RCRA CORRECTIVE ACTION PROGRAM

STATEMENT OF BASIS

October 2019

RMI Properties, LLC
Formerly Summit Circuits
Formerly GCI, Inc.
14510 Lima Road
Huntertown, Indiana
U.S. EPA ID. IND 000 715 060

I. INTRODUCTION

Under the Resource Conservation and Recovery Act (RCRA), all permitted and interim status hazardous waste treatment, storage, or disposal facilities are required to conduct corrective action for any releases of hazardous waste or hazardous constituents at or from their facilities.

This Statement of Basis is issued by the Indiana Department of Environmental Management (IDEM), regarding RMI Properties, LLC, formerly Summit Circuits, GCI, Inc., 14510 Lima Road, Huntertown, Indiana, 46748. IDEM has determined that no further RCRA corrective action is necessary for any of the identified Solid Waste Management Units (SWMUs) or Areas of Concern (AOCs) at this facility.

IDEM is issuing this Statement of Basis as part of its public participation responsibilities under RCRA Corrective Action Program guidance, and is using the administrative procedures found in 40 CFR Part 270, as adopted by reference, to provide public notice and solicit comment. The public notice period is hereby announced and will continue for 30 days from the published date of the Public Notice in the Journal Gazette. If requested, a public hearing may be held to accept comments.

This Statement of Basis summarizes information found in greater detail in the work plans, reports, or other documents in this facility’s administrative record which can be accessed via IDEM’s Virtual File Cabinet (VFC). IDEM encourages the public to review these documents in order to gain a more comprehensive understanding of the facility and the activities that have been conducted under RCRA authority. IDEM may modify this corrective action determination or select another remedy based on public comments or new information obtained.
This determination will complete the corrective action process under the RCRA Corrective Action Program for this facility. The facility must continue to comply with all applicable parts of RCRA.

II. FACTILITY BACKGROUND

GCI, LLC and Summit Circuits manufactured and sold printed circuit boards at this facility until 2001. This process included copper, nickel, gold, and lead-solder plating, etching of copper, and cleaning operations. GCI generated the following waste streams: waste ammonia etchant (D002), wastewater treatment sludge (F006), waste solder strip (D008), waste biodegradable cleaner (nonhazardous), and used oil (nonhazardous). GCI started operations at the facility in 1969.

RMI Properties, LLC presently owns the facility and is manufacturing electronics at the facility.

III. SITE ASSESSMENT

U.S. EPA conducted a site visit on November 23, 1992, to evaluate the facility for SWMUs and AOCs that required additional scrutiny. During this visit, the following SWMUs and AOCs were evaluated:

<table>
<thead>
<tr>
<th>Unit Name</th>
<th>Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>SWMU 1 Waste Ammonia Etchant Tank</td>
<td>RCRA Closure</td>
</tr>
<tr>
<td>SWMU 2 Container Storage Area 1 (CSA 1)</td>
<td>Soils investigation</td>
</tr>
<tr>
<td>SWMU 3 Container Storage Area 2 (CAS 2)</td>
<td>No Further Action at this Time (NFA)</td>
</tr>
<tr>
<td>SWMU 4 Container Storage Area 3 (CSA 3)</td>
<td>NFA</td>
</tr>
<tr>
<td>SWMU 5 Container Storage Area 4 (CAS 4)</td>
<td>NFA</td>
</tr>
<tr>
<td>SWMU 6 Methyl Ethyl Ketone Distilling Area</td>
<td>NFA</td>
</tr>
<tr>
<td>SWMU 7 Waste Solder Plating Bath and Solder Strip Container Storage Area</td>
<td>Build a dike around the area</td>
</tr>
<tr>
<td>SWMU 8 Organic Polymer Accumulation Area</td>
<td>NFA</td>
</tr>
<tr>
<td>SWMU 9 Wastewater Treatment Plant</td>
<td>NFA</td>
</tr>
<tr>
<td>SWMU 10 Wastewater Sludge Accumulation Area</td>
<td>NFA</td>
</tr>
<tr>
<td>SWMU 11 Used Oil Accumulation Area</td>
<td>NFA</td>
</tr>
<tr>
<td>SWMU 12 Organic Polymer Neutralization Tank</td>
<td>NFA</td>
</tr>
<tr>
<td>AOC 1 Contaminated Ditch</td>
<td>Removal of sediments</td>
</tr>
</tbody>
</table>
IV. SUMMARY OF THE CORRECTIVE ACTION DETERMINATION

Based on the administrative record, IDEM is proposing no further action for all of the identified SWMUs and AOCs. IDEM is proposing that a Corrective Action Complete With Controls determination be issued for the RMI Properties, LLC facility. "With Controls" means that the facility will be restricted to industrial/commercial uses only. The ground water is restricted to industrial/commercial purposes and soils will not be excavated at depths greater than four (4) feet unless approved by IDEM.

V. PUBLIC PARTICIPATION

The public is encouraged to review and submit written comments on this proposed determination, particularly if you are aware of spills and/or releases that have occurred at this facility in the past. If requested, IDEM may hold a public hearing to discuss any remedial actions the public proposes. IDEM will publish a newspaper notice of the hearing 30 days in advance.

The Public Notice and the administrative record are available for review on IDEM's Virtual File Cabinet, which is found at: www.idem.IN.gov (select "eServices" under "Resources"). VFC document numbers are provided in Section VI. for the primary documents IDEM used to support this decision.

After considering any comments received, IDEM will summarize the comments and its responses to the comments, and announce its decision in a Final Decision/Response to Comments document. This document will be incorporated into the administrative record. To send written comments or obtain further information, contact:

Chris L. Myer
Indiana Department of Environmental Management
Office of Land Quality
Hazardous Waste Permit Section
IGCN Rm 1101
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Phone: (317) 233-4625
E-mail: cmyer@idem.IN.gov

VI. REFERENCES

Environmental Restrictive Covenant, dated February 4, 2019
(VFC # 82692711)

Phase 1 Environmental Site Assessment, dated September 4, 2003
(VFC # 80585567)

Contaminated Ditch Status Review, dated February 17, 1998
(VFC # 80011464)

Preliminary Assessment Visual Site Inspection, dated March 3, 1993
(VFC # 80063568)