



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. Box 19276, SPRINGFIELD, ILLINOIS 62794-0276 • (217) 782-2829
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 • (312) 814-6026
BRUCE RAUNER, GOVERNOR **ALEC MESSINA, ACTING DIRECTOR**

(217) 782-5544

February 10, 2017

Baxter Healthcare Corporation
c/o CT Corporation System
208 South LaSalle Street, Suite 814
Chicago, Illinois 60604

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

7012 0870 0001 3000 7480

Re: Notice of Intent to Pursue Legal Action
Violation Notice: W-2016-50041
Facility I.D.: Baxter Healthcare Corporation – IL0024074 – W0978070012

Dear Sir or Madam:

This Notice of Intent to Pursue Legal Action is provided pursuant to Section 31(b) of the Illinois Environmental Protection Act ("Act"), 415 ILCS 5/31(b) (2014). The Illinois Environmental Protection Agency ("Illinois EPA") is providing this notice Baxter Healthcare Corporation has failed to respond adequately to the Violation Notice dated August 15, 2016, which was issued by the Illinois EPA within the time frame required by Section 31 of the Act.

The Illinois EPA is providing this notice because it may pursue legal action for the violations of environmental statutes, regulations and permits specified in Attachment A. The Notice of Intent to Pursue Legal Action provides the opportunity to schedule a meeting with representatives of the Illinois EPA to attempt to resolve the violations of the Act, regulations and permits specified in Attachment A. If a meeting is requested, it must be held within thirty (30) days of receipt of this notice unless an extension of time is agreed to by the Illinois EPA.

If you wish to schedule a meeting with representatives of the Illinois EPA or have any questions, please contact me at (217) 782-5544 within twenty (20) days of your receipt of this notice.

Sincerely,

Michael S. Roubitchek
Assistant Counsel
Division of Legal Counsel

Attachment

cc: Jeff Wynveen – Baxter Healthcare Corporation

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
RECORDS MANAGEMENT
M. S. RAUNER

MAR 20 2017

REVIEWER: JKS

ATTACHMENT A

Baxter Healthcare Corporation – IL0024074 VIOLATION NOTICE NO. W-2016-50041

A review of information available to the Illinois EPA indicates the following violations of statutes, regulations, or permits. Included with each type of violation is an explanation of the activities that the Illinois EPA believes may resolve the violation including an estimated time period for resolution.

Effluent Violations

Review the treatment plant operations/operational procedures and evaluate the treatment equipment in order to correct the deficiencies which caused the violations. Compliance is expected to be achieved within 30 days.

<u>Violation Date</u>	<u>Violation Description</u>
01/31/2016	Outfall 001 Effluent – BOD, Carbonaceous, Effluent Limit
04/30/2016	
05/31/2016	
Rule/Reg.:	Section 12(a) and (f) of the Act, 415 ILCS 5/12 (a) and (f) (2014) 35 Ill. Adm. Code 304.141(a) and NPDES Permit #IL0024074

<u>Violation Date</u>	<u>Violation Description</u>
05/31/2016	Outfall 001 Effluent – Solids, total suspended, Effluent Limit
Rule/Reg.:	Section 12(a) and (f) of the Act, 415 ILCS 5/12 (a) and (f) (2014) 35 Ill. Adm. Code 304.141(a) and NPDES Permit #IL0024074