

1204



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
INDUSTRIAL/HAZARDOUS WASTE
INSPECTION REPORT

Facility Name: <i>Bosch Automotive</i>	
EPA Identification Number: IND 984 874 628	
Location: 2721 West Kenwood Avenue	
City: South Bend	County: Saint Joseph
Zip Code: 46628	
Inspector: John Howard	Inspection Date: December 3, 2003
Other IDEM Representatives: None	
Primary contact during inspection: Mark Walker; Senior Leader Environmental, Health and Safety 574/237-5688	

A. Pre-Inspection File Review	
Notification Information:	Small Quantity Generator (SQG) on April 2, 1990
Part B Permitted Units/Issuance Date:	None
Part B Permit Reviewed by Inspector:	Date N/A
Interim Status Units:	None
Post Closure Units:	None
Waste Classification/Expiration Date:	N/A
Previous Inspections:	This is the first inspection done at this facility.
Unresolved violations/comments:	None

B. Inspection Findings	
I. Facility Description and Processes Inspected:	This facility does engineering, design and testing of automotive brake systems. The waste is a solvent used to clean parts that will be tested in the lab. The testing is for function and durability of the braking systems. They also generate used oil and scrap metal for recycling. No production is done at this facility, only lab operations. They employ approximately 300 people 5 days per week for 1 shift.
II. Regulatory Status/Activity:	SQG – Used Oil – Solid Waste

III. Hazardous and Universal Waste Streams Noted During Inspection			
EPA #/ Description	Source	Generation Rate	Disposition
D001;D018;/ Waste Flammable D035;F005/ Liquids N.O.S.	Cleaning of parts for inspection & testing	< 1/55/ month	SafetyKleen – ILD 980 613 913

IV. Exempted/Excluded Hazardous Waste Streams and Reason
(2) 5 gallon parts washers use Premium Gold 151 high flash solvent.

V. Transporters
Superior – Solid waste
SafetyKleen – TXR 000 050 930
SafetyKleen – SCR 000 075 150
Omni Source – Scrap metal

VI. Non-Hazardous Wastes Noted During Inspection			
Description	Source	Generation Rate	Disposition
Used oil	Hydraulics and brake fluid	~5/55/ month	SafetyKleen
Solid waste	Operations and office	25 yds. ³ / week	Prairie View LF

VII.	Container Management Area(s) (including Used Oil) Inspected					
<90(180) Day Accumulation Description of unit		<90(180) Day Accumulation Description of unit		<90(180) Day Accumulation Description of unit		
Location:	<u>Oil Storage Room</u>	Location:	<u>Engineering Garage</u>	Location:	<u>401 North Bendix Drive</u>	
Waste Code	#/Size of Containers	Waste code	#/Size of Containers	Waste Code	#/Size of Containers	
D001/D018/D035/ F005	1/55	Used Oil	1/55	Used Oil	1/55	

VIII.	Satellite Accumulation Area(s) Inspected/ Universal Waste Accumulation Area(s) Inspected		
Location	Waste Code(s)/Process	Comments	
Oil Storage Room	D001/D018/D035/ F005 – Parts clean up	Labeled & closed	

IX.	Hazardous Waste/Used Oil Tanks Inspected			
Waste Codes/Location	Type/Construction	Size	Quantity On-Site	
None				

X.	Other Regulated Unit(s) (i.e. Containment Building, Waste Piles, Restricted Waste Sites, etc.) Inspected			
Waste Codes/Location	Type/Construction	Size	Quantity On-Site	
None				

XI.	Relevant differences from previous inspections, and additional comments:
N/A	

XII.	Pollution Prevention (2) P2 opportunities may be available to help save money and reduce environmental risk/liability. You might consider having a P2 assessment, or a voluntary technical assistance consultation from IDEM staff or CMTI. Please visit the agency's P2 web site at www.in.gov/idem/oppta for additional information. The following are additional P2 suggestions that could possibly save money, reduce waste and/or minimize risk.
None	

XIII.	Guidance materials provided to facility:
None	

XIV.	Inspection Summary: (Description of facility walkthrough, observed permitted units, record review and post-interview)
<p>The inspection included the lab operations and engineering garage. The design and engineering sections were strictly office space with computers. The hazardous waste drums and used oil satellite was being stored in the garage inside a yellow fire cabinet for safety. They generate less than 1-55 gallon drum of waste solvent per month. The manifests backed that up.</p> <p>I also looked at 2002 and 2003 manifests and Land Disposal Restriction forms. (LDR) Everything was in order.</p>	

XV.	Permitted Facility:
Observed permitted units are consistent with permit requirements: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <u>XXXX</u> If no, see Section XVII, Violation Descriptions for details.	

XVI.	Violations. The checklist below is not comprehensive, but includes the most common violations. Additional violations may be cited in Section XVII, Violation Descriptions. Checked violations and additional violations are described in detail in Section XVII 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 XIV, Inspection Summary.		
	1) Hazardous Waste Determination 40 CFR 262.11	15) Maintenance & Operation 262.34 ref 265.31	29) Ignitable/Reactive Wastes 40 CFR 265.176/265.117
	2) Waste Storage 40 CFR 261.5(e), (f) or (g)	16) Communications & Fire (Req. Equip.) 262.34 ref 265.32	30) Inspections... Daily/Weekly (Tanks) 40 CFR 265.195
	3) Disposal/Mgt. CESQG 40 CFR 261.5 (f) or (g)	17) Testing & Maintenance (Equip.) 262.34 ref 265.33	31) Secondary Containment (Tanks) 40 CFR 265.193
	4) Generator EPA ID Number 40 CFR 262.12 & 329 IAC 3.1-1-10	18) Communication & Alarm (Access) 262.34 ref 265.34	32) SQG Tank Standards 40 CFR 265.201
	5) Manifest Requirements 329 IAC 3.1-7, 40 CFR 262.44	19) Aisle Space 262.34 ref 265.35	33) Integrity assessment (Tanks) 40 CFR 265.192

6) Land Disposal WAP 40 CFR 268.7		20) Police, Fire & Hospital Arrangements 262.34 ref 265.37		34) Subpart BB/CC 40 CFR 265.1050/1080	
7) Land Disposal Notification 40 CFR 268.7		21) Employee Training (SQG) 40 CFR 262.34 (d)		35) Mixing Used Oil (W/ Hazardous Waste) 329 IAC 3.1-3-1 & 2	
8) Land Disposal Certification 40 CFR 268.9		22) Response to Emergencies 40 CFR 262.34 (d)		36) Storage of Used Oil (Marking) IAC 13-4-3	
9) Closed HW container 0 CFR 262.34 ref 265.173		23) Annual/Biennial Report 40 CFR 262.44, IC 13-22-4-3.1		37) Release of Used Oil (response, report, repair) 329 IAC 13-4-3	
10) Container Marking & Labeling 40CFR 262.34 (c) (d) & 268.50		24) Contingency plan 262.34 ref 265.50		38) Release to the Environment (Env. Impact) IC 13-30-2	
11) Waste Storage (90/180 days) 40 CFR 262.34 (a), (d), (e) & (f)]		25) Emergency Coordinator 40 CFR 262.34 (d)		39) Solid Waste Mgmt 329-IAC-10	
12) Condition of containers 40 CFR 262.24 ref 265.171		26) Personnel training (LQG) 262.34 ref 265.16		40) Permit Conditions 40 CFR 264	
13) Satellite Accumulation 40 CFR 262.34 (c)		27) Labeling/Marking (Universal Waste) 329 IAC 3.1-16		41) Other (See violation descriptions)	
14) Emergency Info Posted 40 CFR 262.34 (d)		28) Storage Time (Universal Waste) 329 IAC 3.1-16			

XVII.	Violation descriptions: Includes observed violations with corresponding regulatory citations and permit conditions (when applicable), corrective measures and compliance dates.
--------------	--

The facility was in compliance at the time of the inspection. (FIC)

ATTACHMENTS:

XXX FACILITY MAP WITH LOCATION OF REGULATED WASTE ACTIVITY AND AREAS OF ENVIRONMENTAL CONCERN

_____ PHOTO LOG

_____ ADDITIONAL DOCUMENTATION

_____ NO ATTACHMENTS

**Indiana Department of Environmental Management
VERIFICATION OF INSPECTION**

This is to verify that on 12/3/2003 an inspection of Bosch Automotive was conducted by the undersigned representative of the Indiana Department of Environmental Management, Office of Land Quality.

Type of Inspection (may include more than one):

CEI

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

Preliminary Inspection/Screening Findings

*These findings are considered preliminary and include specific matters discovered during the inspection that the designated agent of the department believes may be a violation of law or a permit issued by the department.

Single Media Inspection:

- No violations were discovered with respect to the particular items observed during the inspection.
 Potential violations were discovered but corrected during the inspection.
 Potential violations were discovered and require a submittal and/or follow-up inspection.
 Potential violations were discovered and may be referred to our Office of Enforcement.
 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.
 Potential problems or potential violations were discovered but corrected during the inspection.
 Potential problems or potential violations were discovered and will be referred to the Office(s) of _____ for further investigation and response.

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 less environmental wastes are generated. Your participation in Indiana's pollution prevention program is entirely voluntary. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? Yes No

If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance at 317/233-5627 or 1-800/988-7901 or visit their Web site at <http://www.IN.gov/idem/oppta/p2/>.

A summary of violations and concerns noted during the inspection were verbally communicated to the undersigned representative during the inspection. The facility should correct any deficiencies noted as soon as possible. Corrections made and verified during the inspection may still be cited as violations.

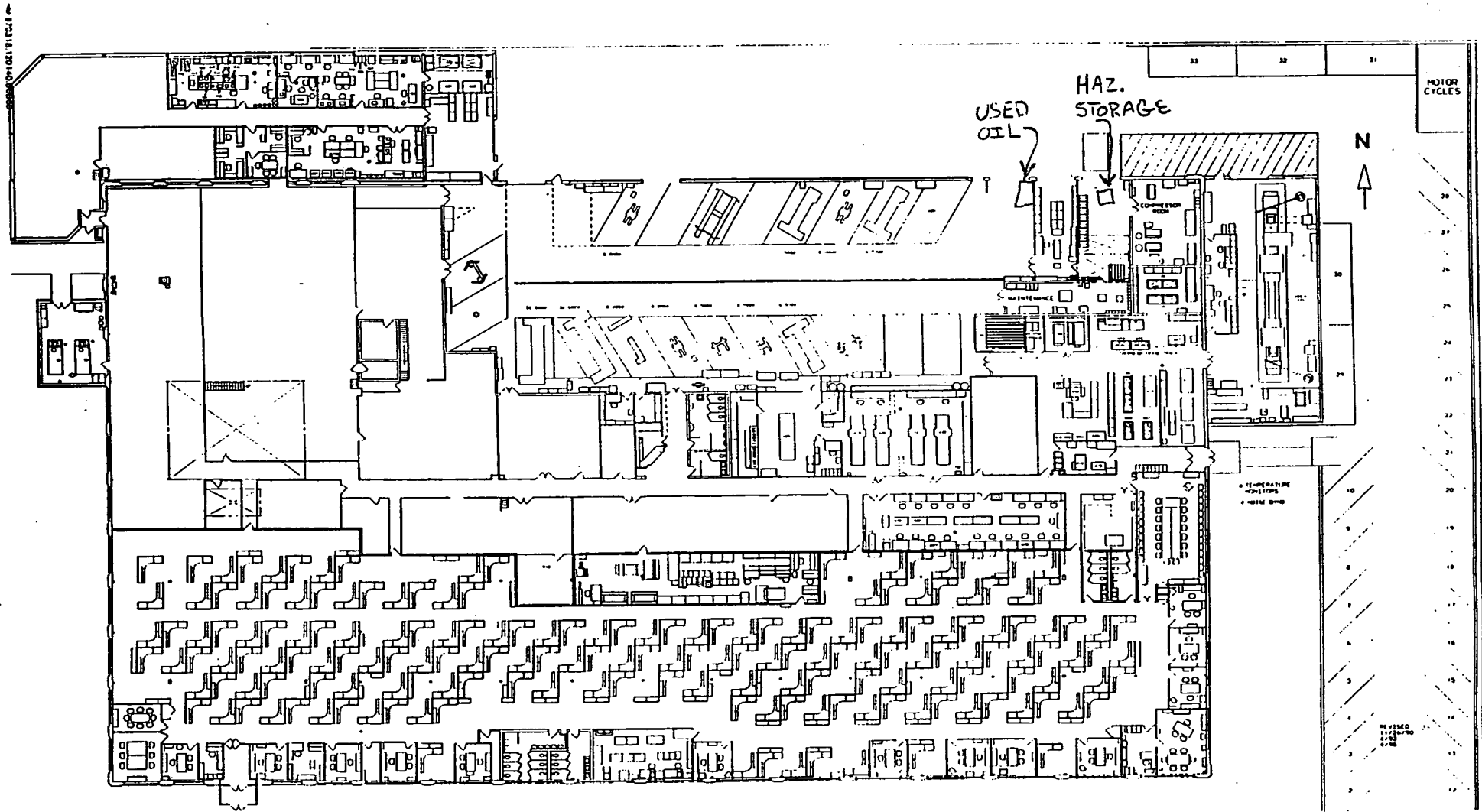
- Written inspection summary will be provided within 45 days. Written report provided at the conclusion of the inspection.

IDEM Representative:

Printed Name	Signature	Phone Number	Date	Time
John Howard	<i>John Howard</i>	574/ 245-4890	12/3/2003	In: Out:

Owner/Agent Representative:

Printed Name	Signature	Title	Phone Number	Date
Mark Walker	<i>Mark Walker</i>	Sr. Leader Health Safety Envir.	574 237 5688	12/3/03



Bosch Automotive
2721 West Kenwood Avenue
South Bend, Indiana 46628



12/19

131

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

December 19, 2003

Northern Regional Office
220 West Colfax Ave., Suite 200
South Bend, Indiana 46601-1634
(574) 245-4870
(800) 753-5519 Toll Free
(574) 245-4877 Fax
www.IN.gov/idem

Mr. Mark Walker
Bosch Automotive
401 North Bendix Drive
South Bend, Indiana 46628

Re: Inspection Summary Letter
Bosch Automotive
IND 984 874 628
South Bend, Saint Joseph County

Dear Mr. Walker:

On December 3, 2003, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Bosch Automotive, located at 2721 West Kenwood Avenue; South Bend, 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: XX Complete Industrial Waste Inspection
_____ Limited Industrial Waste Inspection
_____ Complaint
_____ Other _____

Results of Inspection: XX No violations were observed
_____ Violations were observed but corrected during the inspection. See inspection report.
_____ Violations were observed. See inspection report.
_____ Additional information/review is required to evaluate overall compliance.
_____ Violations were observed and will be referred to the Office of Enforcement. See inspection report.

Please direct any response to this letter and any questions to me at 574/245-7890.

Sincerely,
John Howard
John Howard
Industrial Waste Compliance Section
Northern Regional Office

Enclosure
cc: Saint Joseph County Health Department