

DATE OF INSPECTION	Date of receipt of NOV if applicable	Entity	LOCATION	ID Number	AGENCY INVOLVED	NOV/CITATION ISSUED?	VIOLATIONS CITED	ACTION TAKEN	CONSENT ORDER/AGREED ORDER	PROPOSED PENALTY	PENALTY PAID	DATE PENALTY PAID	STATUS	Attach NOV	
Mar-20	Apr-20	TTR	East Chicago		IDEM (CEI)	Yes	<ul style="list-style-type: none">UW container integrityImproper UW labelingOpen and unlabeled satellite container - 5 gal pail, tank farm<ul style="list-style-type: none">Records provisionsDrum dated >365 days.Container integrityOpen containers - 2Insufficient idle space<ul style="list-style-type: none">Liquids staged for >12 hrs outside containmentLiquids not placed into containment within 72 hours from receiptSolid Waste not accepted w/in 72 hours.Insufficient incompatible segregation.Secondary containment condition.Used Oil conflicting container labeling.5 gal pail without confirmation tracking label.Unstable Stacking.	<ul style="list-style-type: none">Used lamps were repackaged.Used lamps were labeled and loaded for shipmentPail was removed and transferred to bulk tank.300+ pages of requested records were provided as Corona virus reduced staffing allowed.Drum was not received by TTR, EC on 3/19 but rather a sister facility. Container has since been shipped and was not present for >365 days.Dented Containers were processed.Containers sealed during inspection.Idle space corrected during inspection.Liquids moved to containment area.Containers identified and paint filter test performed. Liquids moved to containment.Containers were labeled as received date of inspection.Containers opened and tertiary containment verified. Containers still in Transportation DOT compliant.Repairs conducted as weather allows, ice, snow, rain cannot exist while repairs are made.Container verified as "Used Oil".5 gal pail labeled.Unstable stacking fixed at time of inspection.	Pending	Pending		Open	IDEM 2020 RCRA Inspection/IDEM Inspection Report 82943189.pdf		
Jan-20	NA	TTR	East Chicago		FRA-DOT	NO	NA	NA	NA	NA	NA	NA	Closed		
Oct-19	Oct-19	TTR	East Chicago		IDEM, Solid Waste	No	NA	NA	No	NA	NA	NA	Closed		
Jul-19	Jul-19	TTR	East Chicago		IDEM, Solid Waste	Yes	1) Inventory records not provided on date of inspection 2) Late submission of financial responsibility.	1) Inventory records provided next day 2) Closure cost submitted 7/31/19.	NA	NA			Closed	N:\Compliance\Environmental\East Chicago\Agency Inspection\IDEM EPA\2019\SW 7-22-19\45- HW - Tradebe Treatment and Recycling - INDO00646943 - ALID 11560 - 7-22-19 - Alan El.pdf	
Oct-19	Oct-19	TTR	East Chicago		IDEM (CEI)	Yes	<ul style="list-style-type: none">container integrity - 2 containersOpen containers - ripped/blown-off tarps from wind.Container inspection records missing.Missing railcar entry date to plant on 2 of 8 railcars.Missing HW label on 1 railcar.Failure to minimize potential HW release.	<ul style="list-style-type: none">Containers emptied and properly disposed of.Tarps replaced at time of inspectionRecords from daily inspections provided.Railcars labeled and dated same day of inspection.Roll-Off box area cleaned same day following inspection.Plant sweeper aquired.	Pending				Open	N:\Compliance\Environmental\East Chicago\Agency Inspection\IDEM EPA\2019\Sept 10 10Q\45 - HW - Tradebe Treatment and Recycling LLC - INDO00646943 - 10-7-19.pdf	
Jun-19	Jul-19	TTR	East Chicago		IDEM (CEI)	Yes	<ul style="list-style-type: none">heel manifests not signedUsed Oil Wap not provided day of inspection2 pallet overhangs.container integritySecondary containment coating damagecompatibility storage.(1) open CYB(6) quarantined containers w/o missing labels.	<ul style="list-style-type: none">Manifest signed same daycopy of WAP provided next dayoverhangs corrected same day.drums processed next daycoating repairedmaterial moved for permit required seperation distance.CYB closed during inspectionContainers researched with brokers and generators and labeled.	Yes	\$13,812.50	Open	Open	N:\Compliance\Environmental\East Chicago\Agency Inspection\IDEM EPA\2019\June 18 2019 RCRA General 4545 - HW - Tradebe Treatment and Recycling LLC - INDO00646943 - 6-18-19.pdf		

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Jun-19	Aug-19	TTR	Millington	TND 00-77-2186	TDEC	Yes	<ul style="list-style-type: none"> Time of inspection was not denoted on daily inspection log Two 5-gallon buckets labelled "dangerous when wet" was stored improperly Containers stored in 203 containing a total of 14,792 gallons exceeding the permitted capacity Time of inspection was not denoted on daily inspection log Two 5-gallon buckets labelled "dangerous when wet" was stored improperly Containers stored in 203 containing a total of 14,792 gallons exceeding the permitted capacity Containers stored in 207 containing a total of 8,225 gallons exceeding the permitted capacity Contingency plan had not been updated for changes in personnel 5-day inbound/outbound storage logs do not show all trailers onsite In Unit 204 A-Bay Row 4, the DSWM observed one 55-gallon drum that was not closed Facility personnel closed this container during the CEI In Unit 207 Area D Row 3, the DSWM observed a shrink-wrapped pallet of bags of hazardous waste in which the top bag was torn and open and DSWM observed a cubic yard box that was open. In Unit 207 Area A, the DSWM observed a 	<ul style="list-style-type: none"> The employee that conducted the inspections that TDEC identified as missing times but having the correct dates, no longer is employed by Tradebe and although we reached out to them no reply has been received. Typical inspection times were conducted in the morning. The two containers referenced in this observation were moved to water reactive storage A scan and piece count was conducted on September 11, 2019. Volume from the scan was 2,505 gallons. A single roll-off (volume of 6,059 gallons) replaced the containers The Contingency Plan has been update along with the a copy of the additional information for a class 1 permit modification Update 5 day inbound/outbound daily and added M-load logs to 5 day spreadsheet corrected during inspection Corrected during inspection Corrected during inspection Corrected during inspection Corrected during inspection Corrected during inspection 	No	28644.64	28466.64	3/20/2020	Closed		
Jun-19	Jun-19		East Chicago		IDEM (CEI)		<ol style="list-style-type: none"> Area 3 had six (6) container condition issues, dented drums, and over pressurized drums. Area 11 observed three (3) containers with leaks. 1 box, 2 drums. Corrective Action at time of inspection. IDEM identified a repeat violation of improper segregation of incompatible waste. Area 6 had rows of flammables and oxidizers located next to a common containment trench. IDEM identified liquids outside of secondary containment. Two (2) liquid drums were in the Q (quarantine) area not equipped with secondary containment. Area 2 and Area 6 had floor coating damage needing repairs Area 2 had been identified in the inspections 	<ol style="list-style-type: none"> Corrective Action at time of inspection: Some removed and placed in line for processing during inspection, remainder being moved for processing. All moved to processing during the inspection. Corrective Action at time of inspections, all flammables moved to racks during inspection. Two liquid drum were remove immediately. (Work order) we have until June 28 to repair 	2019-26107-H AO				Open		
May-19	NA	TTR	East Chicago		IDEM (Air)	No	NA	NA	NA	NA	NA	NA	NA		
Apr-19	NA	TTR	East Chicago		IDEM, Solid Waste	No	N/A	NA	NA	NA			Closed		
Mar-19		TTR	East Chicago		IDEM (CEI)	Yes	<ul style="list-style-type: none"> (2) missing FE (1) pallet unstable stacking Indoor consolidation storage containers not elevated. Indoor labpack booth staging double stacked Drum and 5 gal in receiving cavitated & missing labels Disallowed satellite storage area for consolidation, containers beyond 365 days. 	<ul style="list-style-type: none"> Replaced same day Pallet fixed during inspection Containers elevated with chemical resistant pallets. Top containers removed Containers over packed and labeled Containers beyond 365 days shipped for disposal. 	Pending				Open	NOV	
Jan-19		TTR	East Chicago		IDEM, Solid Waste	No	N/A	NA	NA	NA			Closed		
Jan-19		TTR	East Chicago		FRA-DOT	No	NA	NA	NA	NA			Closed		
Dec-18		TTR	East Chicago		IDEM (CEI)	Yes	<ul style="list-style-type: none"> Open hazardous waste containers (roll-offs) Unlabeled, undated hazardous waste containers 	<ul style="list-style-type: none"> Roll-offs tarped at time of inspection. Corrected at time of inspection. All totes related to active maintenance project labeled and dated same day. 	NA	N/A	None	None	Closed	Nov	
Oct-18		TTR	East Chicago		IDEM (CEI)	Yes	Container management; Container condition; Container staging for shipping; Over capacity for three container storage areas; Missing construction notification letter for additional storage Areas; Incompatible material on common pallet	Containers identified were either overpacked or processed; Idle space was adjusted to accommodate access; Additional operating hours were mandated for production for inventory management; All unstable stacking was corrected at the time of inspection; Incompatible materials were resorted to segregated pallets	Pending				Open	Nov	
Oct-18		TTR	East Chicago		IDEM, Solid Waste	No	N/A	NA	No	NA	N/A	None	Closed		
Sep-18		TTR	East Chicago		USEPA, Reg 5 Air	No	N/A	NA	No	NA	N/A	None	Closed		
Aug-18		TTR	East Chicago		IDEM Solid Waste	No	NA	NA	No	NA	NA	None	Closed		
Jun-18		TTR	East Chicago		IDEM Solid Waste	No	NA	NA	No	No	None		Closed		
Jun-18		TTR	East Chicago		IDEM (CEI)		Failure to submit an unmanifested waste report and manifest discrepancy report to the Regional Administrator; In adequate personnel training for waste management handling procedures; Potential mixing of incompatible materials	Upon recognition of third party response errors Tradebe prepared manifests for returned shipments to its facility; Tradebe performed additional training through toolbox training events for receiving personnel and security personnel. Review with approvals IDEM ascertainment of incompatibles and toolbox covering inspection and events.	Pending				Open	Nov	
May-18		TTR	East Chicago		DOT	No	NA	NA					Closed		

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Mar-18		TTR	East Chicago		IDEM (CEI)	Yes	• Hazardous Waste Roll-off boxes not dated	Dated during inspection	No	No	None	None	Closed		
Mar-18		TTR	Millington	RCRA Part B	TDEC	Yes	- 1 drum staged for pumping open - 2 missing tags for BB/CC - missing tag IDs on BB log	Corrected at time of inspection	No	NA	NA	None	Open		
Jan-18		TTR	East Chicago	none	FRA-DOT	No	NA	NA	No	No	None	N/A	Closed		
Dec-17		TTR	East Chicago		IDEM Solid Waste	No	NA	NA	No	No	None	N/A	Closed		
Dec-17		TTR	Millington	none	SCHD	No	None	NA	NA	NA	NA	NA	Open		
Dec-17		TTR	East Chicago	VL 2018-25023-H	IDEM (CEI)	Yes	<ul style="list-style-type: none"> • tank inspection and corrective actions • tank thickness requirements • No test records for monthly high level tank controls • Inadequate inspection and calibration records for temp, press, pH, etc on tank systems • Containment coating repair schedule • Containment system cracks • visible liquid and solids in truck dock/containment area sump 	<ul style="list-style-type: none"> • tank painting completed • tank thickness measurements completed by third party • Testing mode demonstrated and recorded • All required temp and pressure gauges calibrated or replaced • Containment coating repair completed as weather allowed • Containment cracks sealed as temps allowed • Sump wet to touch no free liquid pumpable although tried. 	No	No	None	N/A	Closed		
Nov-17		TTR	East Chicago		EC Sanitary District	No	N/A	N/A	N/A	N/A	N/A	N/A	Closed		
Sep-17		TTR	East Chicago		IDEM (CEI)	Yes	<ul style="list-style-type: none"> • LQG 90-day Storage • Container Storage – Bulging and Leaking Container • Container Movement – Staging >12 hours • Container Management Practices – Incompatible Wastes 	All items identified were addressed on day of inspection.	No	N/A	N/A	N/A	Closed		
Jul-17		TTR	East Chicago		IDEM (CEI)	No	• Container Management Practices	• Revision to practices for Incomputables	No	N/A	N/A		Closed		
Jun-17		TTR	East Chicago		IDEM Solid Waste	No	• No Violations Observed	N/A	No	N/A	N/A		Closed		
Jun-17		TTR	East Chicago		IDEM (CEI)	No	• Container Management Practices	• Containers moved to permitted storage	No	N/A	N/A		Closed		
Jun-17		TTR	East Chicago		IDEM (Air)	No	• No Violations Observed	N/A	No	N/A	N/A		Closed		
Apr-17		TTR	East Chicago		IDEM (Air)	No	• No Violations Observed	N/A	No	N/A	N/A		Closed		
Apr-17		TTR	East Chicago		IDEM (CEI)	Yes	• Personnel training	<ul style="list-style-type: none"> • Re-training of expired employees • Internal audit of existing employees training 	No	N/A	N/A		Closed		
Mar-17		TTR	Millington	RCRA Part B	TDEC	Yes	<ul style="list-style-type: none"> - 1 yd3 sack not secure on pallet - Faded painted lines marking storage are 217 - Unit 202 (1) dented plastic drum and (1) yd3 cardboard box damaged. - Unit 202 one isle not separated by 24" (18" observed) - Unit 207 overcapacity of storage area - Faded painted lines Unit 207C - Missing LDAR Tags in Unit 208 - Late notification of commencing construction on new Unit 212. 	Corrected at time of inspection	Draft	TBD	70,425	Closed	Closed		
Feb-17		TTR	East Chicago		DOT-FRA	Yes	• Non-tool tight fittings	• Third party function specific training	Yes	\$5,000	\$3,250		Closed		
Jan-17		TTR	East Chicago		DOT-FRA	No	• No Violations Observed	N/A	No	N/A	N/A		Closed		
Jan-17		TTR	East Chicago		DOT-FRA	Yes	• Offered overweight rail car for transport	• Increased tracking of volume/weight being loaded into rail cars prior to transport	Yes	\$5,000	\$3,000		Closed		
Dec-16		TTR	East Chicago		IDEM (CEI)	Yes	<ul style="list-style-type: none"> • Condition of containers • Container staging • Container acceptance • Container management practices • Stacking conditions 	<ul style="list-style-type: none"> • Re-inforcement of regulatory requirements with Receiving Dept. • Inbound containers being grouped based on time of receipt • Operators retrained on proper segregation of hazardous waste 	Yes	\$3,438	\$3,438		Closed	Nov	CO
Nov-16		TTR	East Chicago		IDEM Solid Waste	No	• No Violations Observed	N/A		N/A	N/A		Closed		
Nov-16		TTR	East Chicago		IOSHA	Yes	• 110 volt powerstrip secured to wall using adhesive tape	• Powerstrip removed and electrical improvements made to lab	Yes	\$1,478.75	\$1,478.75		Closed		
Oct-16		TTR	East Chicago		East Chicago Sanitary District	No	• No Violations Observed	N/A	No	N/A	N/A		Closed		

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Sep-16		TTR	East Chicago		IDEM (CEI)	No	• No Violations Observed	• RCRA Inspection on exempt units • Additional data submitted per request. No closing report ever received		N/A	N/A		Closed		
Sep-16			Millington	RCRA Part B	TDEC	Yes	4 violations: 3 regarding the log and how maintained; 1 with used oil container not being labelled. TTRT requested that 2 of the 4 be withdrawn.	10-Day Inspection	Draft	TBD	Closed	Closed	Closed		
Jun-16			East Chicago		IDEM (CEI)-IDEM Solid Waste	No	• No Violations Observed	N/A		N/A	N/A		Closed		
Jun-16			Millington	RCRA Part B	TDEC w/DSWM	Yes	*Missing information in 5-day log *Missing information in 10-day log *Loading hazardous waste outside of a permitted area *Hazardous waste outside of a permitted area *Hazardous waste outside a permitted area *Containers missing hazardous waste labels *Open cubic yard containers (CYB) Unstable stacking *3 areas over capacity (assumption based on container volume not manifested volume) *Open SAA container and 90-day roll off box that plastic cover had blown into the box. *Aisle space caused by staging in drive rows Unlabeled containers (shrink wrapped pallet from generator with expired consumer product) *2 containers with integrity issues *6 batteries missing universal waste labels *Painted boundaries no visible *Hazardous waste observed in Unit 212 prior to completion of partial closure of the miscellaneous unit.	All observations were corrected at the time of the inspection with the exception of 3 items corrected by 6/13/16	Draft	TBD	22,444	Closed	Closed	NOV	
May-16			East Chicago		IDEM-USEPA Region 5 Air	No	• Air emissions inspection & follow-up to 114 information request	N/A					Open		
Mar-16			East Chicago		IDEM (CEI)	No	• No Violations Observed	N/A	No	N/A	N/A		Closed		
Feb-16			East Chicago		IOSHA	Yes	• Fatality Investigation • Confined Space Entry Program • First Aid not available	• Informal Conference	Yes	\$6,100.00	N/A		Closed	NOV	
Feb-16			Millington		TDEC on behalf of USEPA Region 4 TSCA Div	No	Containers not labeled appropriately	All equipment relabeled with appropriately sized PCB labels	No	TBD	None	Open	Closed	NOV	CO
Jan-16			East Chicago		IDEM (CEI)	No	• No Violations Observed	N/A	No	N/A	N/A		Closed		
Jan-16			East Chicago		DOT-FRA	No	• No Violations Observed	N/A	No	N/A	N/A		Closed		
Jan-16			East Chicago	3736-A, 23786-A, 24092-A	IDEM (Air)	Yes	• Failed Stack Test • Failure to submit notification of applicability	• Proper notifications submitted and performed stack test	Yes	\$172,674	\$90,532		Closed		
Jan-16			East Chicago		DOT	Yes	• Non Tool Tight Fittings	• SOP revision, training • Employee release due to multiple incidents	Yes	\$5,000	\$3,500		Closed		
Dec-15			East Chicago		USEPA	Yes	• Annual Export Report errors for yrs 2011, 2013 & 2014 (self notification 2012)	• Review; revised and resubmitted report.	Yes	\$11,000	\$11,000		Closed		
Nov-15			Millington		MSCHD	No	Air – No violations observed		No	None	None		Open	NOV	CO
Oct-15			East Chicago		IDEM Solid Waste	No	• Signage	• Relocation of sign displaying the emergency contact number	No	N/A	N/A		Closed		
Oct-15			East Chicago		City of East Chicago (Health Dept.)	No	• No Violations Observed	N/A	No	N/A	N/A		Open	NOV	
Sep-15			East Chicago		IDEM (CEI)	Yes	• Container Management, • Universal Waste Management • Container Storage and Treatment Conditions • Management of Containers	• Daily Inspections of container labeling, integrity and storage as related to Tradebe's permit • Increased emphasis on and training on environmental regulations	Yes	\$25,000	\$25,000		Closed		
Sep-15			East Chicago		EPA and IDEM AIR	No	• No Violations Observed	N/A	No	N/A	N/A		Open		
May-15			East Chicago		IDEM (CEI)	Yes	• Container Storage and Treatment Conditions • Management of Containers	• Leaking ball valve on vac truck was fixed/replaced by maintenance. • 8-hr staging logs for liquid material to document container movement.	Yes	Combined with Sept 15th penalty	Combined with Sept 15th penalty		Closed		

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May-15			Millington		TDEC aith DSWM		Roll off boxes outside of a permitted unit Aisle Spacing Stable Stacking Damaged Floor coating in Unit 202 Waste Stored over 1 year Generator roll-off box outside of a permitted unit	Onsite generated waste stored in a 90-day generator storage area not required to be in permitted storage - violation appealed Corrected soon after inspection Corrected soon after inspection Violation corrected 10/2/15 Corrected upon approval of waste stream into disposal facility Violation corrected 6/3/15		Unknown	N/A		Closed		CO
Feb-15			Millington		TDEC w/DSWM		Roll off boxes outside of a permitted unit Aisle Spacing Stable Stacking Container integrity (2 cubic yard boxes had opened due to weather, inside liners were still intact) Open Box of fluorescent bulbs Labeled onsite generated waste missing accumulation date Unlabeled containers (shrink wrapped pallet from generator with expired consumer product) Pallet obscuring sump grate Unit 217 boundary not visible Missing used oil label Waste Stored over 1 year 3 Units over permitted capacity	Onsite generated waste stored in a 90-day generator storage area not required to be in permitted storage - violation appealed Corrected soon after inspection Corrected soon after inspection Corrected during inspection Corrected during inspection Corrected during inspection material just off loaded. Corrected during Receiving Operations Violation corrected 10/2/15 Corrected during Inspection Corrected as soon as weather permitted Corrected during inspection Corrected during inspection Corrected upon approval of disposal facility Based on Manifested volume the three cited units were within the permitted capacities - Violation appealed		Unknown	N/A		Closed		