



**ETHICS DISCLOSURE STATEMENT**  
**CONFLICTS OF INTEREST – DECISIONS AND VOTING**  
 State Form 55860 (R / 10-15)  
 OFFICE OF THE INSPECTOR GENERAL  
 IC 4-2-6-9

INDIANA  
 STATE ETHICS COMMISSION

APR 19 2021

**FILED**

In accordance with IC 4-2-6-9, you must file your disclosure with the State Ethics Commission no later than seven (7) days after the conduct that gives rise to the conflict. You must also include a copy of the notification provided to your agency appointing authority and ethics officer when filing this disclosure. This disclosure will be posted on the Inspector General's website.

Name ( <i>last</i> ) Rohr	Name ( <i>first</i> ) Kimberly	Name ( <i>middle</i> )
Name of office or agency Indiana Department of Environmental Management		Job title Senior Environmental Manager 1
Address of office ( <i>number and street</i> ) 100 N. Senate Ave.		City Indianapolis
Office telephone number ( 317 ) 719-1666		ZIP code 460204
Office e-mail address ( <i>required</i> ) krohr@idem.in.gov		

Describe the conflict of interest:  
 I currently work as an NPDES inspector for the Office of Water Quality. I have applied for a position at AES Indiana as a Senior Analyst, Environmental, Health and Safety. This position is responsible for ensuring IPL Eagle Valley and IPL Harding Street maintain compliance with all environmental regulations, including NPDES permits. Last year, I inspected IPL Eagle Valley which is owned by AES Indiana. The assigned inspector took a promotion to another section and I covered her inspection area. I no longer cover any territory where IPL or AES maintain an NPDES permit.

Describe the screen established by your ethics officer: *(Attach additional pages as needed.)*

See attached.

**AFFIRMATION**

Your signature below affirms that your disclosures on this form are true, complete, and correct to the best of your knowledge and belief. In addition to this form, you have attached a copy of your written disclosure to your agency appointing authority and ethics officer.

Signature of state officer, employee or special state appointee



Date signed *(month, day, year)*

04/19/2021

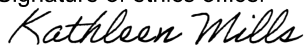
Printed full name of state officer, employee or special state appointee

Kimberly Rohr

**FOR ETHICS OFFICER USE ONLY**

Your signature below affirms that you have reviewed this disclosure form and that it is true, complete, and correct to the best of your knowledge and belief. You also attest that your agency has implemented the screen described above.

Signature of ethics officer



Date signed *(month, day, year)*

04/19/2021

Printed full name of ethics officer

Kathleen Mills

**Protocol to Screen  
IDEM Employee Kim Rohr  
From any matter regarding AES Corp.**

Ms. Rohr is a Senior Environmental Manager within the Office of Water Quality (“OWQ”) at the Indiana Department of Environmental Management (“IDEM”). Her duties in the position include sewer ban coordinator, lab and operation assistance and wastewater facility inspector. As sewer ban coordinator, she analyzes flows of municipal wastewater treatment plants to ensure the facilities are not operating the plant above what it is designed to treat. She inspects wastewater treatment facilities for compliance with their NPDES permits and provides lab training and trouble shooting of operational issues at small treatment plants.

Ms. Rohr has recently applied for a position of Senior Analyst, Environmental, Health and Safety with AES Corp. at a facility formerly known as IPL (Indianapolis Power and Light). The responsibilities of the prospective position include:

- Ensuring compliances at the Harding Street Station, Georgetown, and Eagle Valley Station facilities
- Counseling and training personnel on the scope of all current environmental regulations
- Compiling environmental operating data for transmittal to governmental agencies
- Assuring accuracy of the environmental operating data through quality assurance programs
- Reviewing operational data for violations and trends and reporting all violations and/or problems to the appropriate entity
- Assisting personnel in solving any environmental regulatory violations or problems
- Inspecting the facility to ensure compliance.

Ms. Rohr is currently not assigned any matters involving AES Corp. However, she did, on one occasion, inspect the IPL Eagle Valley facility for NPDES permit compliance when another IDEM employee, who was assigned the facility to inspect, was unable to do so.

IDEM will institute the following protocol.

1. Office of Water Quality (“OWQ”) Enforcement and Section Chief, Samantha Groce, is Ms. Rohr’s immediate supervisor. SC Groce will not assign to Ms. Rohr any current or future matter that may arise involving AES Corp.
2. Ms. Rohr shall recuse herself from the portion of any meeting in which discussions specific to AES Corp. are discussed or are expected to be discussed.
3. Ms. Rohr shall not discuss any matter involving AES Corp. with any IDEM employee.
4. SC Groce will notify the employees in Ms. Rohr’s section, in writing, that they are not to discuss any matter involving AES Corp. with Ms. Rohr or send her any emails concerning the corporation.
5. Ms. Rohr shall not access any correspondence or files relating to or involving AES Corp.

6. Ms. Rohr shall not participate in decisions regarding or relating to AES Corp.
7. Ms. Rohr shall immediately inform her supervisor and the IDEM Chief Ethics Officer if any provision of this screening protocol is violated.
8. Ms. Rohr shall follow IC 4-2-6-9(b) and file a written disclosure statement with the State Ethics Commission.
9. All signatories to this protocol shall review it within thirty(30) days from the date of the last signature to assure it has been followed and determine if the circumstances have changed to make the protocol no longer necessary.



\_\_\_\_\_  
Kim Rohr  
Senior Environmental Manager 1  
Enforcement \_\_\_\_\_ Section

04/19/2021

\_\_\_\_\_  
Date



\_\_\_\_\_  
Samantha Groce  
Section Chief  
Enforcement \_\_\_\_\_ Section

April 19, 2021

\_\_\_\_\_  
Date



\_\_\_\_\_  
Kathleen Mills  
Chief Ethics Officer  
Office of Legal Counsel

April 19, 2021

\_\_\_\_\_  
Date

## Rohr, Kimberly

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**From:** Rohr, Kimberly  
**Sent:** Monday, April 19, 2021 4:05 PM  
**To:** PIGOTT, BRUNO  
**Subject:** RE: Ethics Disclosure

Bruno,

Just wanted to add there is a potential of conflict of interest. When Missy was promoted last year, I covered one of her commitments (NPDES inspection) which was IPL Eagle Valley. This position would be responsible for ensuring IPL Eagle Valley and IPL Harding Street remain in compliance with all environmental regulations including NPDES permits.



*Celebrating Thirty-Five  
Years of Protecting  
Hoosiers and Our  
Environment*

**Kim Rohr**

Sewer Ban Coordinator, Lab/Operator Assistance,  
Wastewater Facility Inspector

(317) 719-1666 • [krohr@idem.in.gov](mailto:krohr@idem.in.gov)

**IDEM values your feedback.**

Please take two minutes and complete this brief survey.



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[www.coronavirus.in.gov](http://www.coronavirus.in.gov)



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**From:** PIGOTT, BRUNO <[BPIGOTT@idem.IN.gov](mailto:BPIGOTT@idem.IN.gov)>

**Sent:** Friday, April 16, 2021 4:46 PM

**To:** Rohr, Kimberly <KRohr@idem.IN.gov>  
**Cc:** MILLS, KATHLEEN <KMILLS@idem.IN.gov>  
**Subject:** RE: Ethics Disclosure

OK, thanks Kim.

Bruno Pigott  
IDEM | Commissioner  
100 N. Senate Avenue  
Indianapolis, IN 46204  
[bpigott@idem.in.gov](mailto:bpigott@idem.in.gov)  
317-232-8611  
317-902-9377 (cell)

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**From:** Rohr, Kimberly <KRohr@idem.IN.gov>  
**Sent:** Friday, April 16, 2021 2:21 PM  
**To:** PIGOTT, BRUNO <BPIGOTT@idem.IN.gov>  
**Cc:** MILLS, KATHLEEN <KMILLS@idem.IN.gov>  
**Subject:** Ethics Disclosure

Bruno,

To comply with IAC 4-2-6-9, I am letting you know I have applied for a position with AES (old IPL) as Senior analyst, environmental, health and safety. I have been in touch with Kathy Mills and we are working on a screening protocol. Please let me know if you need any other information.

Thank you.



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Environment*

Kim Rohr  
Sewer Ban Coordinator, Lab/Operator Assistance,  
Wastewater Facility Inspector  
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**IDEM values your feedback.**  
Please take two minutes and complete this brief survey.



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