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## 30-Day Short-Term Response Update

*Indiana Transportation Museum*  
825 Forest Park Drive  
Noblesville, IN 46060

### Prepared By

Pat Likins

### Reviewed By

James P. Hogan, LPG  
June 29, 2017





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# 1 Introduction

The Indiana Transportation Museum, Inc. (“ITM”) provides the below *Short-Term Remediation Plan* (“STRP”) per the City of Noblesville’s (“City’s”) demand of 5/30/17. The STRP is effectively a schedule of activities necessary to rectify potential violations and regulatory compliance initiatives.

The City of Noblesville (“City”) issued its letter to the ITM on 5/30/17<sup>1</sup> that explained how the WRTV-6 news media outlet informed the City that it observed several chemicals and petroleum products that appeared to be improperly stored and sealed when it visited the ITM during the week of 5/15/17. Additionally, WRTV-6 observed chemical staining on the grounds of the maintenance area. In response, the City inspected the property it leases to the ITM (“Property”) <sup>2</sup> on 5/17/17, reported its observations to the Indiana Department of Environmental Management (“IDEM”), who in turn inspected the Property on 5/31/17.<sup>3</sup>

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<sup>1</sup> City, 2017, *Hazardous Spills at the Site of the Indiana Transportation Museum*, TO: Craig Presler, Indiana Transportation Museum, Inc., David Wilcox, Indiana Transportation Museum Foundation, LLC, Craig Presler, ITM Railroad Operations, LLC, and Michelle Yerkeson, ITM Assets, LLC, FROM: Mayor John Ditslear, City of Noblesville and Scott Noel, President, Noblesville Parks and Recreation Board, 5/30/17.

<sup>2</sup> The legal description of the Property is under review by a licensed surveyor to determine the perimeter of the leasehold.

<sup>3</sup> IDEM, 2017, *Notice of Liability and Information Request*, TO: Mayor John Ditslear, City of Noblesville, Craig Presler, Registered Agent, Indiana Transportation Museum, Inc., FROM: Harry Atkinson, State Cleanup Section Chief, IDEM Office of Land Quality, 6/9/17.

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## 2 Points of Contact

The ITM takes this matter very seriously. As a result, the ITM has retained several points of contact to handle communications associated with this matter as outlined below.

### **2.1 ITM Points of Contact**

Mr. John McNichols  
Chair  
Indiana Transportation Museum Inc.  
P.O. Box 83  
Noblesville, IN 46061

Mr. Les McConnell  
Vice Chair  
Indiana Transportation Museum Inc.  
P.O. Box 83  
Noblesville, IN 46061

### **2.2 Legal Point of Contact**

The ITM may be reached through Barnes & Thornburg LLP as its legal counsel in this matter. The ITM's point of contact at Barnes & Thornburg is:

Mr. David Gillay, Esq.  
Barnes & Thornburg LLP  
11 South Meridian Street  
Indianapolis, IN 46204-3535

[david.gillay@BTLaw.com](mailto:david.gillay@BTLaw.com)  
(317) 231-7474



IDEM SCP No. 7100207  
Project No. INHN825P1.2  
Date: 6/29/17

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### **2.3 Environmental Consultant Point of Contact**

The ITM retained The Environmental Liability and Asset Management Group, LLC (dba The ELAM Group) as its environmental consultant. The point-of-contact and Licensed Professional overseeing this matter is:

James P. Hogan, LPG #2166  
President & CEO  
The ELAM Group  
176 W. Logan Street, Suite 147  
Noblesville, IN 46060

[james.hogan@elamusa.com](mailto:james.hogan@elamusa.com)  
(888) 510-3526 x102



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## 3 Response Procedures & Timeline

Since the ITM received the City's letter on 6/1/17, it has conducted several actions over the past 30 days and has several more planned as described below, including inventory, containment and removal of chemicals from the Property according to generally accepted containment, characterization, transportation and disposal standards. Once characterized, the waste will be transported to and disposed within properly hazardous or nonhazardous landfill(s) accordingly. Waste manifests will document the generator, transporter and disposal facility(ies) involved with the process.

The waste characterization, transportation and disposal activities will be conducted under the direction of The ELAM Group. The following narrative provides the City with a schedule of these activities.

### **3.1 30-Day Response Actions (Complete)**

- ☐ Thursday, 6/1/17
  - ☐ The ITM receives the City's letter.
- ☐ Friday, 6/2/17
  - ☐ The ITM schedules a meeting with The Environmental Liability & Asset Management Group, LLC (dba The ELAM Group) and Barnes & Thornburg LLP to discuss the City's letter.
- ☐ Saturday, 6/3/17
  - ☐ The ITM's initial meeting with The ELAM Group and Barnes & Thornburg LLP occurred, including a tour of the facility and initial observations connected to an environmental audit.
- ☐ Sunday, 6/4/17
  - ☐ The ITM retained The ELAM Group as its environmental consultant and David Gillay, Esq., of Barnes & Thornburg LLP as its environmental attorney.
- ☐ Monday, 6/5/17
  - ☐ The ITM arranged for its volunteers to walk the site with The ELAM Group on 6/9/17.



☐ Wednesday, 6/7/17

- ☐ The ITM issued a letter to the City acknowledging receipt of its 5/30/17 letter and notified the City that it has retained an environmental consultant and legal counsel.<sup>4</sup>
- ☐ The City informed the ITM that IDEM requested a visit to the Property on 6/8/17.
- ☐ The ITM replied to the City that it had already arranged for an environmental audit on 6/9/17 and that the ITM could not be available on 6/8/17.
- ☐ The City and the ITM mutually agreed to have IDEM's inspection occur on the same day as The ELAM Group's independent environmental audit.

☐ Friday, 6/9/17

- ☐ The ELAM Group conducts an environmental audit of the ITM property.
- ☐ Representatives of IDEM's *Hazardous Waste Compliance Section* ("HWC") were accompanied by a representative from the City's consultant (Keramida), the City, the ITM and The ELAM Group.
- ☐ During a debriefing following the inspection, Mr. Scott Drachsil of the HWC said that there were no major violations, but Ms. Susan Lowry of the HWC said that there was a need for waste determinations. The site visit form is included as Appendix A.
- ☐ The ELAM Group initiates responses to IDEM's *Notice of Liability and Information Request*, dated 6/9/17 ("Notice").<sup>3</sup>

☐ Tuesday, 6/13/17

- ☐ The ELAM Group returned to the Property to complete its environmental audit.

☐ Tuesday, 6/20/17

- ☐ The ELAM Group returned to the Property to cross-reference rail car contents to location on the tracks.

☐ Thursday, 6/22/17

- ☐ Representatives of IDEM's *Industrial Compliance Section* ("ICS") were accompanied by a representative from the ITM and The ELAM Group. The ICS and The ELAM Group split samples collected on and proximate to

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<sup>4</sup> ITM, 2017, <No Title>, TO: Mayor John Ditslear, FROM: John McNichols, Chair, ITM, 6/7/17.

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equipment donated by Firestone. The samples are undergoing analysis of collected polychlorinated biphenyls ("PCBs").

☐ Tuesday, 6/27/17

- ☐ The ELAM Group returned to the Property to characterize stockpile soil and soil and water within a temporary pit that was dug beneath a track located northwest of the northwest corner of the ITM's engine and railcar maintenance building. The samples are undergoing analysis of PCBs, volatile organic compounds ("VOCs"), semi-volatile organic compounds ("SVOCs") and Resource Conservation & Recovery Act (RCRA) 8 metals ("RCRA 8 metals").

☐ Wednesday, 6/28/17

- ☐ The ELAM Group assists the ITM with preparation of its *Self-Disclosure and Environmental Audit*<sup>5</sup> of the Property per IC 13-11-2-69.
- ☐ Barnes & Thornburg LLP sends the environmental audit to IDEM's Self-Disclosure and Environmental Audit Administrator. The audit and cover letter are included in Appendix B.

☐ Thursday, 6/29/17

- ☐ This STRP is submitted to the City per the City's 5/30/17 demand.

### **3.2 30 to 60-Day Response Timeline**

☐ Due Friday, 7/7/17

- ☐ Detailed chemical inventory of the ITM documenting each container's volume, label, expiration date, safety data sheet (SDS), and location cross-referenced to a map

☐ Due Saturday, 7/29/17

- ☐ Complete waste determination and containment measures
- ☐ Complete a Containment Plan

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<sup>5</sup> IDEM's *Self-Disclosure and Environmental Audit* State Form 55075 (8-12)





IDEM SCP No. 7100207  
Project No. INHN825P1.2  
Date: 6/29/17

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### **3.3 60 to 90-Day Response Timeline**

- ☐ Due Monday, 8/28/17
  - ☐ A Remediation Plan (“RP”) to the City documenting all of the information contained in the CP and a detailed timetable for the investigation and remediation of the Property, if necessary



IDEM SCP No. 7100207  
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## 4 Summary

The ITM is dedicating adequate resources to the tasks necessary to comply with the demands of the City as well as the laws of the State of Indiana. The ITM looks forward to meeting with the City to discuss this schedule and that of the recent *Notice of Liability and Information Request* from IDEM, dated 6/9/17.



Project No. INHN825P1.2

Date: 6/29/17

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# **Appendix A**

## **IDEM Notice of Inspection**

**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 6/9/17 an inspection of Indiana Transportation Association 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  
☐ 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
Scott Damschke	[Signature]	317-418-9797	6/9	In: 8:00 Out: 12:30

**Owner/Agent Representative:**

Printed Name	Signature	Title	Phone Number	Date
Leslie McConaha	[Signature]	VP	317-418-9797	6/9/17



# Appendix B

## Self-Disclosure & Environmental Audit

June 28, 2017

Self-Disclosure & Environmental Audit Administrator  
Indiana Department of Environmental Management  
Mail Code 60-02P  
100 North Senate Avenue, IGCN 1301  
Indianapolis, IN 46204-2251

Re: Self-Disclosure & Environmental Audit Policy  
Voluntary Disclosure of Possible Violations  
The Indiana Transportation Museum Inc.

Dear Sir or Madam:

The Indiana Transportation Museum Inc. ("ITM") is the operator of a train museum and depot for heritage train rides. Solid and liquid chemicals are required to restore and maintain the ITM's safe operations of its historic engines, railcars and track. The chemicals are used within the premises and are stored within its leased property. The ITM is voluntarily disclosing potential violation(s) related to compliance with the Occupational Safety & Health Administration's (OSHA's) Hazard Communication Standard (29 CFR 1910.1200), the National Pollutant Discharge Elimination System (NPDES) permit process (327 IAC 5-2-2) and stormwater discharge management (327 IAC 15-6-2) .

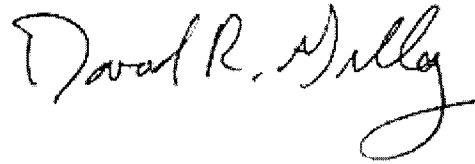
In making this self-disclosure, it is the ITM's intent to invoke the Indiana Department of Environmental Management's ("IDEM") *Self-Disclosure and Environmental Audit Policy*, MP-004-R2-NPD, as amended (effective February 5, 2010) ("Policy"). This self-disclosure is being made within the timeframe required by the Policy.

The ITM submits this self-disclosure out of abundance of caution and to further its policy of transparency with IDEM. In disclosing this potential noncompliance, the ITM seeks the full protection of the Policy. Because each of the Policy's nine (9) conditions for a small "regulated entity" has been met, any potential or actual violation related to this disclosure and the aforementioned environmental requirements should be exempt from any gravity-based penalty. The ITM presents the following justifications for compliance with each requirement of the Policy:

1. **Systemic Discovery.** The ITM first learned of the potential violations identified herein through a compliance audit voluntarily undertaken to identify potential noncompliance with respect to potentially applicable Indiana laws and rules.
2. **Voluntary Discovery.** The potential violations described herein were identified voluntarily by the ITM and not through any legally mandated procedure.
3. **Prompt Disclosure.** The audit was performed by ITM's consultant, The Environmental Liability & Asset Management Group, LLC (dba The ELAM Group) commencing on or about June 3, 2017, with a final determination related to possible violations of 29 CFR 1910.1200, 327 IAC 5-2-2 and 327 IAC 15-6-2 made on or about June 28, 2017. These potential violations are disclosed in Attachment A of the *Self-Disclosure and Environmental Audit* form (IDEM State Form 55075), attached as **Exhibit 1**.
4. **Discovery and Disclosure Independent of Government or Third-Party Plaintiff.** As no federal, state, or local agency inspection, citizen suit, complaint, reporting, or imminent discovery of the potential violations described herein has occurred, these potential violations are being identified and disclosed prior to discovery by a governmental agency or third party.
5. **Correction and Remediation.** The ITM commits to correcting any potential violations in accordance with MP-004-R2-NPD and its compliance audit. The ITM is currently developing Best Management Practices ("BMPs") to properly guide itself under 29 CFR 1910.1200, 327 IAC 5-2-2 and 327 IAC 15-6-2 to ensure future compliance after the corrective measures are complete.
6. **Prevent Recurrence.** The ITM is currently developing Best Management Practices ("BMPs") to properly guide itself under 29 CFR 1910.1200, 327 IAC 5-2-2 and 327 IAC 15-6-2 to help train its volunteers on how to prevent recurrence. It is the ITM's belief that its internal processes that are under development, including the ITM's internal environmental audit program, is designed to prevent a recurrence of potential violations of this nature.
7. **No Repeat Violation.** The ITM is not aware of any prior violation from IDEM as it relates to 29 CFR 1910.1200, 327 IAC 5-2-2 and 327 IAC 15-6-2.
8. **Other Violations Excluded.** The ITM does not believe the potential violations disclosed herein have resulted in actual harm or presented an imminent or substantial endangerment to human health or the environment.
9. **Cooperation.** The ITM commits to cooperate with IDEM with information as is necessary and as requested to determine the applicability of the Policy.

Thank you for receiving this submission. If you have any questions or need any further information, please do not hesitate to contact me directly.

Sincerely,

A handwritten signature in black ink, reading "David R. Gillay". The signature is fluid and cursive, with the first name "David" and last name "Gillay" clearly legible.

David R. Gillay, Esq.

cc: Mr. John McNichols, ITM Chair  
Mr. Les McConnell, ITM Vice Chairman  
Mr. James P. Hogan, The ELAM Group





## SELF-DISCLOSURE AND ENVIRONMENTAL AUDIT

State Form 55075 (8-12)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT (IDEM)

**INSTRUCTIONS:** A copy of IDEM's Self-Disclosure and Environmental Audit Policy can be obtained by visiting IDEM's website at [http://www.in.gov/idem/files/npd\\_mp\\_004\\_r2.pdf](http://www.in.gov/idem/files/npd_mp_004_r2.pdf). For questions on how to complete a self disclosure, please contact IDEM's Compliance and Technical Assistance Program: toll-free (within Indiana) at 1-800-451-6027, press 0 and ask for extension 2-8172 or 317/232-8172 or by email at [ctap@idem.in.gov](mailto:ctap@idem.in.gov). Completed Self-Disclosures should be sent via certified U.S. Mail to:

Self-Disclosure and Environmental Audit Administrator  
Indiana Department of Environmental Management  
Mail Code 60-02P  
100 North Senate Avenue, IGCN 1301  
Indianapolis, Indiana 46204-2251

FACILITY INFORMATION				
Name Indiana Transportation Museum (ITM)				Is the regulatory entity a new owner? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Physical Street Address (number and street) 825 Forest Park Drive				Is the facility a small regulated entity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
City Noblesville	State IN	ZIP Code 46060	NAICS Code	SIC Code
IDEM Program ID(s) (i.e., Plant ID, NPDES, RCRA, FID, CAFO/Farm ID, PWSID, Source ID) Not Applicable				
Mailing Street Address (if different from physical address) P.O. Box 83				
City Noblesville	State IN	ZIP Code 46061-0083	Website itm.org	
AUTHORIZED CONTACT				
The authorized contact person is authorized by the entity to make such a disclosure and has authority to perform policy or decision-making functions of the company.				
Name John McNichols			Job Title Chairman, ITM	
Email address jmcnichols@mwbb.net			Telephone number (with area code) (317) 439-3630	
Contact Street Address (if different from physical and/or mailing address, please specify)				
City	State	ZIP Code	Fax Number (with area code)	
VIOLATION(S) INFORMATION				
If more than one violation exists, each should be enumerated separately and described as completely as possible.				
Description of Violation: The following violations were observed: (1) no or inadequate hazard communications, (2) no water discharge permit and (3) no stormwater pollution prevention plan. These violations, the applicable code violations, the corrective measures and the compliance dates are summarized in a chart included in Attachment A.				
How was the violation discovered? The ELAM Group inspected the property on 8/3/17 and were retained on 6/4/17 to conduct a comprehensive multimedia environmental audit on 6/9/17.			Date the violation was discovered (month, day, year)  6/9/2017	

Physical location of the violation:

The violations were discovered within a fenced area and in rail cars, both of which are accessible only to the volunteers and contracted employees of the ITM.

Other Comments:

The property boundary is being confirmed by a licensed surveyor.

**CONDITIONS REQUIRED UNDER THE SELF-DISCLOSURE AND AUDIT POLICY**

*In addition to answering Yes/No, please provide a detailed explanation of how each of the 9 Audit Policy conditions have been met.*

1. Was the violation discovered through an environmental audit or Compliance Management System?

If the violation was discovered through a Compliance Management System, provide information on how the System meets IDEM's requirement of "an objective, documented, systematic procedure or practice reflecting the [facility's] due diligence in preventing, detecting and correcting violations," including documentation as to how the facility implements its system. If applicable, include details regarding the facility's receipt of governmental or government supported compliance assistance.

☒ Yes ☐ No

Explain: The ELAM Group inspected the property on 6/3/17. The ITM subsequently retained The ELAM Group on 6/4/17 to conduct a comprehensive multimedia environmental audit on 6/9/17.

2. Was the violation identified voluntarily and not through a monitoring, sampling, or auditing procedure that is required by statute, regulation, permit, judicial or administrative order, or consent agreement? (*See Policy for a regulated entity with a new owner.*)

☒ Yes ☐ No

Explain:

3. Was the disclosure prompt? The facility must demonstrate that the violation was disclosed within forty-five (45) days after it discovered the violation occurred or may have likely occurred.

☒ Yes ☐ No

Explain:

4. Was the discovery and disclosure independent of a government or third party plaintiff? The facility must demonstrate that it took the initiative to find the violation and report it, rather than reacting to knowledge of a pending enforcement action or third party complaint.

☒ Yes ☐ No

Explain: The violations outlined in Attachment A are independent of the City of Noblesville's (City's) and the Indiana Department of Environmental Management's (IDEM's) inspections conducted on 5/17/17 and 5/31/17, respectively.

5. Was the violation corrected at the time of disclosure?

☐ Yes ☒ No

If yes, provide a statement certifying that the violation has been corrected. If no, provide details of how the violation will be corrected within sixty (60) days after the date the facility notified IDEM of the violation. (*See Policy if more than sixty (60) days are needed to correct the violation.*)

Because the ITM is an organization of less than 100 employees, it qualifies as a "small regulated entity" per IDEM's Agency Nonrule Policy Document (NPD) No. MP-004-R2-NPD. Accordingly, the ITM commits to correcting the violations per Section 6.5(b) of this NPD.

6. What measures are being taken to prevent recurrence of the violation and when will those measures be implemented?

See Attachment A for details of the corrective measures.

7.a. Has the same (*or closely related violation*) occurred previously at this facility within the past three (3) years?

☐ Yes ☒ No

Explain: These violations were first discovered on 6/3/17.

b. Has the violation (*or closely related violation*) occurred within the facility's parent organization within the past three (3) years?

☐ Yes ☒ No

Explain: This question is not applicable to the ITM.

8.a. Did the violation result in serious environmental harm or risk to human health?

☐ Yes ☒ No

Explain:

b. Did the violation present an imminent and substantial endangerment to human health or the environment?

☐ Yes ☒ No

Explain:

c. Was the violation knowingly, intentional or reckless such that it may constitute criminal conduct?

☐ Yes ☒ No

Explain: The ITM is a nonprofit organization run by volunteers.

d. Was the violation inadvertent?

☒ Yes ☐ No

Explain:

e. Did the violation violate the specific terms of any judicial or administrative order?

☐ Yes ☒ No

Explain: This is not applicable.

9. Has the regulated entity cooperated and provided information to IDEM as necessary and requested, to determine applicability of the Policy?

☒ Yes ☐ No

Explain: The ITM is cooperating with IDEM and the City to rectify all violations.

Estimate of the cost of compliance: The estimates for the cost of compliance remain ongoing.

Basis of estimate: The estimates will be based on usual, customary and reasonable (UCR) charges associated with the environmental corrective measures outlined in Attachment A.

#### CERTIFICATION

I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify, based upon reasonable investigation, that the submitted information is true, accurate and complete to the best of my knowledge and belief.

John McNichols

Name (printed)



Signature

Chairman, ITM

Title

6/28/17

Date (month, day, year)

# Attachment A

## Self-Disclosure and Environmental Audit

Violation	Applicable Code(s)	Corrective Measure	Compliance Date
No Occupational Safety & Health Administration (OSHA) Hazard Communication Standard (HCS) for exposures to hazards within the facility	29 CFR 1910.1200 (OSHA HCS)	Develop a Health & Safety Plan (HASP) per OSHA's HCS, obtain safety data sheets (SDS), ensure all containers are properly labeled and develop BMPs for properly managing all incoming chemicals in the future, including labeling, identification and training protocols	9/26/17
Water discharged to the ground surface without a National Pollutant Discharge Elimination System (NPDES) permit	327 IAC 5-2-2 (NPDES)	Obtain an NPDES permit prior to any future discharges to the ground surface or a Publicly-Owned Treatment Works (POTW) facility	9/26/17
Stormwater discharges exposed to industrial activity without an approved plan	327 IAC 15-6-2 (Stormwater Discharges)	Develop a Stormwater Pollution Prevention Plan (SWP3)	9/26/17