 IDEM Inspection Summary noted the following:

- No record of submittal of the Affidavit of Construction (MSOP Condition B.3)
- No record of submittal for a test protocol 35 days prior to intended test date (MSOP Condition C.8)
- Inability to produce records of the daily visible emissions notations (MSOP Conditions D.1.6 and D.1.9(a))

Please note that on July 12, 2010, Summit, Inc. submitted the Minor Source Operating Permit (MSOP) Certification, Annual Notification, and Affidavit of Construction. These documents were submitted via U.S. Mail, Certified Return Receipt Request (CRRR) and receipt was acknowledged by IDEM.

The Stack Test Protocol Form was identified on the Annual Notification as not having been completed for the June 15, 2010 performance testing.

A Stack Test Protocol Form was submitted on November 10, 2010 for the Z-box Cleaning System (EU001). Because there is no stack on the vehicle/metal shredder (EU002), no testing is proposed at this location. The proposed test date is December 12, 2010. Fourteen (14) days before the actual test date another notice will be sent to notify IDEM.

Because there is no stack on the vehicle/metal shredder (EU002), a MSOP modification request was submitted to IDEM on August 30, 2010. On September 30, 2010, IDEM issued a Notice of Deficiency (NOD) for the modification request. The NOD indicated that there was insufficient evidence that emissions from the shredder (EU002) are considered fugitive and cannot be tested.

The testing requirements for the vehicle/metal shredder (EU002) still need to be determined by IDEM because there is no stack point source. It is not feasible to collect these emissions through a stack because none exists.

Daily visible emission notations are currently being performed on a daily basis by Summit, Inc. These records are maintained and are available upon request.

If you have additional questions or need more information, please contact me at (219) 944-9749.

Sincerely,



Peter Coulopoulos,
General Manager

cc: Alison L. Benjamin, Attorney at Law
Thiros & Stracci, P.C.
200 East 90th Drive
Merrillville, IN 46410-8102.

CX 52



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

August 20, 2014

VIA Email

Peter Coulopoulos
Summit, Inc.
6901 W. Chicago Ave.
Gary, IN 46406

Dear Mr. Coulopoulos:

Re: Summary Letter
Summit, Inc.
EPA Non-notifier
Gary, Lake County

On July 9, 2014, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Summit, Inc., located at 6901 W. Chicago Ave., Gary, Ind. 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: X Complaint Inspection

Results of Inspection: X ***Violations were observed and will be referred to the Office of Land Quality, Land Enforcement Section. See inspection report.***

Please direct any questions to me at (574) 245-4873 or by e-mail at rcarpent@idem.in.gov. Thank you for your attention to this matter.

Sincerely,

Rebekah Carpenter
Environmental Manager
Industrial Waste Section
Compliance and Response Branch
Office of Land Quality

Enclosure
cc: Lake County Health Department



**AUTO SALVAGE
INSPECTION
REPORT**
INDIANA DEPARTMENT OF
ENVIRONMENTAL
MANAGEMENT

Inspector's Name:	Rebekah Carpenter
Others In Attendance:	Peter Coulopoulos (facility); Joanne Laramie (EPT Consultants); Pete Julovich (city of Gary)
Time In:	9:30 AM
Time Out:	12:27 PM
Date of Inspection:	7/9/2014
Purpose of Inspection:	<input checked="" type="checkbox"/> CEI <input checked="" type="checkbox"/> COI <input type="checkbox"/> EFI <input type="checkbox"/> BL <input type="checkbox"/> SF <input type="checkbox"/> PC <input type="checkbox"/> Other

General Information

Facility Contact Information

1. Facility Name:
Summit, Inc.

2. Location:
Street Address: 6901 W. Chicago Ave.
S City/State: Gary, IN
S Zip Code: 46406
S County: Lake
Mailing Address: 6901 W. Chicago Ave.
M City/State Gary, IN
M Zip Code: 46406
M County: Lake

3. Contact Information:
Facility Contact Person: Peter Coulopoulos
F Phone Number: (219) 944-9080
F Fax Number:
Facility Contact Email: pcoulopoulos@comcast.net
Property Owner: Peter Coulopoulos
Facility Owner: Peter Coulopoulos
Owner's Phone Number: (219) 902-6928
Owner's Fax Number:
Owner's Email: pcoulopoulos@comcast.net

Facility Type

1. Auto Salvage Facility:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NR
2. Scrap Metal Processor:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NR
3. Towing Service:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NR
4. Other Facility Type:	

Crusher and Scrap Metal Info

1. Are vehicles and/or other equipment crushed/shredded on-site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NR
2. Does the facility own the crusher/shredder?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NR
3. Name and address of company operating the crusher (if brought on-site):	
4. Name and address of scrap metal processors where vehicles, equipment and other parts are sent for recycling (if sent off-site):	

Facility Information

1. Approximate number of vehicles processed per day/month/year?	Varies <input checked="" type="checkbox"/> per day <input type="checkbox"/> per month <input type="checkbox"/> per year
---	--

2. Approximate number of vehicles currently on-site?	Not determined.
3. Approximate acreage of facility?	Approx. 36.5 acres
4. Number of years the property has been utilized as an auto salvage facility?	Facility has been used for various activities since the 1960s.
5. SIC Code(s):	<input type="checkbox"/> 5015 (Motor Vehicle Parts, Used) <input checked="" type="checkbox"/> 5093 (Scrap and Waste Materials) <input type="checkbox"/> 7549 (Automotive Services, Except Repair and Carwashes) Other
6. NAICS:	<input type="checkbox"/> 423140 (Motor Vehicle Parts (Used) Merchant Wholesalers) <input checked="" type="checkbox"/> 423930 (Recyclable Material Merchant Wholesalers) <input type="checkbox"/> 488410 (Motor Vehicle Towing) Other:

Waste Streams			
From Vehicles	Removed?	Quantity on-site	Disposition
1. Used Oils (differential fluid, motor oil, transmission fluid, and brake fluid):	<input checked="" type="checkbox"/>		Future Environmental
2. Fuel (Gas and Diesel):	<input checked="" type="checkbox"/>		Future Environmental
3. Fuel Filters:	<input type="checkbox"/>		
4. Lead Parts:	<input type="checkbox"/>		
5. Mercury (lights, hoods, and switches):	<input checked="" type="checkbox"/>		ELVS
6. Used Oil Filters:	<input type="checkbox"/>		
7. Antifreeze:	<input checked="" type="checkbox"/>		
8. Batteries (Lead-Acid):	<input checked="" type="checkbox"/>		
9. Airbags (Sodium Azide):	<input type="checkbox"/>		
10. Windshield Washer Fluid:	<input type="checkbox"/>		
11. Brake Shoes and Clutches (Asbestos):	<input type="checkbox"/>		
12. Engines:	<input type="checkbox"/>		
13. Waste Tires:	<input checked="" type="checkbox"/>		various

Non-vehicle Waste Streams		
Non-vehicle Waste Streams	Quantity on-site	Disposition
1. PCB Capacitors:	N/A	
2. Solvents:	N/A	
3. Contaminated Soil:	N/A	
4. Paint:	N/A	
5. Absorbent Materials:	N/A	
6. Shop Towels:	N/A	
7. Solid Waste (contained):	N/A	
8. Solid Waste (open dump -not contained):	See report	
9. White Goods:	N/A	
10. Others (specify):		

Checklist

Secretary of State

1. Does the facility have a valid Salvage Motor Vehicle Business License? Yes No NI NA NR

Fluids Management

1. Is there evidence of spills or releases of fluids including gasoline, fuel, motor oil, antifreeze, transmission fluid, brake fluid, battery acid, power steering fluid, crank case oil, solvents and paint? Yes No NI NA NR

1a. Were the spills and releases reported to IDEM upon discovery? Yes No NR

B1. Are fluids and filters removed from vehicles prior to storing them in the yard? Yes No NI NA NR

B2. Are fluids from vehicles removed over a cement pad, inside a building, using funnels, pumps, and/or drip pans? Yes No NI NA NR

B3. Are vehicle batteries removed prior to storing vehicles in the yard? Yes No NI NA NR

B4. Are vehicle batteries stored in a building or away from the elements, such as rain or snow, to prevent a release to the environment? Yes No NI NA NR

B5. Is the crusher located in an impervious secondary containment unit or inside a building? Yes No NI NA NR

B6. Is windshield wiper fluid removed and recycled? Yes No NI NA NR

B7. Are containers storing fluids inspected weekly for rust, dents, holes, bulges, and leaks? Yes No NI NA NR

B8. Do all containers of fluids, not just those subject to the used oil or hazardous waste rules, have secure (sealed tight) lids? Yes No NI NA NR

B9. Are all containers of fluids, not just those subject to the used oil or hazardous waste regulations, labeled to identify their contents? Yes No NI NA NR

B10. Are containers stored in a building or away from the elements such as rain and snow to prevent the deterioration of the containers and a release to the environment? Yes No NI NA NR

B11. Are empty drums stored in a manner to prevent the accumulation of rain water? Yes No NI NA NR

B12. Are engines, transmissions, and other vehicle parts stored in a building or away from the elements, such as rain and snow, to prevent releases to the environment? Yes No NI NA NR

B13. Are floor drains closed or filled in where fluids are present? Yes No NI NA NR

Oil

1. Are containers and/or tanks storing used oil in good condition (free from rust, dents, holes, bulges, and leaks)? Yes No NI NA NR

2. Are tanks and containers that are used to store used oil clearly labeled with the words "Used Oil"? Yes No NI NA NR

3. Does the facility burn used oil in a space heater? Yes No NI NA NR

3a. Is the used oil that the facility burns generated only at that facility location or by a household do-it-yourselfer? Yes No NR

4. Is a registered transporter used for shipments of used oil? Yes No NI NA NR

4a. Is 55 gallons or less of used oil transported in your own vehicles (company or employee) to either a government approved collection center or an aggregation point (owned or operated by your company)? OR Is used oil being transported and reclaimed under a contract that requires your used oil to be returned to you for re-use? Yes No NR

5. Is the total storage capacity of on-site oil greater than 1320 gallons? Note that: -This storage capacity adds ONLY containers and/or tanks with a capacity of 55 gallons or more (i.e. small containers such as 5 gallon buckets are not added) -The total may include more than one storage location (which may need to be entered into additional information table). -"Oil" includes product oil as well as waste oil.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
5a. Does the facility have an SPCC Plan (Spill Prevention, Control, and Countermeasure Plan)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NR		
Underground Storage Tanks					
1. Are there any underground storage tanks (USTs) located on-site?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
1a. Are there petroleum or hazardous substance containing USTs (greater than 100 gal) on-site that have not been registered with IDEM? (Underground tanks storing fuel for heating are exempt.)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NR		
Hazardous Waste Management					
1. Do you have any unknown material located on-site?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
2. Do you generate hazardous waste in quantities greater than or equal to 220 lbs/month?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
Waste Tire Management					
1. IC 13-11-2-250 "Waste tire", for purposes of IC 13-20-13 and IC 13-20-14, means a tire that is not suitable for the tire's original purpose. Does the facility have over 1,000 waste tires stored outside or over 2,000 waste tires stored inside?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
1a. Does the facility have a valid certificate of registration as a waste tire storage facility?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No			
See attached Waste Tire Inspection Report	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> NA			
2. Is there evidence of open dumping of waste tires on site?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
3. Are waste tires stored in a manner that poses a fire hazard (including: near a heat source, welding, torching, smoking, or under electrical power-lines)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
4. Is water prevented from accumulating in waste tires?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
5. Do the waste tires harbor vectors (mosquitoes, rodents, fleas, ticks) that pose a threat to human health?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
6. Does this facility ship whole waste tires off-site?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
6a. Are they delivered to one or more of the following approved locations? -a wholesaler or agent of a wholesaler -a manufacturer of tires -a facility that recycles or collects tires for delivery to a facility that recycles -a permitted final disposal facility regulated under environmental management laws -a permitted waste tire storage site -a facility operated as a waste tire cutting facility under a permit issued by the commissioner -a registered waste tire transporter or a person who operates a municipal waste collection and transportation vehicle licensed under IC 13-20-4.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NR		
Mercury Switches					
1. Does your facility receive vehicles that contain mercury switches?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
2. Does the facility remove mercury containing switches from vehicles?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR

3. Are all mercury switches and/or mercury containing ABS switches stored in a container that complies with the universal waste regulations for transportation (i.e., End of Life Vehicle Solutions [ELVS] or other Dept. of Transportation [DOT] approved) container?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
4. Are containers in good condition and kept closed unless adding or removing mercury containing devices?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
5. Are the containers marked as universal waste?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
6. Have any containers of mercury switches been accumulating on-site for more than 1 year (containers should be labeled with accumulation start date)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
7. Are records of mercury switch removals maintained at the facility documenting the number of cars processed at the facility, the number of vehicles that contained switches, and the total number of switches collected? (See Compliance Manual for further requirements)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
8. Does the facility have appropriate safety procedures and emergency equipment where handling mercury devices (i.e., well ventilated area, containment devices, mercury spill kit)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
9. Have employees been trained on appropriate safety and emergency procedures for removing and handling mercury switches including removing over a containment device, having a mercury spill kit on hand, and removing in a well ventilated area?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
Solid Waste Management					
1. Is there evidence of open dumping of garbage, refuse, construction debris, commercial waste, industrial waste, ash piles, contaminated soils, household waste, or other similar items?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B1. Does the facility remove brake or clutch pads from vehicles?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B1a. Are measures taken to eliminate asbestos exposure?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B2. Does this facility remove air bags?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B2a. Are measures taken to safely remove un-deployed airbags?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
Air					
1. Is there any evidence of open burning (Note: No burning is permitted except in an approved device)?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
2. Are solvents (cleaners/degreasers) used at this facility?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
2a. Are degreaser (parts washer) covers closed when not cleaning parts?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
2b. Are waste solvent containers stored closed?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA		
3. Is there any activity generating dust or spray that crosses property lines?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
4. Is there a sweat furnace (i.e., a furnace used to reclaim aluminum from scrap metal) in use at the facility?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
5. Are there records documenting appropriate removal of refrigerants from vehicles, white goods, or other equipment? (Referred to Compliance Manual Tab 6, Pg. 4)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
6. Are refrigerants collected in EPA approved devices? (Referred to Compliance Manual Tab 2, Pg. 2)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
7. Are refrigerants (i.e., Freon, CFCs, etc.) being discharged to the atmosphere?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B1. Are refrigerants removed from vehicles prior to storing them in the yard?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR

B2. Are employees trained to remove and capture refrigerants?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B3. Are all AC openings sealed after evacuation to prevent leaking of residual refrigerant?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
B4. Are collection/storage devices inspected to ensure they are not overfilled?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
Water					
1. Are there any existing or planned land disturbing activities that exceed one acre at the facility?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
2. Does the facility have a permit for land disturbing activities as referenced under 327 IAC 15-5?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
3. Is there extensive soil buildup on roads around the facility?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
4. Does the facility have any construction or filling activities in a potential floodway?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
5. Is the facility (or any part) located within a potential designated wetland area?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
6. Is the facility's drinking water supplied by a municipal system (private or public)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
6a. Does the facility have a PWS ID Number?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
7. Has the facility submitted a Notice of Intent (NOI) for Storm Water Rule 6?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
7a. Does the NOI accurately reflect the storm water conditions (i.e. location of outfalls and drainage areas) at the facility?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
8. Has the facility submitted a Storm Water Pollution Prevention Plan (SWP3) Certification Checklist signed by a qualified professional (i.e., trained and experienced in storm water treatment techniques) to the Department? (See Compliance Manual for further details)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
9. Has the facility developed a Storm Water Pollution Prevention Plan (SWP3)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
10. Has the facility implemented good housekeeping measures described within the SWP3 at the site to ensure that contaminants from auto salvage activities aren't exposed to storm water?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
11. Does the facility document quarterly inspections of storm water run-off conveyances looking for oil sheens, discoloration, dead aquatic life, and sediment buildup in nearby ditches and/or streams?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
12. Has the facility documented annual employee training on the components and goals of the SWP3? (i.e. spill response, good housekeeping, and materials management)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
13. Has the facility submitted storm water sample results of the required twelve (12) parameters?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
13a. Do sample results indicate any contamination of the twelve (12) parameters?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
13b. Did the facility identify the source of the contaminate(s) and eliminate them?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input checked="" type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
Miscellaneous					
1. Were any potential workplace safety issues observed pertaining to IOSHA (e.g., loading and moving vehicles in an unsafe manner, stacking cars, waste, or parts too high, or not wearing respiratory, eye or other protection when needed)?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR
2. Does the facility have permanent or handheld radiation equipment on-site?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NI	<input type="checkbox"/> NA	<input type="checkbox"/> NR

Summary

Summit, Inc. is located at 6901 W. Chicago Ave. in Gary, just northwest of the Gary Airport. The facility is a scrap metal processor that operates a large hammer mill shredder. IDEM's Industrial Waste Compliance staff received a complaint about the facility's stockpile of shredder fluff from the shredding process.

SITE HISTORY

Summit (previously known as Western Scrap) started as an auto salvage yard in the 1960s and is now a scrap metal processor, utilizing a hammer mill shredder and classifying separator to separate metals from other materials. Previously, the facility was inspected by IDEM Industrial Waste Compliance staff in May 2010 in response to a complaint about shredder fluff and possible PCB contamination. That inspection found the following violations: improper fluids management (spills were noted); SPCC plan not updated; improper storage of waste tires; improper mercury switch containers and no proof of employee training on mercury; issues with storm water permit requirements; and not removing PCB-containing capacitors before sending items to the shredder as well as possible improper disposal of the resulting shredder fluff.

Industrial Waste Compliance staff conducted a follow-up inspection in October 2011. That inspection notes that most of the violations had been resolved. The storm water issues were referred to the Wetlands and Storm Water section of IDEM for further follow-up. (Please see included documentation of the resolution of that issue.) Also, new guidance on PCBs was provided in that report.

In November 2011, a shredder fluff pile caught fire. According to news reports, the fire caused the airport to divert some flights, and some nearby businesses had to evacuate. IDEM Emergency Response staff assisted in response operations to the fire and eventually referred the site to State Cleanup for follow-up. (For pictures of the fire, see <http://posttrib.suntimes.com/photos/galleries/?story=8942687>.)

Previous to these incidents, an enforcement action was taken against the facility (as Western Scrap) in 2002 regarding spill notification and open dumping. The violations were noted as resolved in February 2009, and the enforcement case was closed in February 2011 (Case Nos. 2002-12265-S and 2002-12267-S).

INSPECTION DETAILS

IDEM staff inspected the facility on July 9, 2014. Present from IDEM was Rebekah Carpenter. Pete Julovich, from the city of Gary's Environmental Affairs division, was present during the inspection. Peter Coulopoulos, the facility owner, assisted staff during the inspection, and Joanne Laramie, from Environmental Process Technologies, Inc., also was present.

Please see the included drawing of the facility and photos of the property. (Please note that a large portion of the property contains piles of shredder fluff, which made accessing the entire property difficult. The map is as reflective of the conditions on-site during the inspection as possible.) During the inspection, staff toured the property with Mr. Coulopoulos and Ms. Laramie. The facility sits on several acres to the northwest of Gary Airport. There are several buildings on-site, as well as the hammer mill shredder/classifier apparatus. The southern half of the property is covered with large piles of shredder fluff.

Per Mr. Coulopoulos, the facility is strictly a scrap metal processor, and there is no crusher on-site for vehicles. When vehicles arrive on-site, fluids are drained if still necessary, and mercury switches and batteries are pulled. Waste tires either go into the shredder or are sold when a buyer is available. The facility has a "scrap denial list" (see included documentation) that informs customers what the facility will not take, and all loads are inspected against that list before going into the shredder. Mr. Coulopoulos stated that, when found, PCB-containing capacitors are removed, and that loads of waste shredder fluff that are sent to the landfill are tested for PCBs beforehand (see included documentation).

The piles of shredder fluff, according to Mr. Coulopoulos, still contain metals that can be retrieved. He noted that removal of stainless steel is not currently optimal, and he has parts on order that will make the process more effective. Mr. Coulopoulos also is working on contracts for a buyer to take the shredder fluff to remove and reuse the plastic it contains. During the inspection, Mr. Coulopoulos indicated that he thought there were 30,000 to 40,000 tons of fluff on-site.

No issues with the facility, other than those noted in the Conclusions section below, were noted during the inspection.

CONCLUSIONS

The following issues were noted with regard to the shredder fluff piles at the Summit facility:

- PCBs – In addition to testing loads of shredder fluff, the facility should include a standard letter to the landfill with each load indicating that PCBs may be present in the waste {See "Description of Violations and Further Actions" for specific requirements}.
- Storage – Storage of waste for more than 6 months constitutes disposal. The shredder fluff piles have been noted

on-site since at least 2011. While they may contain recoverable metal scrap materials, the facility cannot speculatively accumulate the shredder fluff.

- Fire Hazard – The facility had a shredder fluff fire in 2011. IDEM staff spoke with the Gary Fire Department, which indicated that while the site has been inspected, the size of the shredder fluff piles was not addressed. The size and locations of the piles (possibly too close to structures and/or each other) is a concern, and the facility is being referred to the State Department of Homeland Security, Division of Fire and Building Safety, for an evaluation.

Please see the Description of Violations section for more information. Please note that the facility has been referred to the IDEM Office of Land Quality Enforcement Section.

Description of Violations and Further Actions

Solid Waste Management

1. IC 13-30-2-1(3), (4), (5): A person may not allow the deposit of any contaminants upon the land or into the environment.

329 IAC 10-2-181: "Storage" means the retention, containment, or accumulation of solid waste on a temporary basis in such a manner that it does not threaten or potentially threaten human health or impact or potentially impact the environment, for a period of more than twenty-four (24) hours, in such a manner as not to constitute disposal of the waste. It must be a rebuttable presumption that storage of waste for more than six (6) months constitutes disposal.

329 IAC 10-4-2: Acts prohibited Sec. 2. No person shall cause or allow the storage, containment, processing, or disposal of solid waste in a manner which creates a threat to human health or the environment, including the creating of a fire hazard, vector attraction, air or water pollution, or other contamination.

329 IAC 10-4-3, 329 IAC 10-4-4 (a) (1), (2): Open dumps are prohibited and must be remediated.

Note: The facility has several very large piles of shredder fluff on-site.

Referral: Referred to the Office of Land Quality Enforcement Section.

PCBs

329 IAC 4.1-4-1, incorporating language found at 40 CFR 761.61(b) including:

1). 40 CFR 761.62(b)(2). Any person may dispose of PCB bulk product waste other than those materials meeting the conditions of paragraph (b)(1) of this section in a facility that is permitted, licensed, or registered by the State to manage municipal solid waste subject to 40 CFR 258 if:

a). the PCB bulk product waste is segregated from organic liquids disposed in the landfill unit (*including landfill leachate recirculation*).

b). leachate is collected from the landfill unit and monitored for PCBs

c). any release of PCBs (including but not limited to leachate) from the landfill unit shall be cleaned up in accordance with 40 CFR 761.

2). 40 CFR 761.62(b)(4)(ii): Any person disposing off-site of PCB bulk product waste regulated by 40 CFR 761.62(b)(2) at a waste management facility not having a commercial PCB storage or disposal approval must provide written notice to the facility a minimum of 15 days in advance for the first shipment from the same disposal waste stream and with each shipment thereafter. The notice shall state that the PCB bulk product waste may include components containing PCBs at ≥ 50 ppm based on analysis of the waste in the shipment or application of a general knowledge of the waste stream which is known to contain PCBs at those levels, and that the PCB bulk product waste is known or presumed to leach ≥ 10 ug/l PCBs.

3). 40 CFR 761.62(b)(5): Any person disposing of PCB bulk product waste must maintain a written record of all sampling and analysis of PCBs or notifications made under 40 CFR 761.62(b)(4)(ii) for three (3) years from the date of the waste generation. The records must be made available to IDEM upon request.

Note: PCB-containing materials must be managed and disposed of in accordance with state (329 IAC 4.1) and federal (40 CFR 761) regulations. The facility currently disposes of shredder fluff at a municipal solid waste landfill (Republic) and tests for

PCBs before sending the loads.

Required Action: The facility shall immediately begin complying with all requirements listed above. . If you have further questions about this, please contact Mr. George Ritchotte at (317) 727-6907.

Referral: Referred to the Office of Land Quality Enforcement Section.

Indiana Fire Code

The size of the shredder fluff piles, as well as the distance between piles and/or between piles and structures, may be in violation of the Indiana Fire Code.

Referral: Referred to the Indiana State Department of Homeland Security, Division of Fire and Building Safety.

Photo Log



Photo 1

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Tires staged in front of the trailer used for tire transport.

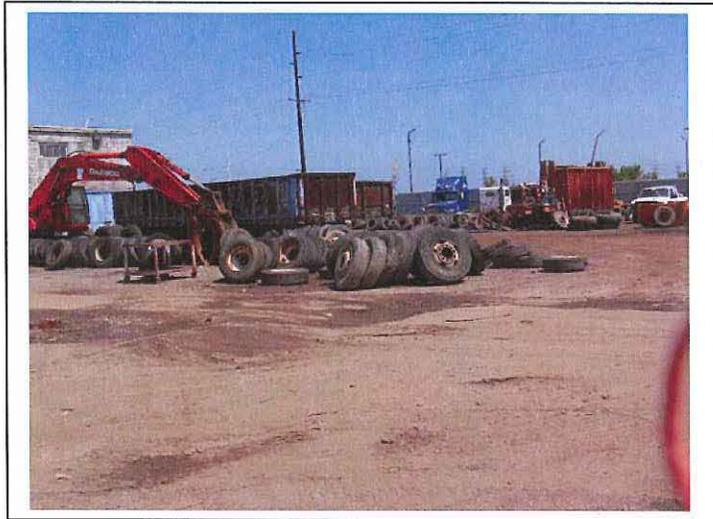


Photo 2

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Tires on rims stacked near the northeast side of the property.

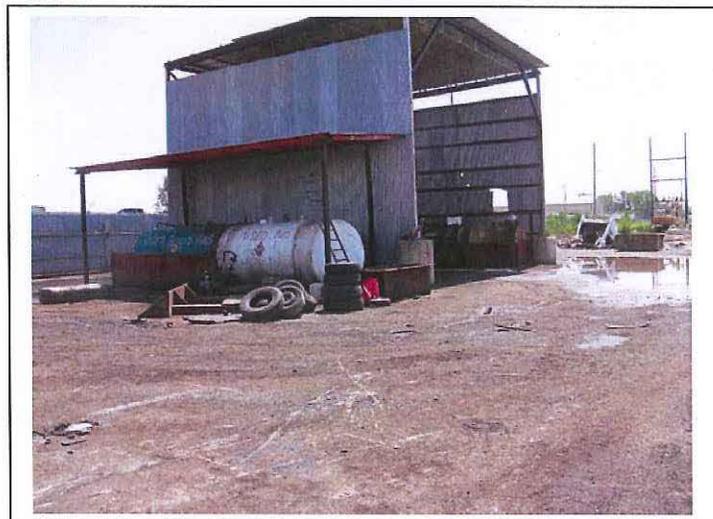


Photo 3

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Storage area for used oil and gas.

Photo Log



Photo 4

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Fluff Pile A (see map) on the north/northeast side of the shredder.

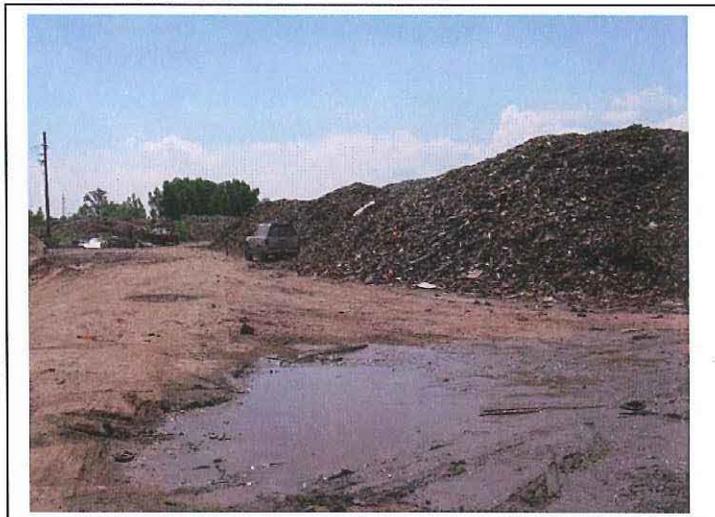


Photo 5

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking southeast along the north/northeast edge of Pile A.

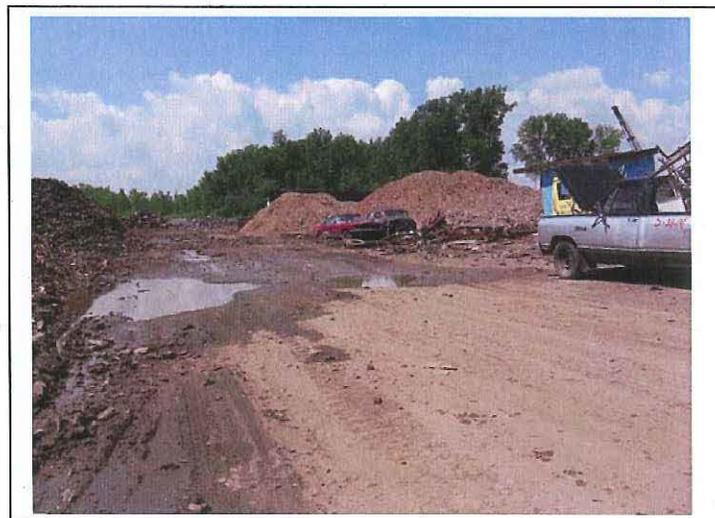


Photo 6

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Wood chip/mulch pile to the west of Pile A.

Photo Log



Photo 7

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking east/southeast, with Pile A at right and the northern part of Pile B at left.



Photo 8

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

The easternmost edge of Pile A, looking toward the shredder.

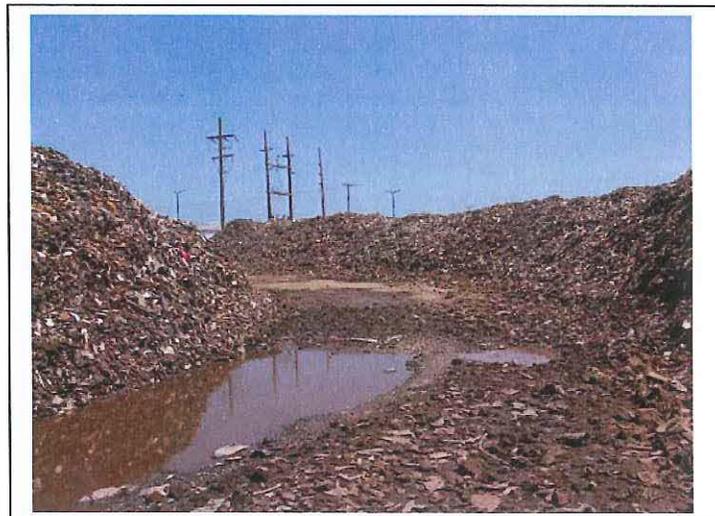


Photo 9

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking east/northeast at Pile B (right) and the easternmost edge of Pile A (left).

Photo Log

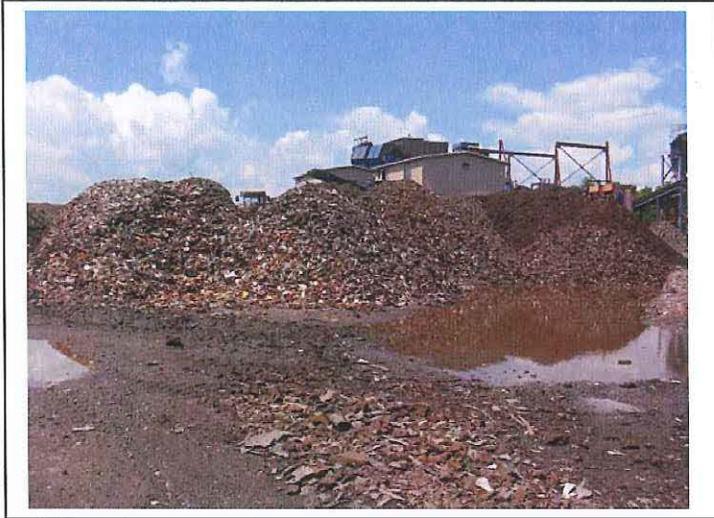


Photo 10



Photo 11



Photo 12

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking west at Pile C.

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking west with Pile C at right and Pile B at left.

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking north/northwest at the inside curve of Pile A.

Photo Log



Photo 13

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

The shredder/classifier area.

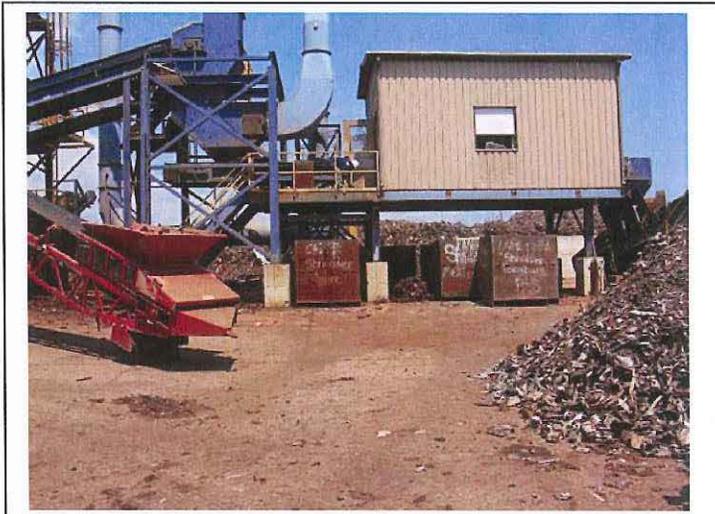


Photo 14

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

The shredder/classifier area.



Photo 15

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking south/southeast at Pile B.

Photo Log



Photo 16

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Continuing to look south/southeast at Pile B.



Photo 17

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Continuing to look south/southeast at Pile B.

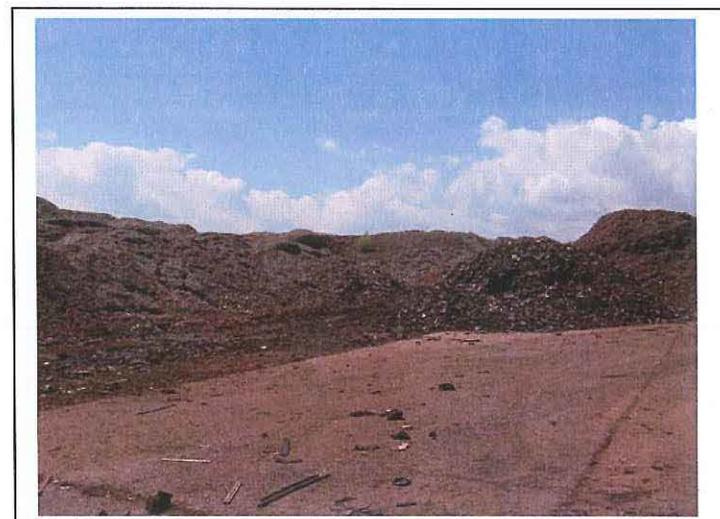


Photo 18

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking south/southwest at Pile B (left), with Pile D at right.

Photo Log

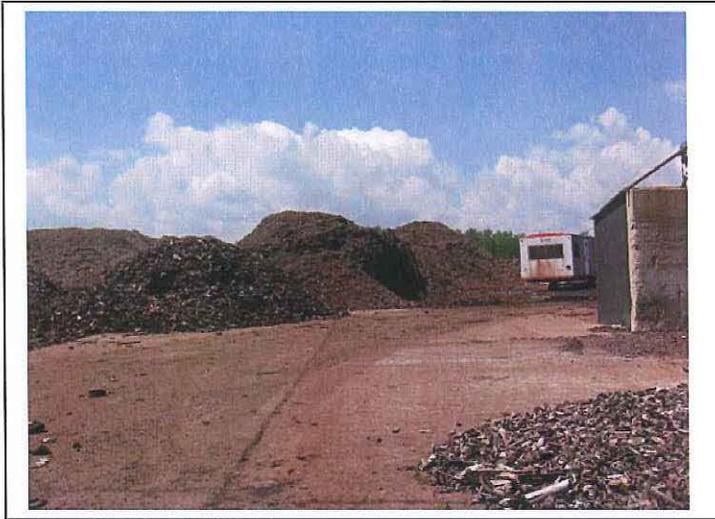


Photo 19

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking west at Pile D.

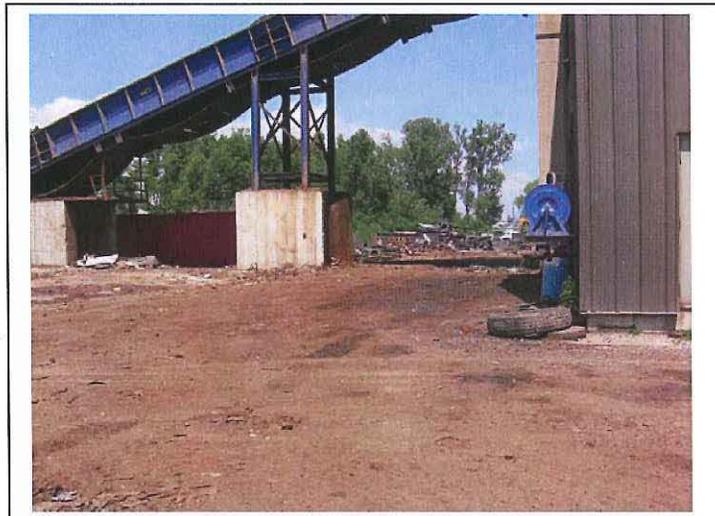


Photo 20

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

The ramp where materials are first fed into the shredder.

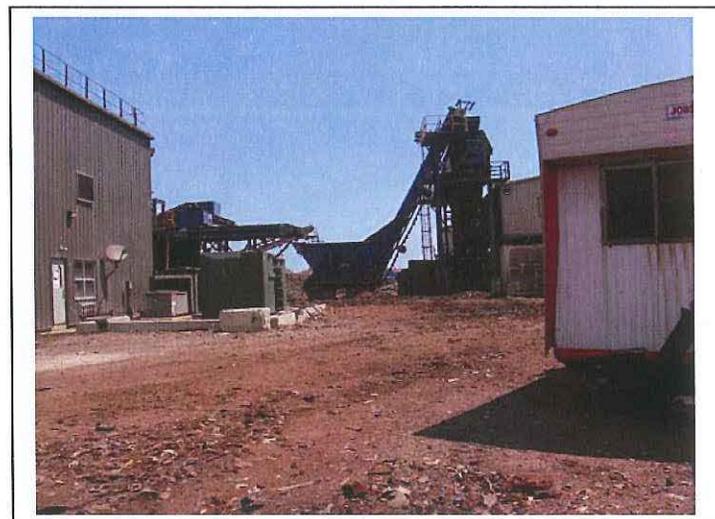


Photo 21

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking east toward shredder/classifier area.

Photo Log



Photo 22

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking west toward Pile E in distance.



Photo 23

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Pile B, just south of Pile D.



Photo 24

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking east, with Pile D at left and Pile B at right.

Photo Log



Photo 25

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Pole near the southwest end of Pile B.



Photo 26

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking west at the southern end of Pile E.

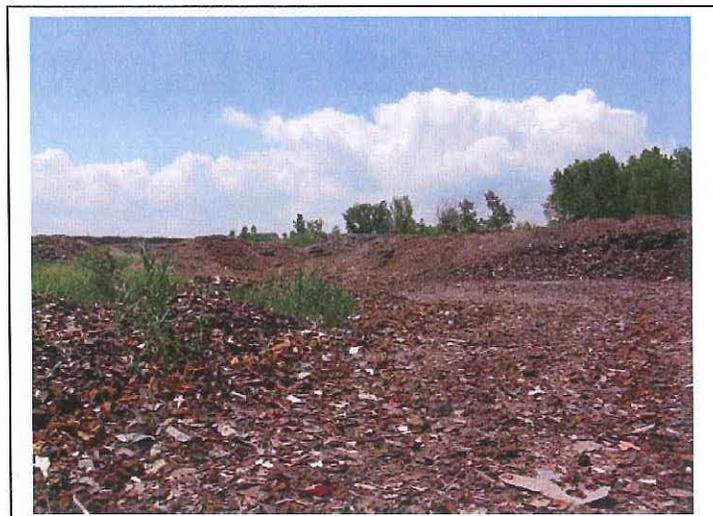


Photo 27

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking west at the southern end of Pile E.

Photo Log



Photo 28

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Walking up the southern end of Pile E, looking south/southwest toward Pile F.

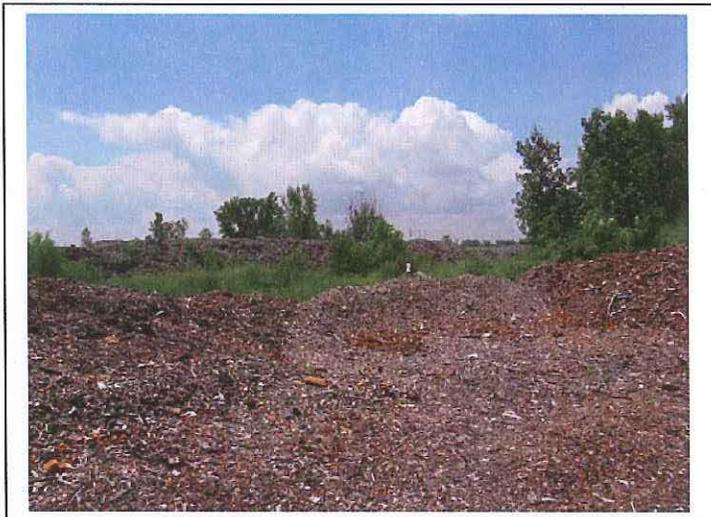


Photo 29

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Walking up the southern end of Pile E, looking south/southwest toward Pile F.

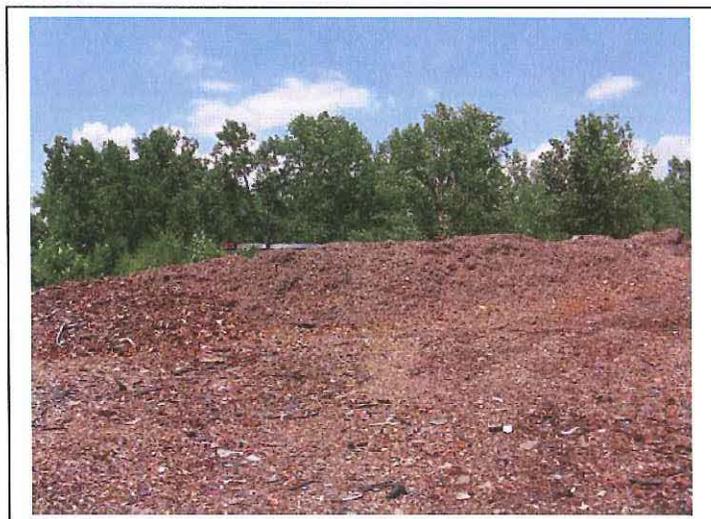


Photo 30

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking west along Pile E.

Photo Log

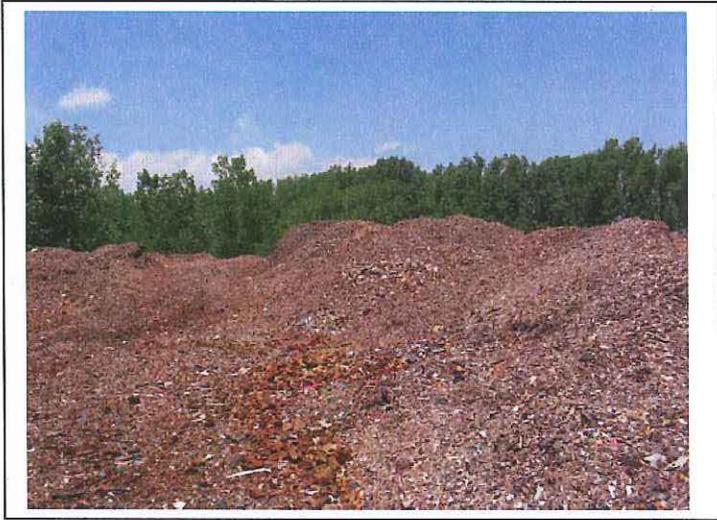


Photo 31

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking west/northwest along Pile E.



Photo 32

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking north along Pile E.



Photo 33

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

From Pile E, looking northeast toward shredder/classifier area.

Photo Log

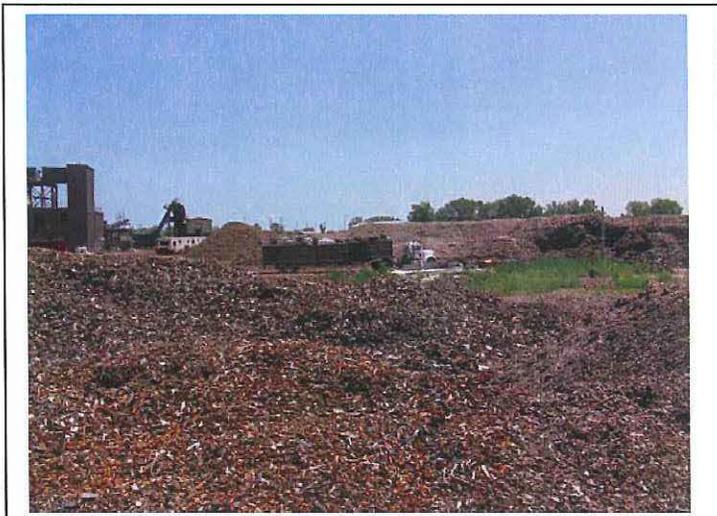


Photo 34

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking east from Pile E at Piles D and B (pole from photo 25 can be seen at right).



Photo 35

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

On Pile E, looking east toward Pile B and the pole.



Photo 36

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

On Pile E, looking southeast toward the end of Pile B.

Photo Log



Photo 37

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking southwest toward Pile F.



Photo 38

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

A close-up of material in one of the piles.



Photo 39

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Tires on rims staged on the northwest side of the shredder/classifier area.

Photo Log



Photo 40

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

Looking northeast toward Pile A, with the shredder/classifier area to the right.



Photo 41

Facility Name

Summit, Inc.

Photographer

Rebekah Carpenter

Date

7/9/14

Others Present

Peter Coulopoulos (facility); Joanne Laramie (EPT); Pete Julovich (city of Gary)

Description

A container of stainless steel that has been separated from the fluff.

SUMMIT INC. 6901 W. CHICAGO AVE GARY IN

46406

REQUIREMENTS TO SCRAP A VEHICLE

*TITLE

*APPLICATION FOR TITLE

*AFFIDAVIT FROM GOVERNMENT AGENCY

*REGISTRATION WITH SIGNED BILL OF SALE

->COPY OF OWNER'S STATE ISSUED ID AND PHONE NUMBER

SCRAP DENIAL LIST

NO

-MICROWAVES

-FIRE EXTINGUISHERS

-PLASTIC

-MONITORS/ELECTRONICS

-PAINT CANS

-CHEMICALS

-OIL FILTERS

-PRESSURIZED CANS

-CONCRETE/ROCK

-PCB CAPACITORS

-PROPANE

-LIQUID WASTE

-T.V.S

-STOLEN MATERIAL

-THERMOSTATS

-MERCURY SWITCHES

-DIRT

-RADIO ACTIVE

-FIRE ARMS

-AIR CONDITIONERS

NOTE: ALL LOADS AND CARS BROUGHT INTO SUMMIT INC ARE INSPECTED

Joyce Casillas

From: Braun, Randy
Sent: Sunday, July 01, 2012 2:49 PM
To: 'Joyce Casillas'
Subject: RE: Summit, Inc. Response to
Categories: Summit Inc.

Joyce, I do not believe I notified you, but Doug wolf of my staff had visited this site with respect to Rule 6 Industrial Storm Water Permitting. At this point the facility does not have a point source, however is this situation should change they will be required to obtain Rule 6 permit coverage.

Randy J. Braun, CPESC, CMS4S
IDEM, Office of Water Quality
100 North Senate Avenue
MC 65-42, IGCN Room 1255
Indianapolis, Indiana 46204

Phone: 317-234-3980
Toll Free: 800-451-6027
FAX: 317-234-4145
rbraun@idem.in.gov

Storm Water Program: <http://www.IN.gov/idem/4896.htm>
Indiana Storm Water Quality Manual: <http://www.IN.gov/idem/4899.htm>
Section 401 Water Quality Certification Program: <http://www.IN.gov/idem/4870.htm>

From: Braun, Randy
Sent: Sunday, January 08, 2012 2:34 PM
To: Joyce Casillas
Cc: Coulopoulos@hotmail.com; Mark Thiros; Patrick Gorman; Wolf, Douglas R
Subject: RE: Summit, Inc. Response to

Joyce,

Thanks for contacting me. I did still show the file to be in the deficiency area. After receiving your e-mail and also locating the file, I do have the original letter that was sent. Megan Nagle was with the program when it was sent in and she had it targeted for an inspection to verify the claim that run-off does not discharge. She left the program last spring, but I believe one of my other staff, Doug Wolf, had visited the site for Rule 5. I am going to touch base with him and discuss the site. Once we determine how we will proceed one of us will contact you.

Randy J. Braun, CPESC, CMS4S
IDEM, Office of Water Quality
100 North Senate Avenue
MC 65-42, IGCN Room 1255
Indianapolis, Indiana 46204

Phone: 317-234-3980
Toll Free: 800-451-6027

Summit, Inc.
6901 West Chicago Avenue
Gary, IN 46406

December 9, 2010
CERTIFIED MAIL

IDEM-Office of Water Quality
Rule 6 Storm Water Coordinator
100 North Senate Avenue, Room 1255
Indianapolis, IN 46204

Subject: **Response to IDEM Notice of Deficiency (NOD)
Industrial Storm Water General Permit (Rule 6)
Summit, Inc. Permit #: INRM00192**

Dear IDEM Storm Water Coordinator,

Summit, Inc. is submitting the enclosed response to the Notice of Deficiency from IDEM for the Industrial Storm Water General Permit (Rule 6) Notice of Intent that was submitted July 17, 2010. The following listed deficiencies are addressed below:

- The number of outfalls that are associated with the facility
- An adequate location for each outfall that is associated with the facility. Each outfall shall be located on a map or plan of the industrial facility.
- If applicable, the identification of the outfalls that are substantially similar.
- If applicable, adequate information/reason describing the similarity between the outfalls listed as similar
- If applicable, the representative monitoring point for outfalls listed as similar.

The July 17th NOI stated that there are no existing storm water collection sewers or point source discharges at Summit, Inc. The number of outfalls currently associated with the facility is zero. In the event that erosion caused a storm water discharge, the waterbody affected would be the Grand Calumet River.

Summit prepared a Storm Water Pollution Prevention Plan (SWP3) in accordance with the Rule 6 requirements. A program has been established to conduct inspections, train employees, and monitor storm water if necessary. The best management plan adopted for the SWP3 is to prevent storm water discharges. The site is graded to prevent discharges and keep storm water on-site.

Summit recognizes that its industrial activities could affect storm water and create a storm water discharge from the facility. In the event that a storm water discharge is produced having the SWP3 program in place will insure compliance with regulatory requirements. The SWP3 will then be modified to show the adequate location on a map of the storm water discharge. IDEM will be notified of any changes to the SWP3 on the annual report due July 17th of each year, and will receive a monitoring report when necessary.

If you have any questions, please contact me at (219) 944-9749.

Sincerely,

Peter Coulopoulos,
General Manager

cc: Alison L. Benjamin, Attorney at Law
Thiros & Stracci, P.C.
200 East 90th Drive, Merrillville, IN 46410-8102



Track & Confirm

Search Results

Label/Receipt Number: **7008 1300 0000 8348 2033**

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Status: **Delivered**

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT***We Protect Hoosiers and Our Environment.**Mitchell E. Daniels Jr.*
Governor*Thomas W. Easterly*
Commissioner100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

November 24, 2010

65-42 WQS/RJB
Mr. Peter Coulopoulos
Summit Incorporated
6901 West Chicago Ave
Gary, Indiana 46406Re: **Notice of Deficiency (NOD)**Industrial Storm Water General Permit (Rule 6)
NOI Submittal
Summit Incorporated
Gary, IN
Lake County
Permit #: INRM00192

Dear Mr. Coulopoulos:

The Notice of Intent (NOI) letter submitted for the above referenced facility has been reviewed for completeness by staff of the Indiana Department of Environmental Management (IDEM). The NOI does not meet the requirements of the National Pollutant Discharge Elimination System (NPDES) general permit rules for storm water discharge associated with industrial activity (327 IAC 15-6).

The NOI was determined to be deficient because the item(s) identified below were incomplete, unclear, or not provided with the NOI submittal. This information is required by 327 IAC 15-6.

- The number of outfalls that are associated with the facility.
- An adequate location for each outfall that is associated with the facility. Each outfall shall be located on a map or plan of the industrial facility.
- If applicable, the identification of the outfalls that are substantially similar.
- If applicable, adequate information/reason describing the similarity between the outfalls listed as similar.
- If applicable, the representative monitoring point for outfalls listed as similar.

Please respond to the deficiencies identified in this letter in writing. Mail your response to:

Indiana Department of Environmental Management, Office of Water Quality
Storm Water Program
100 North Senate Avenue
MC 65-42, Room 1255
Indianapolis, Indiana 46204.

Summit Incorporated

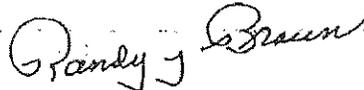
Page 2

An NPDES general permit number is assigned to each facility that has submitted an NOI to comply with 327 IAC 15-6. This number is used as an identification number and should be included with any future correspondence submitted to IDEM relating to the NPDES general permit for storm water. The general permit number assigned to this facility is: INRM00192.

Permittees can now manage their permit on-line, including permit amendments, renewals, terminations, and exclusions (i.e. no exposure) through the Regulatory Service Portal (RSP). The RSP may be accessed at <http://www.in.gov/idem/5964.htm>.

Any questions regarding this letter may be directed to Megan Nagle, Storm Water Specialist, at 317-234-5029 or 800/451-6027, extension 45029 or through e-mail at mnagle@idem.in.gov. Failure to respond within 30 days of receipt of this letter may result in a formal compliance action.

Sincerely,



Randy J. Braun, CPESC, CMS4S
Section Chief
Storm Water and Wetlands
Office of Water Quality



April 15, 2014

Summit, Inc.

6901 W. Chicago Ave.
Gary, IN 46406-

Work Order No.: 14D0219

Re:Autofluff

Dear Peter Coulopoulos:

Microbac Laboratories, Inc. - Chicagoland Division received 1 sample(s) on 4/4/2014 4:15:00PM for the analyses presented in the following report as Work Order 14D0219.

The enclosed results were obtained from and are applicable to the sample(s) as received at the laboratory. All sample results are reported on an "as received" basis unless otherwise noted.

All data included in this report have been reviewed and meet the applicable project specific and certification specific requirements, unless otherwise noted. A qualifications page is included in this report and lists the programs under which Microbac maintains certification.

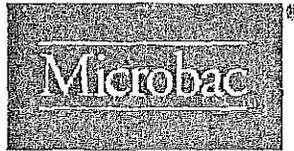
This report has been paginated in its entirety and shall not be reproduced except in full, without the written approval of Microbac Laboratories.

We appreciate the opportunity to service your analytical needs. If you have any questions, please contact your project manager. For any feedback, please contact Robert Crookston, Interim Managing Director, at robert.crookston@microbac.com.

Sincerely,
Microbac Laboratories, Inc.

A handwritten signature in black ink, appearing to read "Karen Ziolkowski", is written over a horizontal line.

Karen Ziolkowski
Senior Project Manager

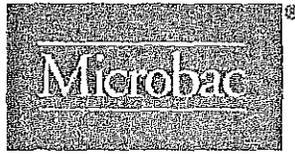


WORK ORDER SAMPLE SUMMARY

Date: *Tuesday, April 15, 2014*

Client: Summit, Inc.
Project: Autofluff
Lab Order: 14D0219

Lab Sample ID	Client Sample ID	Tag Number	Collection Date	Date Received
14D0219-01	Auto Fluff		04/04/2014 15:45	4/4/2014 4:15:00PM



CASE NARRATIVE

Date: *Tuesday, April 15, 2014*

Client: Summit, Inc.
Project: Autofluff
Lab Order: 14D0219

The Laboratory Control Sample associated with the sample failed the acceptance criteria for selenium. This is considered insignificant, as the bias was high yet the sample concentration was below the reporting limit.



Analytical Results

Date: *Tuesday, April 15, 2014*

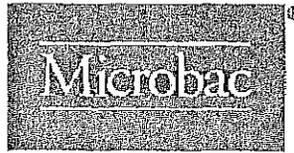
Client: Summit, Inc.
 Client Project: AutoFluff
 Client Sample ID: Auto Fluff
 Sample Description:
 Matrix: Solid

Work Order/ID: 14D0219-01
 Sampled: 04/04/2014 15:45
 Received: 04/04/2014 16:15

Analyses	Certs	AT	Result	RL	Qual	Units	DF	Analyzed
			Method: SW-846 8082		Analyst:als			
Polychlorinated Biphenyls			Prep Method: SW-846 3550B		Prep Date/Time: 04/09/2014 12:49			
Aroclor 1016	cgkn	A	ND	0.065	U	mg/Kg	1	04/15/2014 7:50
Aroclor 1221	cgkn	A	ND	0.065	U	mg/Kg	1	04/15/2014 7:50
Aroclor 1232	cgkn	A	ND	0.065	U	mg/Kg	1	04/15/2014 7:50
Aroclor 1242	cgkn	A	1.3	0.065		mg/Kg	1	04/15/2014 7:50
Aroclor 1248	cgkn	A	ND	0.065	U	mg/Kg	1	04/15/2014 7:50
Aroclor 1254	cgkn	A	0.25	0.065		mg/Kg	1	04/15/2014 7:50
Aroclor 1260	cgkn	A	ND	0.065	U	mg/Kg	1	04/15/2014 7:50
Aroclor 1262	kn	A	ND	0.065	U	mg/Kg	1	04/15/2014 7:50
Aroclor 1268	kn	A	ND	0.065	U	mg/Kg	1	04/15/2014 7:50
Total PCB's	kn	A	1.5	0.065		mg/Kg	1	04/15/2014 7:50
<i>Surr: Decachlorobiphenyl</i>	S		130	38-128	S	%REC	1	04/15/2014 7:50
<i>Surr: Tetrachloro-m-xylene</i>	S		55.0	40-130		%REC	1	04/15/2014 7:50

			Method: 1311/7470A		Analyst:AG			
TCLP Mercury by CVAA			Prep Method: SW-846 1311/SW-846 7470		Prep Date/Time: 04/08/2014 09:52			
Mercury	cgk	A	ND	0.0010		mg/L	1	04/08/2014 15:53

			Method: 1311/6010B		Analyst:SA			
TCLP Metals by ICP			Prep Method: SW-846 1311/SW-846 3005A		Prep Date/Time: 04/08/2014 09:05			
Arsenic	cgkn	A	ND	0.0100		mg/L	1	04/08/2014 15:25
Barium	cgk	A	0.711	0.500		mg/L	1	04/08/2014 15:25
Cadmium	cgkn	A	0.0257	0.00200		mg/L	1	04/08/2014 15:25
Chromium	cgkn	A	0.00760	0.00300		mg/L	1	04/08/2014 15:25
Lead	cgkn	A	0.792	0.00750		mg/L	1	04/08/2014 15:25
Selenium	cgkn	A	ND	0.0300		mg/L	1	04/08/2014 15:25
Silver	cgkn	A	ND	0.0100		mg/L	1	04/08/2014 15:25

**FLAGS, FOOTNOTES AND ABBREVIATIONS (as needed)**

B = Detected in the associated method Blank at a concentration above the routine RL
 b = Detected in the associated method Blank at a concentration greater than 2.2 times the MDL
 b* = Detected in the associated method Blank at a concentration greater than half the RL
 CFU = Colony forming units
 D = Dilution performed on sample
 DF = Dilution Factor
 g = Gram
 E = Value above quantitation range
 H = Analyte was prepared and/or analyzed outside of the analytical method holding time
 I = Matrix Interference
 J = Analyte concentration detected between RL and MDL (Metals / Organics)
 LOD = Limit of Detection
 m³ = Meters cubed
 MDL = Method Detection Limit
 mg/Kg = Milligrams per Kilogram (ppm)
 mg/L = Milligrams per Liter (ppm)
 NA = Not Analyzed
 ND = Not Detected at the Reporting Limit (or the Method Detection Limit, if used)
 NR = Not Recovered
 R = RPD outside accepted recovery limits
 RL = Reporting Limit
 S = Spike recovery outside recovery limits
 Surr = Surrogate
 U = Undetected
 > = Greater than
 < = Less than
 % = Percent

ANALYTE TYPES: (AT)

A,B = Target Analyte
 I = Internal Standard
 M = Summation Analyte
 S = Surrogate
 T = Tentatively Identified Compound (TIC, concentration estimated)

QC SAMPLE IDENTIFICATIONS

BLK = Method Blank	ICSA = Interference Check Standard "A"
DUP = Method Duplicate	ICSAB = Interference Check Standard "AB"
BS = Method Blank Spike	BSD = Method Blank Spike Duplicate
MS = Matrix Spike	MSD = Matrix Spike Duplicate
ICB = Initial Calibration Blank	ICV = Initial Calibration Verification
CCB = Continuing Calibration Blank	CCV = Continuing Calibration Verification
CRL = Client Required Reporting Limit	OPR = Ongoing Precision and Recovery Standard
PDS = Post Digestion Spike	SD = Serial Dilution
QCS = Quality Control Standard	

CERTIFICATIONS (Certs)

Below is a list of certifications maintained by the Microbac Merrillville Laboratory. All data included in this report has been reviewed for and meets all project specific and quality control requirements of the applicable accreditation, unless otherwise noted. Complete lists of individual analytes pursuant to each certification below are available upon request.

- a The American Association for Laboratory Accreditation [A2LA] for Biological Testing, ISO/IEC 17025 (Certificate# 3045.01)
- b The American Association for Laboratory Accreditation [A2LA] for Environmental Department of Defense Testing, ISO/IEC 17025 (Certificate# 3045.02)
- c Illinois EPA for the analysis wastewater and solid waste in accordance with the requirements of the National Environmental Laboratory Accreditation Program [NELAP] (accreditation #200064)
- d Illinois Department of Public Health for the microbiological analysis of drinking water (registry #1755266)
- e Indiana DEM approved support laboratory for solid waste and wastewater analyses
- f Indiana SDH for the chemical analysis of drinking water (lab #C-45-03)
- g Indiana SDH for the microbiological analysis of drinking water (lab #M-45-8)
- h Kansas Department of Health and Environment for the analysis of drinking water, wastewater, and solid hazardous waste in accordance with the requirements of the National Environmental Laboratory Accreditation Program [NELAP] (Certificate No. E-10397)
- i Kentucky EPPG for the analysis of samples applicable to the Underground Storage Tank program (lab #75)
- j New York SDOH in accordance with the requirements of the National Environmental Laboratory Accreditation Program [NELAP] (Lab#12006; accreditation #49179)
- k New York SDOH in accordance with the requirements of the National Environmental Laboratory Accreditation Program [NELAP] (Lab# 12006; accreditation #49386)
- l North Carolina DENR for the environmental analysis for NPDES effluent, surface water, groundwater, and pretreatment regulations (certificate #597)
- m Pennsylvania Department of Environmental Protection [NELAP] (Lab# 60-04663)
- n Washington State Department of Ecology in accordance to Ch. 173-50 WAC (lab #C992)
- o Wisconsin DNR for the chemical analysis of wastewater and solid waste (lab #398036710)



COOLER INSPECTION

Client Name: Summit, Inc.

Date: Tuesday, April 15, 2014

Date/Time Received: 04/04/2014 16:15

Work Order Number: 14D0219

Received by: James Meyer

Checklist completed by: 4/4/2014 4:49:00PM James Meyer

Reviewed by: 4/7/2014 KAZ

Carrier Name: Client Delivered

Cooler ID: Default Cooler

Container/Temp Blank Temperature: 21.0° C

After-Hour Arrival?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	
Shipping container/cooler in good condition?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not Present <input type="checkbox"/>
Custody seals intact on shipping container/cooler?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not Present <input checked="" type="checkbox"/>
Custody seals intact on sample containers?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not Present <input checked="" type="checkbox"/>
COC present?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	
COC included sufficient client identification?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	
COC included sufficient sample collector information?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	
COC included a sample description?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	
COC agrees with sample labels?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	
COC identified the appropriate matrix?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	
COC included date of collection?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	
COC included time of collection?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	
COC identified the appropriate number of containers?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	
Samples in proper container/bottle?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	
Sample containers intact?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	
Sufficient sample volume for indicated test?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	
All samples received within holding time?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	
If the samples are preserved, are the preservatives identified?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	

If No, adjusted by? _____

COC included the requested analyses?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	
COC signed when relinquished and received?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	
Samples received on ice?	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	
Samples properly preserved?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	
Voa vials for aqueous samples have zero headspace?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	No VOA vials submitted <input checked="" type="checkbox"/>

Cooler Comments: Size Reduction

ANY "NO" EVALUATION (excluding After-Hour Receipt) REQUIRES CLIENT NOTIFICATION.

Sample ID	Client Sample ID	Comments
14D0219-01	Auto Effuff	

Carpenter, Rebekah

From: Joanne Laramie [joanne.laramie@eptconsultants.com]
Sent: Friday, July 25, 2014 9:56 AM
To: Carpenter, Rebekah
Cc: pcoulopoulos@comcast.net; Patrick Gorman; Mark Thiros; Julee VanderSluis; Joyce Casillas
Subject: RE: Summit Inc. Industrial Storm Water General Permit (Rule 6)
Attachments: 2014-04-04 Auto Fluff Analytical.pdf

Rebecca,

Attached is the analytical of the auto fluff you requested. The test was conducted on 4/4/2014.

Thank you,

Joanne Laramie
Environmental Process Technologies, Inc.
9132 Indianapolis Boulevard
Highland, IN 46322
219-836-1000 (office)
joanne.laramie@eptconsultants.com

From: Carpenter, Rebekah [mailto:RCarpent@idem.IN.gov]
Sent: Wednesday, July 23, 2014 2:31 PM
To: Joanne Laramie
Subject: RE: Summit Inc. Industrial Storm Water General Permit (Rule 6)

Thanks, Joanne!

During the inspection, Mr. Coulopoulos had said that when fluff is sent to the landfill, it's tested first. Can you send me the test results from the last time that occurred? He said it had been a while, so I'm not sure when the last time was that a load went to the landfill.

Thanks!

Rebekah Carpenter
Industrial Waste Compliance Inspector
IDEM Northern Regional Office
300 N. Michigan St., Ste. 450
South Bend, IN 46601
(574) 245-4873 (office)
(574) 850-8185 (cell)
(574) 245-4877 (fax)
rcarpent@idem.in.gov

From: Joanne Laramie [mailto:joanne.laramie@eptconsultants.com]
Sent: Friday, July 11, 2014 10:31 AM
To: Carpenter, Rebekah
Cc: pcoulopoulos@comcast.net; Patrick Gorman; Mark Thiros; Joyce Casillas; Julee VanderSluis
Subject: Summit Inc. Industrial Storm Water General Permit (Rule 6)

Dear Rebekah,

As a follow up to your inquiry from your inspection on Wednesday July 9, 2014, I want to get back with you regarding industrial storm water permitting requirements for Summit 327 IAC 15-6. Summit currently has no storm water discharge from its facility. This issue has been investigated previously by Randy Braun and Doug Wolf of IDEM OWQ. I have attached correspondence and documentation to support this position.

Please contact me if you have any questions or need additional information.

Thank you,

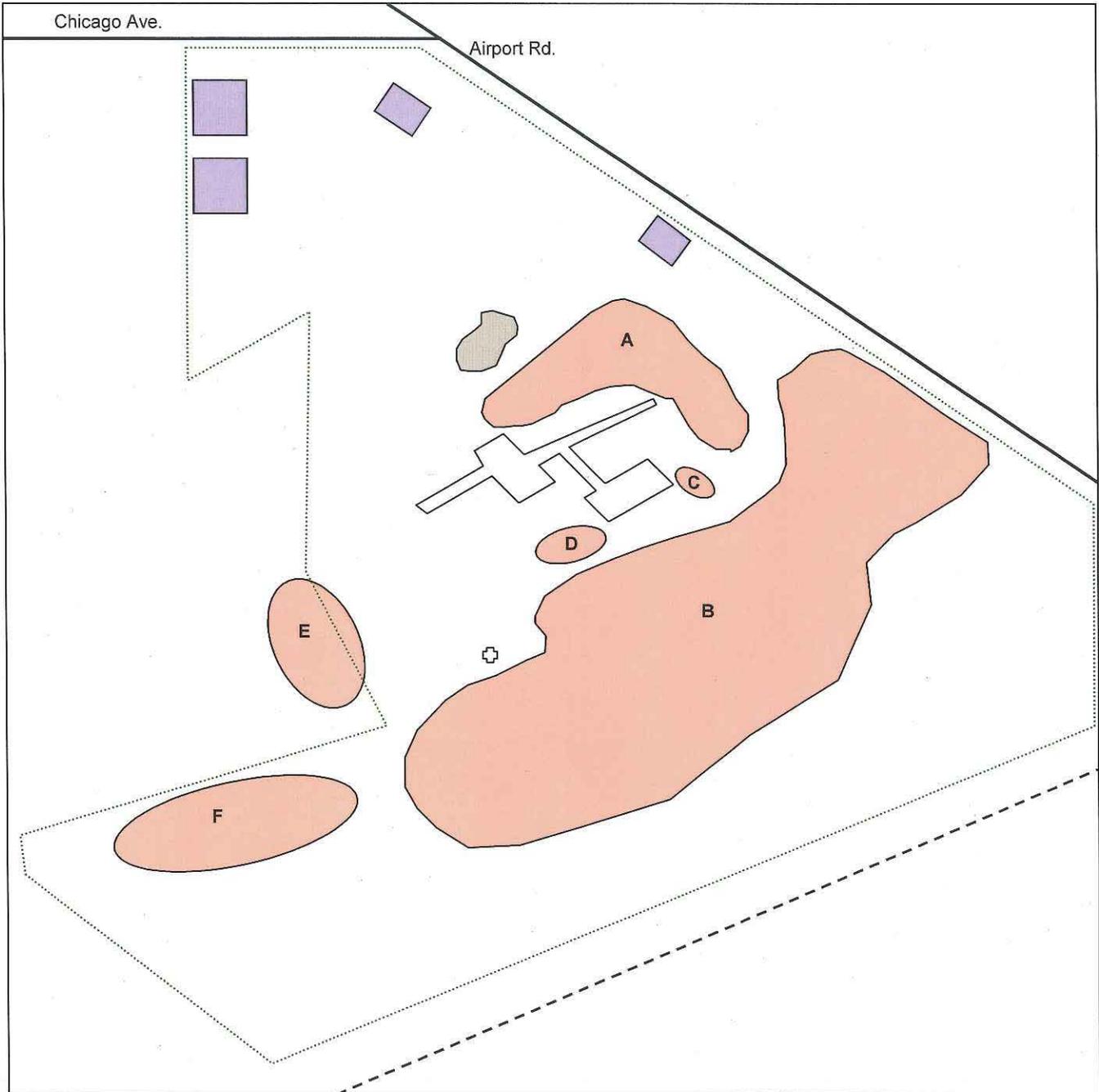
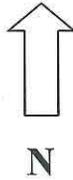
Joanne Laramie
Environmental Process Technologies, Inc.
9132 Indianapolis Boulevard
Highland, IN 46322
219-836-1000 (office)
joanne.laramie@eptconsultants.com

FACILITY DRAWING

Site: Summit, Inc. (6901 W. Chicago Ave., Gary)

Date: 7/9/14

Inspector: Rebekah Carpenter



LEGEND

- | | | | |
|-------------------------------|----------------------------|----------------|------|
| Road | Structure | Fluff piles | Pole |
| Approximate facility boundary | Shredder / Classifier area | Wood chip pile | |
| Railroad Tracks | | | |

CX 001455



NOTICE OF INSPECTION
State Form 50890 (R3 / 11-05)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Telephone: (800) 451-6027 or (317) 232-8603

This is to notify you that on 7/19/14 an inspection of Summit
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):

- _____
- _____
- _____
- Complaint fluff piles
- Multi-Media Screening Evaluation
- Other _____

Preliminary Inspection/Screening 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.

Single Media Inspection:

- 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) _____

Multi-Media Screening (Please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

- Multi-media screening not conducted.
- No violations were discovered with respect to the limited multi-media screening conducted by IDEM.
- Potential violations were discovered but corrected during the inspection.
- Potential violations were discovered and may be further investigated.

Pollution Prevention:

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that Indiana businesses increase productivity, generate less environmental wastes, reduce their regulatory responsibilities and become more profitable. Your participation in Indiana's pollution prevention program is entirely voluntary. If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance (OPPTA) at (317) 232-8172 or (800) 988-7901, or visit OPPTA's Web site at www.idem.IN.gov/oppta2/. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? Yes No

Compliance Assistance:

In addition to the compliance assistance offered by IDEM's individual programs, IDEM's Compliance and Technical Assistance Program (CTAP) offers free, confidential compliance assistance to regulated entities, including small businesses and municipalities, throughout Indiana. In the future, if you would like to request free, confidential compliance assistance, call (317) 232-8172 or (800) 988-7901, or visit CTAP's Web site at www.idem.IN.gov/ctap.

A summary of violations and concerns noted during the inspection was verbally communicated to the undersigned representative during the inspection. The facility should correct any violations noted as soon as possible. Violations identified and corrected during the inspection may still be cited as violations.

A written inspection summary will be provided within 45 days. In accordance with IC 13-14-5-4, matters not evident to IDEM at the time of the inspection might not be included in either the verbal or written inspection summary.

IDEM Representative:

Printed Name	Signature	Phone Number	Date	Time
Rebekah Carpenter	<i>[Signature]</i>	574-245-4873	7/19/14	In: 9:30 a. Out: 12:27 p.

Owner/Agent Representative:

Printed Name	Signature	Title	Phone Number	Date
PETER COULOPOULOS	<i>[Signature]</i>	GM	2199026128	7/9/14

DISTRIBUTION: White – IDEM Public File; Canary – Office of Pollution Prevention and Technical Assistance [if OPPTA assistance is requested] or IDEM Representative (i.e., Inspector) [if OPPTA assistance is not requested]; Pink – Owner/Agent Representative

Anderson, Sybil

From: Rosado, Elizabeth
Sent: Thursday, September 25, 2014 4:19 PM
To: oaljfilng
Subject: In the matter of - Summit Inc RCRA-05-2014-0006 - Notice of Request to File an Index to Complainant's Rebuttal Prehearing Exchange
Attachments: 20140925135018005.pdf
Importance: High

Office of Administrative Law Judges:

Please find enclosed a Notice of Request to File an Index to Complainant's Rebuttal Prehearing Exchange.