



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • Fax (317) 233-6647 • www.idem.IN.gov

Mike Braun
Governor

Clint Woods
Commissioner

RCRA CORRECTIVE ACTION PROGRAM

STATEMENT OF BASIS January 12, 2026

Former Trittech Manufacturing, Inc. (Trittech)
2728 Commercial Road
Fort Wayne, Indiana
U.S. EPA ID. IND 042846592

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 release 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 the former Trittech Manufacturing, Inc., 2728 Commercial Road, Fort Wayne, Indiana 46809. IDEM has determined that no further 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 comments. 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 newspaper.

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 completes 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.

Visit on.IN.gov/survey or scan the QR code to provide feedback.

We appreciate your input!



II. FACILITY BACKGROUND

The former Trittech Manufacturing, Inc. began operations in 1968 manufacturing circuit boards for various uses. Operations were conducted in a building (70 feet by 150 feet) located on 5.4 acres of land in Fort Wayne. The facility process included drilling, machining, non-cyanide plating of copper and tin, wastewater pretreatment, shipping and receiving. The plating process involved dipping printed circuit boards into a chemical bath to achieve an etching made to a specification as desired by customers. The dipped circuit boards were then rinsed with tap water. Wastewater from facility processes was pretreated to remove solids prior to being discharged to the City of Fort Wayne sewer system under a wastewater pretreatment permit. Trittech operated as a small quantity generator after notifying IDEM of a change from large quantity generator status in February 2004 (VFC# [26357114](#)). Hazardous waste historically generated at the site included the following:

- Waste water treatment sludge (F006)
- Spent etchant (D002)
- Spent solvent (Methyl Ethyl Ketone), and still bottoms (F005) from solvent used for silk screen cleaning.
- Spent solder flux (D002, D008)

At the time of IDEM's 2018 RCRA Facility Assessment (RFA) (VFC# [83674227](#)), the only hazardous waste generated at the facility was pressed wastewater treatment sludge (F006). Spent etchant was sent offsite for re-use as a recycled material. Citrus based cleaners were primarily used in the cleaning of circuit boards as part of the silk-screening process. Solder flux containing lead had not been used at Trittech since around 2003, based on a Hazardous Waste Handler Identification form signed February 2003 (VFC# 26357183).

Solid waste generated at the facility included wipes, general office waste, and baghouse dust generated from drilling and machining fiberglass cores prior to plating. Scrap metal including aluminum, tin, and copper was recycled. Silver generated from a photo process that puts an image on the circuit board was also reclaimed.

A November 2023 Hazardous Waste Inspection Report (VFC# [83562207](#)) stated the facility was purchased by Colin and Kelly Daseler earlier that year and operated Daseler Builders at the location. The inspection determined that Trittech had illegally stored hazardous waste sludge (F006) in two former Wastewater Treatment Collection Pits (SWMU 2) after ceasing operations in 2019 and prior to the sale of the property.

The two hazardous waste storage pits were clean closed in accordance with an approved closure plan (VFC# [83794133](#)) as outlined in the October 2025 RCRA Closure Report (VFC# [83885906](#)). IDEM approved closure certification on December 17, 2025 (VFC# [83909100](#)). With receipt of the certification, total closure in accordance with 40 CFR 264

Subpart G was complete, as required by IDEM Agreed Order (Case No. 2023-29794-H) (VFC# [83694978](#)).

III. SITE ASSESSMENT

IDEM conducted a site visit on November 17, 2017, to evaluate the facility for SWMUs and AOCs that required additional scrutiny. During this visit, the following SWMUs and AOCs were evaluated:

SWMU 1 Former Hazardous Waste Container Storage Area

SWMU 2 Wastewater Treatment Plant/Sludge Pits

None of the SWMUs or AOCs showed evidence of an existing release at the time of the RFA (VFC # [83674227](#)). Furthermore, subsequent RCRA closure work associated with SWMU 2 (VFC# [83794133](#)) showed no evidence of a release to the environment.

IV. SUMMARY OF THE CORRECTIVE ACTION DETERMINATION

Based on the administrative record, IDEM is proposing no further action for all identified SWMUs and AOCs. IDEM recommends that a Corrective Action Complete Without Controls determination be issued for the former Trittech facility. “Without Controls” means there is no known contamination remaining on-site that requires the use of an engineered control to prevent unacceptable risks to human health or ecological receptors and land use restrictions through an environmental restrictive covenant is not required.

V. PUBLIC PARTICIPATION

The public is encouraged to review and submit written comments on this proposed determination, particularly if you are aware of past spills and/or releases that have occurred at this facility. You may request IDEM hold a public hearing. At a public hearing, you would have the opportunity to submit oral or written comments. If a public hearing is held, IDEM will make a separate announcement of the date, time, and location of that hearing at least 30 days in advance.

The Public Notice and the administrative record are available for review on IDEM’s Virtual File Cabinet. To view these documents, go to www.in.gov/idem/legal/public-records/virtual-file-cabinet/. VFC content numbers are provided in Section VI. of this notice for the primary documents IDEM used to support its decision.

Before taking final action, IDEM will give full consideration to all significant and relevant 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:

Jeff Workman
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) 232-3221
E-mail: jworkman@idem.IN.gov

VI. REFERENCES

<i>Document Name</i>	<i>VFC #</i>
Hazardous Waste Site Inspection (9-21-87)	47928587
Preliminary Assessment/Site Inspection (CERCLIS, 1-18-88)	47928585
Preliminary Assessment (2-13-1990)	47928542
RCRA Compliance Evaluation Inspection (2-14-91)	26889331
Preliminary Soil Contamination Investigation (12-8-92)	80425501
IDEM Agreed Order (Cause No. H-10840) (4-30-93)	80424957
CERCLIS Focused Site Inspection Prioritization (4-20-94)	48003781
Approved Revised Closure Plan for Container Storage Unit (7-13-94)	80424904
Modified Closure Plan Approval (10-31-94)	80424899
RCRA Closure Certification Report (8-31-95)	80424901
Closure Certification Approval (10-26-95)	80424900
Hazardous Waste Handler Identification Form (February 2003)	64510382
RCRA Compliance Evaluation Inspection (8-5-03)	26894092
Hazardous Waste Handler Identification Form (6-1-04)	26357114
RCRA Compliance Evaluation Inspection (2-11-11)	61317144
RCRA Facility Assessment (2-7-18)	83674227
Violation Letter/Hazardous Waste Inspection Report (11/22/23)	83562207
IDEM Agreed Order (Case No. 2023-29794-H) (9-5-24)	83694978
Approved Revised RCRA Closure Plan for Pits (4-14-25)	83794133
IDEM Approval of Revised Closure Plan for Pit (5-7-25)	83803498
Closure Certification Report for Wastewater Sludge Pits (10-22-25)	83885906
Closure Certification Approval (12-17-25)	83909100