



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

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

Eric J. Holcomb  
Governor

Bruno L. Pigott  
Commissioner

October 4, 2018

### **VIA EMAIL**

Mr. Gary Huddleston  
Real Alloy Specification, Inc.  
4525 West Old Hwy 24  
Wabash, IN 46992

Dear Mr. Huddleston:

Re: Inspection Summary Letter  
Real Alloy Specification, Inc.  
EPA ID #: IND 005 243 449  
Solid Waste Program ID 85-06  
Wabash, Wabash County

On September 19, 2018, representatives of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Real Alloy Specification, Inc., located at 4525 West Old Hwy 24, Wabash, 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: Non-MSWLF

Results of Inspection: *No violations were cited. See inspection report.*

Please direct any response to this letter and any questions to me at (317) 409-5430 or via email at [lfreeman@idem.IN.gov](mailto:lfreeman@idem.IN.gov).

Sincerely,

Lori Freeman, Sr. Env. Manager  
Industrial Waste Compliance Section  
Compliance and Response Branch  
Office of Land Quality

Enclosure

cc: Wabash County Health Department



# RESTRICTED WASTE SITE TYPE I OR II INSPECTION REPORT

State Form 53908 (1-09)  
INDIANA STATE DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

INDIANA DEPARTMENT OF  
ENVIRONMENTAL MANAGEMENT  
Industrial Waste Compliance Section  
Office of Land Quality  
100 N. Senate Ave.  
Mail Code 65-45  
Indianapolis, IN 46204-2251

<b>Facility Name</b> Real Alloy Specification, Inc. (formerly Aleris Specification Alloys, Inc.)		
<b>EPA Identification Number</b> IND 005 243 449		
<b>Location</b> 4525 W. Old 24		
<b>City</b> Wabash	<b>County</b> Wabash	<b>ZIP Code</b> 46992
<b>Inspector</b> Lori Freeman		<b>Inspection Date</b> (month, day, year) 09/19/2018
<b>Other IDEM Representatives</b> Monica Dick		
<b>Primary contact during inspection</b> Brain Poitras		

A. Pre-Inspection File Review		
<b>On-Site Disposal Notification Date</b> (month, day, year) N/I		
<b>Restricted Waste Site Facility Type/Issuance Date</b> (month, day, year) Non-MSWLF (Solid Waste Program ID 85-06) issued: 02/03/014 (Expires:02/01/2019)		
<b>Restricted Waste Site Permit Reviewed by Inspector:</b> Date (month, day, year) 09/19/2018		
<b>Wastestream(s) permitted for disposal generated by facility</b>		
<b><u>Wastestream(s) Classified</u></b>	<b><u>Classification Number</u></b>	<b><u>Expiration Date(s)</u></b> (month, day, year)
Dryer Baghouse Dust Refractory Reverb Furnace Baghouse Dust Assay Furnace Baghouse Dust	Facility does not have classification numbers. The facility was issued an on-site non-municipal solid waste landfill permit on 02/03/2014	8/15/2019
<b>Other wastestream(s) approved for disposal (such as those generated by other facilities):</b> The facility is allowed to accept waste generated by other Aleris facilities provided the wastestream(s) has/have been approved by IDEM prior to disposal.  Expired Waste Streams [Aleris - Coldwater, MI facility] Furnace Baghouse Dust Cyclone Baghouse Dust Dryer Baghouse Dust North Afterburner Baghouse Dust Rotary Furnace Baghouse Dust		
<b>Treated wastestream(s) {hazardous or non-hazardous}:</b>		
<b>Previous Inspections:</b> 03-26-2018		
<b>Unresolved violations/comments:</b> None		

## B. Restricted Waste Site Inspection Comments

The management of reactive aluminum wastes has been monitored by IDEM since fires generating significantly high heat values have occurred at aluminum waste sites. Monitoring and testing procedures for the management of these wastes streams have been developed by Real Alloy Specification, Inc. (formerly Aleris Specification Alloys) and have been included in the permit requirements. Temperature monitoring requirements are being checked every day and daily records are being kept.

The processes generating the following former wastes at this Real Alloy facility were shut down several years ago: dross mill baghouse dust, dross mill dust silo, rotary salt cake, and rotary baghouse dust. Therefore, these wastes are no longer disposed of in the landfill. No off-site waste is currently being received by the facility. Dross generated on-site is being taken to another facility in Wabash located at 109 Dimension Avenue.

IDEM staff toured the landfill (see photos 1-3). The monitoring wells checked were locked and labeled. No major erosion issues were noted on the side slopes during this inspection.

During a previous inspection, IDEM staff noted a possible seep on the southwest corner of the landfill. Mr. Huddleston confirmed there was a seep in this area. Mr. Huddleston stated that when there are heavy rains, liquid seeps through the berm separating the constructed and unconstructed areas of the landfill. Mr. Huddleston stated that a trench has been dug near the seep to collect any liquid and sump pump has been placed in the trench to pump the liquid back in to the constructed cell so that the liquid is handled via their leachate control system. Mr. Huddleston submitted an insignificant modification to IDEM on June 7, 2018 to repair the seep area (VFC # 82557041). **IDEM staff will monitor this area during future inspections.**

IDEM staff was able to examine landfill inspection reports and temperature monitoring records during the inspection. IDEM staff also examined the quarterly plot plan.

## C. Restricted Waste Site Inspection Summary

C.1

**Violations. The checklist below is not comprehensive, but includes the most common violations. Checked violations and additional violations are described in detail in Section C.2 and include location information, corrective measures, and compliance dates. Appropriate documentation, photographs and maps may also be attached. When appropriate, a representative portion of a facility or documents may be inspected. A description of those portions inspected is provided in Section B, Restricted Waste Site Inspection Comments.**

<input type="checkbox"/> 1) Permit Compliance 329 IAC 10-13-4(c)	<input type="checkbox"/> 17) First Aid Kit 329 IAC 10-28-7(b)	<input type="checkbox"/> 33) Establish & Maintain Vegetation 329 IAC 10-28-14(b)
<input type="checkbox"/> 2) Established Roadways 329 IAC 10-28-1(a)	<input type="checkbox"/> 18) Communications System 329 IAC 10-28-7(c)	<input type="checkbox"/> 34) Proper Grading 329 IAC 10-28-14(c)
<input type="checkbox"/> 3) Restricted Access 329 IAC 10-28-1(b)	<input type="checkbox"/> 19) On-Site/Up to Date Plans 329 IAC 10-28-8(a)	<input type="checkbox"/> 35) Vegetation Clearing 329 IAC 10-28-14(d)
<input type="checkbox"/> 4) Passable Roads 329 IAC 10-28-2(a)	<input type="checkbox"/> 20) Quarterly Plot Plans 329 IAC 10-28-8(b)	<input type="checkbox"/> 36) Surface Leachate Management 329 IAC 10-28-15(a)
<input type="checkbox"/> 5) Tracking Mud 329 IAC 10-28-2(b)	<input type="checkbox"/> 21) Furnishing Records to IDEM 329 IAC 10-28-8(c)	<input type="checkbox"/> 37) Leachate 50ft Beyond SW Boundary 329 IAC 10-28-15(b)
<input type="checkbox"/> 6) Monitoring Well Access 329 IAC 10-28-2(c)	<input type="checkbox"/> 22) Open Burning 329 IAC 10-28-9	<input type="checkbox"/> 38) Leachate Disposal 329 IAC 10-28-16
<input type="checkbox"/> 7) Signs 329 IAC 10-28-3	<input type="checkbox"/> 23) Waste Deposited in Water 329 IAC 10-28-10(a)	<input type="checkbox"/> 39) Groundwater Monitoring Wells 329 IAC 10-28-17
<input type="checkbox"/> 8) Livestock Present 329 IAC 10-28-4(a)	<input type="checkbox"/> 24) Cover Soil Type 329 IAC 10-28-11(a)	<input type="checkbox"/> 40) Explosive Gases 329 IAC 10-28-19
<input type="checkbox"/> 9) Vector, Dust, Odor 329 IAC 10-28-4(b)	<input type="checkbox"/> 25) Cover Maintenance/ Alt. Cover Approval 329 IAC 10-28-11(b)	<input type="checkbox"/> 41) Leachate Collection 329 IAC 10-28-20

<input type="checkbox"/> 10) Litter 329 IAC 10-28-4(c)	<input type="checkbox"/> 26) Working Face Size (RWS I Only) 329 IAC 10-28-12(a)(1)	<input type="checkbox"/> 42) Closure Performance Standards 329 IAC 10-30-1
<input type="checkbox"/> 11) Dead Animal Disposal 329 IAC 10-28-4(d)	<input type="checkbox"/> 27) Cover Application & Compaction (RWS I Only) 329 IAC 10-28-12(a)(2)	<input type="checkbox"/> 43) Final Cover (RWS I Only) 329 IAC 10-30-2(a)
<input type="checkbox"/> 12) Outside Containers 329 IAC 10-28-4(e)	<input type="checkbox"/> 28) Intermediate Cover (RWS I Only) 329 IAC 10-28-12(a)(3)	<input type="checkbox"/> 44) Top Soil (RWS I Only) 329 IAC 10-30-2(b)
<input type="checkbox"/> 13) Scavenging 329 IAC 10-28-5	<input type="checkbox"/> 29) Cover Application & Compaction (RWS II Only) 329 IAC 10-28-12(b)	<input type="checkbox"/> 45) Final Cover (RWS II Only) 329 IAC 10-30-3(a)
<input type="checkbox"/> 14) Salvage Operations 329 IAC 10-28-6(a)	<input type="checkbox"/> 30) Fugitive Dust 329 IAC 10-28-13(a)	<input type="checkbox"/> 46) Top Soil (RWS II Only) 329 IAC 10-30-3(b)
<input type="checkbox"/> 15) Salvage Storage 329 IAC 10-28-6(b)	<input type="checkbox"/> 31) Daily Cover/Control Plan 329 IAC 10-28-13(b)	<input type="checkbox"/> 47) Other
<input type="checkbox"/> 16) Safety Devices 329 IAC 10-28-7(a)	<input type="checkbox"/> 32) Cover Continuous Maintenance 329 IAC 10-28-14(a)	

<b>C.2</b>	<b>Violation descriptions: Includes observed violations with corresponding regulatory citations and permit conditions (when applicable), corrective measures and compliance dates.</b>
<p><b>No violations were cited during the September 19, 2018 inspection.</b></p>	

<b>ATTACHMENTS:</b> <input type="checkbox"/> FACILITY MAP WITH LOCATION OF REGULATED WASTE ACTIVITY AND AREAS OF ENVIRONMENTAL CONCERN <input checked="" type="checkbox"/> PHOTO LOG <input type="checkbox"/> ADDITIONAL DOCUMENTATION:
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Photo 1

Facility Name: Real Alloy Specification, Inc.

Photographer: Lori Freeman

Date: September 19, 2018

Others Present: Monica Dick (IDEM) and Brian Poitras (facility)

Location & Description: Side slope above the working face.



Photo 2

Facility Name: Real Alloy Specification, Inc.

Photographer: Lori Freeman

Date: September 19, 2018

Others Present: Monica Dick (IDEM) and Brian Poitras (facility)

Location & Description: Working face.

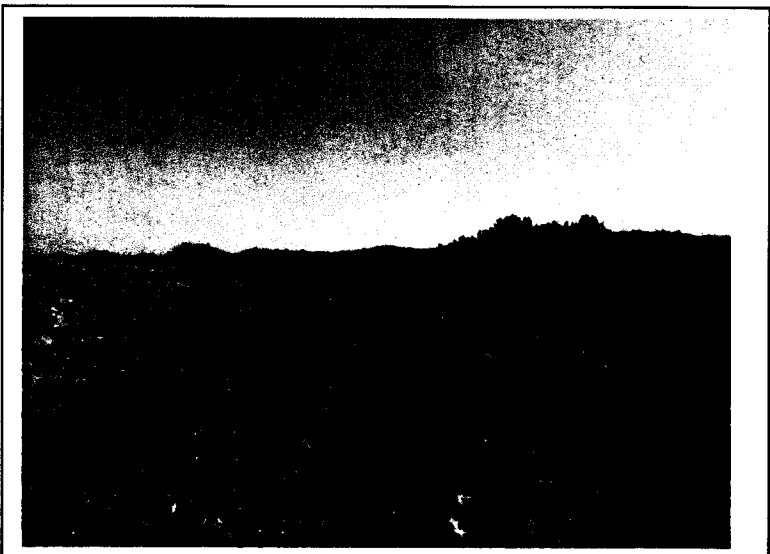


Photo 3

Facility Name: Real Alloy Specification, Inc.

Photographer: Lori Freeman

Date: September 19, 2018

Others Present: Monica Dick (IDEM) and Brian Poitras (facility)

Location & Description: Working face.



**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 9/18/18 an inspection of Real Alloys  
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):**

☒ RWS  
☐  
☐

☐ 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/](http://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](http://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
Lori Freeman		317-409-5420	9/19/18	In: 10:40 Out: 11:20

**Owner/Agent Representative:**

Printed Name	Signature	Title	Phone Number	Date
Bryan Portas		Supervisor	260-563-7461	9-19-18

**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