

November 7, 2016

Illinois EPA / Bureau of Water  
1021 N. Grand Ave. East  
P.O. Box 19276  
Springfield, IL 62794-9276  
Attn: Caleb Ruyle / CAS #19

RE: Additional Responses to Violation Notice number **W-2016-50041**  
Baxter Healthcare Corporation  
Round Lake, IL. – NPDES Permit Number IL0024074

Mr. Ruyle:

This correspondence provides further detail, as requested by IEPA, regarding Baxter's September 22, 2016 response letter to Violation Notice Number W-2016-50041 (IL0024074). On an October 31, 2016 call, the agency asked for more details regarding responses to the exceedances. Steps taken by Baxter to address the exceedances have included the following:

- Baxter has placed restrictions on our manufacturing facilities to restrict discarding large volumes of high BOD containing solutions. One of these solutions is a soy-based media broth that is used to validate our manufacturing equipment twice per year for each of our individual production lines. The use of this solution is required to be used for validation purposes by the Food and Drug Administration. As part of our investigation of the BOD exceedance, it was discovered that after validation solutions were being discarded directly to sanitary sewer. This practice has been discontinued because it results in additional BOD loading to our Wastewater Treatment Plant.
- We have also placed restrictions on unanticipated product recalls being shipped by our distribution partners and treated within our wastewater treatment plant. It is important to note that not all product recalls are shipped to our Round Lake facility for processing. ~~Specific disposal methods are dependent upon the type of product being recalled and the region from which the material is being held.~~ Recalled material is typically incinerated or landfilled at a licensed and approved Treatment, Storage and Disposal Facility (TSDF) that is located within that Region or State.

However, there are occasions that we have accepted and processed recalled product solutions consisting of mainly water, normal saline, amino acids and dextrose. We have since initiated further restrictions on the volumes of recalled products that contribute to higher BOD loading, especially during the winter months when the biological activity within our Wastewater Treatment Plant is lower than normal. We have found that the Wastewater Treatment Plant can better handle such materials in non-winter months. Thus, we will no longer accept material in the winter months. We will assess our ability to accept material in the Spring of 2017.

IEPA-DIVISION OF RECORDS MANAGEMENT  
RELEASABLE

**JAN 09 2017**

**REVIEWER: EMI**

Since the May exceedances and the implementation of preventive actions outlined in Baxter's 9/22/2016 letter to IEPA, our treatment plant continues to maintain compliance and is operating within permit limitations. Although we cannot guarantee that the steps we have taken will completely stop all exceedances, we are hopeful, based on our investigation, that the main causes of the exceedances have been addressed and we do not anticipate further permit exceedances. If you have any questions, please call me at 224-270-3503.

Sincerely,

A handwritten signature in cursive script, appearing to read "Glenn T. Semple".

Glenn T. Semple, M.S., C.S.P.  
Environment, Health, Safety and Sustainability Manager

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Agency ID: 170000103457

Media File Type: WATER

Bureau ID: W0978070012

Site Name: Baxter Healthcare-round Lake

Site Address1: 3900 Foster McGaw Dr

Site Address2:

Site City: Waukegan

State: IL

Zip: 60087-

**This record has been determined to  
be partially or wholly exempt from  
public disclosure**

**Exemption Type:**

**Exempt in Whole**

**Exempt Doc #: 9**

**Document Date: 8 /15/2016**

**Staff: EMI**

**Document Description: EDG MEMORANDUM**

**Category ID: 08      Category Description: COMPLIANCE**

**Exempt Type: Exempt in Whole**

**Permit ID: VN W-2016-50041**

**Date of Determination: 1 /9 /2017**