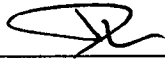




**INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT
INDUSTRIAL/HAZARDOUS WASTE INSPECTION REPORT**

Please type/Print Facility Name:	Bosch Automotive		
Location:	401 North Bendix Drive		
City: South Bend	County: St. Joseph	Zip: 46628	
Inspector's Name:	John Howard		
EPA Hazardous Waste I.D. #	Date(s)	Time	
INR 000 102 004	December 13, 2001	10:30 A.M.	

A. PRE-INSPECTION REVIEW

I.	File Review			
Notification Date:	April 10, 2001			
Notification Activities:	SQG			
Has a Part B Permit Been Issued?	Yes/No	No	Permit Expiration Date:	N/A
Permitted Units:	None			
Interim Status Units:	None			
Post Closure Units:	None			
Waste Classifications?	Yes/No	No	Expiration Date: N/A	

II.	Compliance History			
Previous Inspection Date: First inspection done at this site.	Complete		Focused	
	Follow-up		Complaint	
List Unresolved Violations:	None			
Comments:	Contact:: Mark Walker; Environmental Health & Safety Manager Phone: 219/237-5688			

B. INSPECTION FINDINGS

I. Type and Size of Operation, Products, Processes That Produce Waste (hazardous or non-hazardous).

This operation employs approximately 175 people 5 days a week for 8+ hours per day. No manufacturing is done at this facility. It is used for corporate administration and engineering. Wastes generated are used oil, IPA and solvents used in testing procedures.

II. Regulatory Status/Activity for Hazardous and Industrial Waste (Based on Inspection)

SQG
Used Oil Regulations
Universal Waste

III. Hazardous Waste Streams (including Universal Waste)

EPA #/Description	Sources/Process	Generation Rate	Disposition
D009/Lamps & Ballasts	Maintenance	Varies	Superior Special Services
F005; D001; D018; D035/ Spent Solvent	Lab QA/QC and checks	~ 80 gallons/ month	Safety-Kleen - ILD 980 613 913
D008/ Automotive batteries	Maintenance	< 12/ year	NAPA
ONE TIME PROJECT:			
D008/ Lead paint	Demolition	14/55	Chem Waste - ALD 000 622 464
PCB equipment	Demolition	2400 pounds	Chem Waste
Asbestos	Demolition	1500 linear feet	Chem Waste

IV.	Exempted/Excluded Hazardous Waste Streams or Units and Reason for Exemption		
Universal waste for lamps and batteries			
V.	Transporter(s) Used (Include both Industrial and Hazardous Waste Transporters)		
Safety-Kleen - SCR 000 075 150 Waste Management - Solid Waste OmniSource - Scrap Metal Fisher Industrial Services - ALD 981 020 894			
VI.	Non-Hazardous Waste / Industrial Waste / Used Oil		
Description	Source/Process	Generation Rate	Disposition
Used Oil	QA/QC	5/55 per month	Safety-Kleen - IND 000 715 474
Aqueous parts washer	Maintenance	~ 40 gallons/ month	Safety-Kleen - IND 000 715 474
Scrap Metal	Scrap	~ 40 cubic yards/ quarter	OmniSource - Goshen
Solid Waste	Refuse	3000 cubic yards/ year	Prairie View RDF
Cardboard	Packages	16 cubic yards/ week	Waste Management

VII. Container Management Area(s) (including Used Oil)					
<90(180) Day Accumulation Description of unit		<90(180) Day Accumulation Description of Unit		<90(180) Day Accumulation Description of unit	
Location: Drum storage area Bldg. 103		Location:		Location:	
Waste Code	#/Size of Containers	Waste code	#/Size of Containers	Waste Code	#/Size of Containers
F005; D001; D018; D035	3/55				
Used oil	10/55				

VIII. Satellite Accumulation Area(s) / Universal Waste Accumulation Area(s)		
Location	Waste Code(s)/Process	Comments
Building 104	F005; D001; D018; D035/ Cleaning solvents	Closed and labeled
NVH Lab	F005; D001; D018; D035/ Cleaning solvents	Closed and labeled. Moved closer to operator control.

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

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

XI.	Company is subject to the following regulations	
Note:	The Indiana Hazardous Waste Rule, 329 IAC 3.1, incorporates by reference federal standards, which have been published in the Code of Federal Regulations as 40 CFR. Hazardous Waste citations reference the federal rules as incorporated, except where the State rule substitutes full text language, in which case the specific 329 IAC 3.1 citation will be used. If the facility has been issued a permit, specific permit conditions may be cited.	
	<input type="checkbox"/>	40 CFR 261.5 / 329 IAC 3.1-6 Conditionally Exempt Generator
	<input checked="" type="checkbox"/>	40 CFR 262 / 329 IAC 3.1-7 Generator Standards
	<input type="checkbox"/>	40 CFR Part 263 / 329 IAC 3.1-8 Transporter Standards
	<input type="checkbox"/>	40 CFR Part 264/265 / 329 IAC 3.1-9 & 10 Facility Standards
	<input checked="" type="checkbox"/>	40 CFR Subpart I Container Standards
	<input type="checkbox"/>	40 CFR Subpart J Tank Standards
	<input type="checkbox"/>	40 CFR Subpart AA Air Emission – Process Vent
	<input type="checkbox"/>	40 CFR Subpart BB Air Emission – Equipment Leaks
	<input type="checkbox"/>	40 CFR Subpart CC Air Emission – Tanks, Surface Impoundments & Containers
	<input type="checkbox"/>	Other (specify):
	<input type="checkbox"/>	40 CFR Part 266 / 329 IAC 1-11 (specify):
	<input checked="" type="checkbox"/>	40 CFR Part 273 / 329 IAC 3.1-16 & Universal Waste
	<input checked="" type="checkbox"/>	329 IAC 13 Used Oil Management
	<input type="checkbox"/>	327 IAC 2-10 Secondary Containment Rule
	<input type="checkbox"/>	329 IAC 9 Underground Storage Tank Rule
	<input type="checkbox"/>	IC 13-20-7.5 Industrial Waste Law
	<input type="checkbox"/>	Other (specify):
XII.	Additional Comments (Include Non-Program Violations) Include information regarding how the company is complying with the notification requirement of IC 13-20-7.5 for Industrial Waste.	
Solid waste is going to a Subtitle D landfill.		
Ensure "Universal Waste" is stored labeled in a secure area.		
XIII.	Please list guidance materials provided to facility:	
Labels		

XIV.	Narrative / Description of Violations	
Facility Name: Bosch Automotive	ID#: INR 000 102 004	
Address: 401 North Bendix Drive	Inspection Date: December 13, 2001	
The Indiana Hazardous Waste Rules, 329 IAC 3.1, incorporates by reference federal standards, which have been published in the Code of Federal Regulations as 40 CFR 260 through 40 CFR 270. Citations reference the federal rules as incorporated, except where the State rule substitutes full text language, in which case the specific 329 IAC 3.1 citation will be used. If the facility has been issued a permit, specific permit conditions may be cited.		
Regulatory Citation	Violation Observed/Suggested Correction and Compliance Date	
329IAC 13-4-3 Action: Status:	Containers and tanks used to store used oil must be clearly labeled or marked with the words "Used Oil" Label the the following containers of used oil with the words "Used Oil". a.) 10/55 gallon drums located in Drum Storage Area In compliance: Containers were labeled at the time of the inspection	
40CFR 262.34(a)(2) Action: Status:	Facilities must store hazardous waste containers with the start of the accumulation date labeled on the containers. Label the following drum with the accumulation start date. a) 1/55 gallon container of F005/D001/D018/D035 @ Drum Storage Area In compliance; A date was taken care of by the facility and the violation was corrected at the time of the inspection.	
40CFR 262.34(c)(1) Action: Status:	A generator may accumulate as much as 55 gallons of hazardous waste or 1 quart of acutely hazardous waste listed in 261.33(e) in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status. Locate the satellite container in the NVH Lab area closer to the operations personel in the lab. In compliance: Drum was located by the overhead door in the entrance to the lab.	

**** ATTACH FACILITY MAP WITH LOCATION OF HAZARDOUS WASTE ACTIVITY INDICATED**

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

This is to verify that on December 13, 2001 an inspection of Bosch Automotive was conducted by the undersigned representative of the Indiana Department of Environmental Management, Office of Land Qual

Type of Inspection:

- Complete Industrial/Hazardous Waste Inspection
 Limited Industrial/Hazardous Waste Inspection
 Industrial Waste Landfill Inspection
 Complaint
 Multi-Media Screening Evaluation
 Other _____

Inspection Findings:

- In compliance, no violations observed.
 In compliance, violations were observed but corrected during the inspection. See inspection report.
 Violations were observed and require a submittal and/or follow-up inspection. See inspection report.
 Violations were observed and are being referred to our Office of Enforcement. See inspection report.
 Additional information/review is required to evaluate overall compliance.
 Other _____

Multi-Media Screening Checklist Finding:

- No potential problems or areas of possible non-compliance were observed and noted on the multi-media screening checklist.
 Potential problems or areas of possible non-compliance were observed and noted on the multi-media screening checklist, corrected during the inspection. Refer to the final single-media inspection report and multi-media screening checklist.
 Potential problems or areas of possible non-compliance were observed and noted on the multi-media screening checklist, will be referred to the Office(s) of _____ for further investigation and response. Refer to the final single-media inspection report and multi-media screening checklist.
 If non-compliance is determined or additional information/review is required to evaluate overall compliance, the Office of _____ will be the lead IDEM Office(s) in pursuing these matters.

Pollution Prevention:

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote change 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

A summary of violations and concerns noted during the inspection were verbally communicated to the undersigned company representative during the inspection. The company is encouraged to correct any deficiencies noted as soon as possible. Corrections made and verified during the inspection may still be cited as violations; however, prompt action may be taken into consideration in determining the resolution to any enforcement action, which may be taken.

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

IDEM Representative:

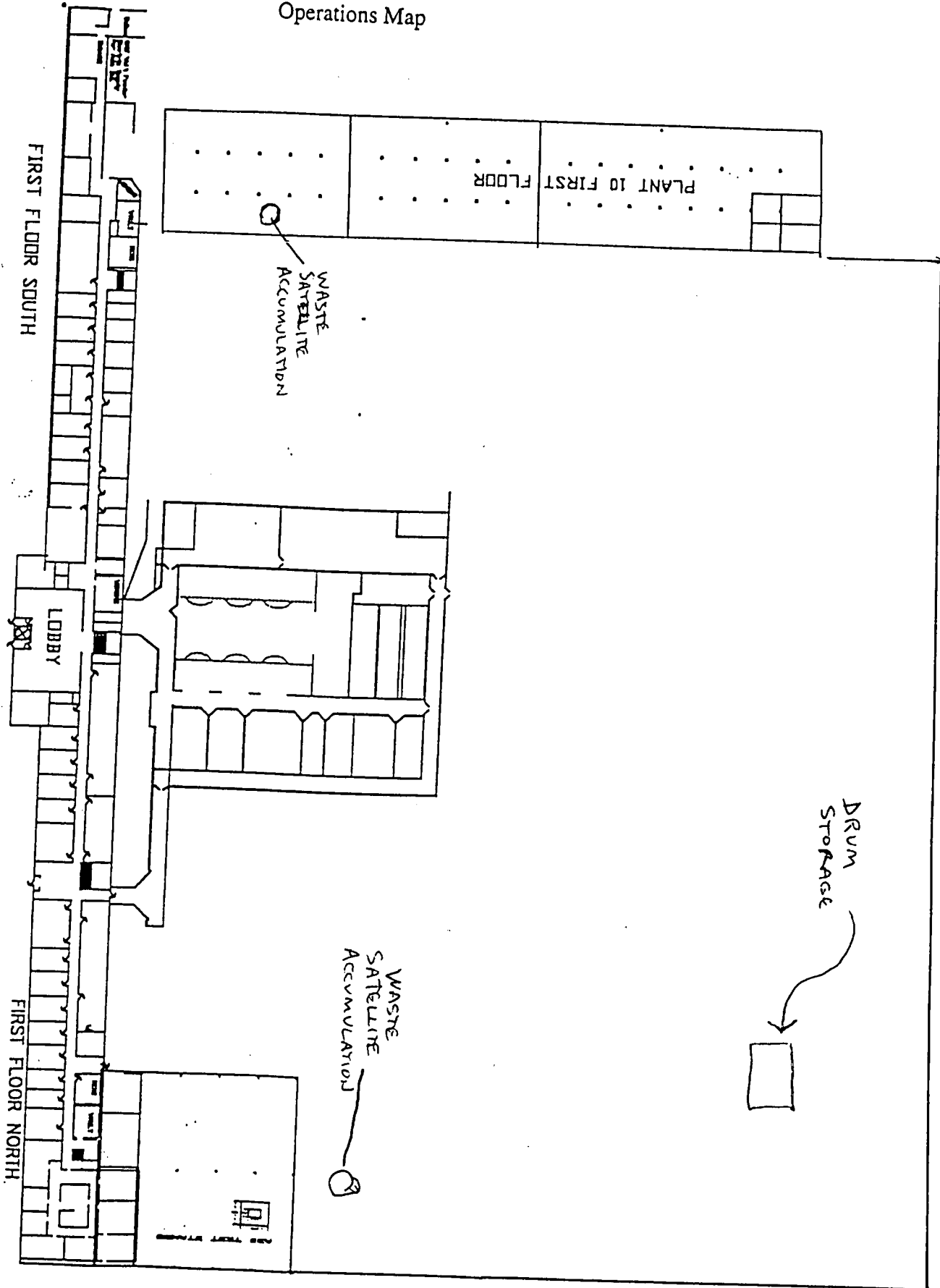
Printed Name	Signature	Phone Number	Date
John Howard	<i>John Howard</i>	219/245-4890	12/13/2001

Company Representative:

Printed Name	Signature	Phone Number	Date
MARK WALKER	<i>Mark Walker</i>	219/237-5688	12/13/2001
Street/PO Box	City, State, Zip	Ownership	Fax Number
401 N. BENDIX	SOUTH BEND, IN 46628	Private	219 237 5628

- 1) A **Complete Industrial/Hazardous Waste Inspection** evaluates a company's compliance with all applicable waste related rules and statutes. These include hazardous waste management requirements in the Resource Conservation and Recovery Act (RCRA), 40 CFR 260 - 279, Hazardous Waste Management Regulations, 329 IAC 3.1, Solid Waste Regulations, 329 IAC 10, 11, and 12, Used Oil Management, 329 IAC 13, Industrial Waste Statute, IC 13-20-7.5, and the Environmental Management Act, IC 13.
- 2) A **Limited Industrial/Hazardous Waste Inspection** evaluates a company's compliance in a specific area applicable waste related rules and statutes (for specific rules and statutes see definition of a **Complete Industrial/Hazardous Waste Inspection**). This is sometimes referred to as a "focused" inspection. An inspection may be limited to a single rule or requirement of a rule or statute. Compliance with rules or statutes not evaluated is not implied. The inspection report will identify the extent of the inspection and the compliance status.
- 3) An **Industrial Waste Landfill Inspection** evaluates a landfill's compliance with all applicable rules and statutes regarding the handling and disposal of Industrial waste.
- 4) A **Complaint Investigation** is in response to information received from the public, other agency, or internal agency referral. This inspection generally focuses on the allegation of non-compliance with waste related rules and statutes. The scope of the inspection may be expanded to a Complete Industrial Waste Inspection depending on the finding.
- 5) A **Multi-Media Screening Evaluation** is generally a complete or limited inspection in one program media (e.g., air, industrial waste, wastewater, drinking water) plus a screening evaluation in one or more other media. This multi-media screening evaluation includes the completion of a multi-media screening checklist. The screening evaluation is intended to identify the obvious and readily detectable instances of non-compliance or indicators of possible non-compliance in other compliance program areas.

Attachment C
Operations Map





INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

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Hq

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

Northern Regional Office
220 West Colfax Avenue, Suite 200
South Bend, Indiana 46601-1634
(219) 245-4870
(800) 753-5519 Toll Free
(219) 245-4877 Fax
(800) 451-6027 EnviroLine
www.state.in.us/idem

December 18, 2001

VIA CERTIFIED MAIL 7001 0320 0004 3891 1694

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

Dear Mr. Walker:

Re: Inspection Results
Industrial Waste Management
Compliance Evaluation
Bosch Automotive
EPA I.D. No. INR 000 102 004
South Bend, St. Joseph County

Representatives of the Department of Environmental Management (Department) are conducting inspections of facilities in Indiana that are engaged in the generation, transportation, treatment, storage, or disposal of industrial waste. Facilities are being inspected to determine compliance with, but not limited to, "Environmental Management Act"; IC 13, "Indiana Administrative Code"; 329 IAC 3.1, "Hazardous Waste Management Permit Program and Related Hazardous Waste Management Requirements"; 329 IAC 3.1, "Solid Waste Land Disposal Facilities"; 329 IAC 10, 11 and 12, "Used Oil Management"; 329 IAC 13, and rules promulgated pursuant to those statutes. These inspections and record reviews are also being conducted pursuant to the requirements of the Resource Conservation and Recovery Act (RCRA), Public Law 94-580, as amended, for authorized state hazardous waste management programs.

This is to inform you that on December 13, 2001, I conducted an inspection of Bosch Automotive, located at 401 North Bendix Drive. You represented your firm. For your information, a summary of the inspection report is provided below:

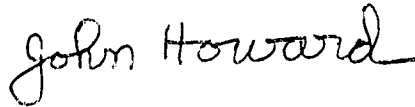
- Type of Inspection:
- Complete Industrial Waste Inspection
 - Limited Industrial Waste Inspection
 - Special Waste Landfill Inspection
 - Complaint
 - Other: _____

Bosch Automotive
Inspection Results
Page 2

- Results of Inspection:
- Additional information is required to evaluate overall compliance before you will receive a completed report.
 - In compliance, no violations observed.
 - In compliance, violations were observed but were corrected during the inspection. See inspection report.
 - Violations were observed and require a follow-up inspection. See inspection report. Re-inspection will be conducted after _____.
 - Violations were observed and require a submittal. See inspection report. Submittal is due _____.
 - Violations were observed and are being referred to our Office of Enforcement. See inspection report.

Please direct any response to this letter and any questions to me at 219/245-4890.

Sincerely,



John Howard
Environmental Manager II
Office of Land Quality - Hazardous Waste Section

Enclosure

cc: St. Joseph County Health Department