



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

March 23, 2022

Via E-Mail: John.Camphouse@polyjohn.com Via E-Mail: Ken.Cooper@polyjohn.com

John Camphouse, Chief Financial Officer
PolyJohn Real Estate, LLC
2500 Gaspar Avenue
Whiting, Indiana 46394

Kenneth Cooper, Registered Agent
PolyJohn Real Estate, LLC
2500 Gaspar Avenue
Whiting, Indiana 46394

Dear Mr. Camphouse and Mr. Cooper:

Re: Approval of Compliance Plan
Commissioner, Indiana Department of
Environmental Management
v.
PolyJohn Enterprises Corporation
Case No. 2020-27426-W
Whiting, Lake County

The Indiana Department of Environmental Management (IDEM) has completed the review of the PolyJohn Enterprises Corporation's Compliance Plan. It is hereby approved and incorporated into the Agreed Order and shall be deemed an enforceable part thereof. PolyJohn Enterprises Corporation should continue to implement the approved Compliance Plan and adhere to all milestone dates contained therein. Following the Initial Evaluation phase, a more comprehensive and specific plan for the clean-up and monitoring phases shall be submitted to IDEM for review and approval within eight weeks of the date of this letter.

If you have any questions, please contact Jessica Irvine, Case Manager, Water Enforcement Section, at (317) 233-5975 or jirvi@idem.in.gov.

Sincerely,

Amari Farren, Chief
Water Enforcement Section
Office of Water Quality

Enclosure



cc: Ron Novak, City of Hammond
Carl Woodrich, DNR
Lake County Health Department
<http://www.in.gov/ideM>

**PolyJohn Enterprises
Stormwater
Agreed Order Compliance Plan
March 9, 2022**

General

This Compliance Plan has been prepared pursuant to an Agreed Order (Case No. 2020- 27426-W) between the Indiana Department of Environmental Management and PolyJohn Enterprises. This Compliance Plan specifically addresses the deficiencies and violations described in the Agreed Order and includes the following:

- 1. Assure proper clean-up and disposal of plastic chips originating at PolyJohn Enterprises found on near-by properties in accordance with the Agreed Order.**
- 2. Develop milestone dates for correcting deficiencies and violations described in the Agreed Order.**

Task Description and Completion

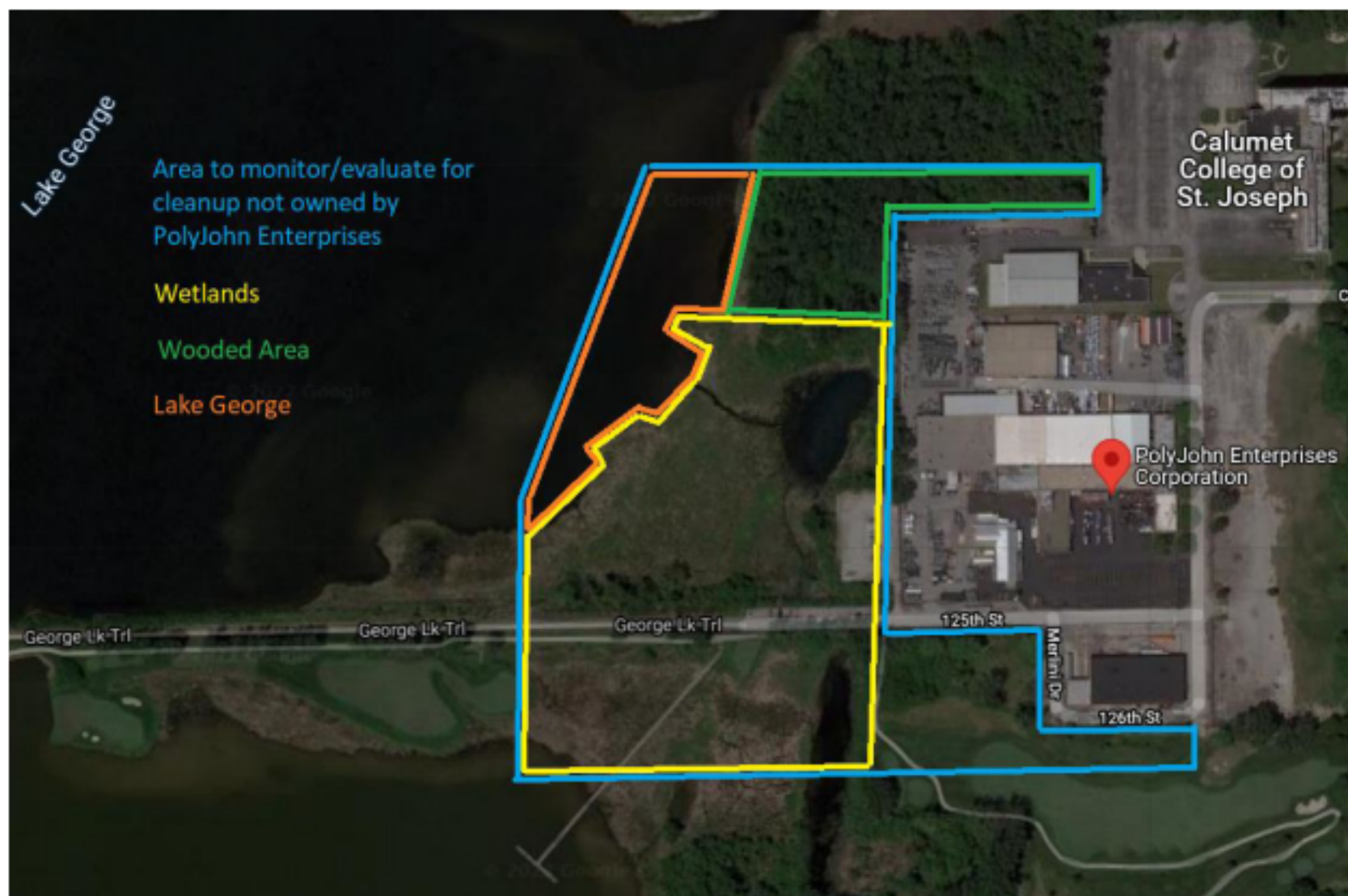
Assure proper clean-up and disposal of plastic chips originating at PolyJohn Enterprises found on near-by properties in accordance with the Agreed Order.

Response to Property not owned by PolyJohn Enterprises.

Monitoring areas near PolyJohn property to identify, remove, and dispose of plastic chips in accordance the Agreed Order, in a way that minimally disturbs the ground surface, and in accordance with applicable regulations. A third-party response contractor (National Industrial Maintenance (NIM)) will be used to ensure proper and professional execution of this task. Disposal will be conducted according to federal, state, and local requirements. Proof of disposal will be submitted to the IDEM case manager with-in two weeks of disposal. A final written report will be submitted to IDEM with-in 30 days of completion of implementation of the Compliance Plan. The final report and evaluation of the site for adequate removal of plastic chips will be subject to IDEM approval.

Area

The work area is the areas immediately West of PJE property extending to include the Eastern shore of Lake George. This area is made up wooded area, wetland area, and portions of Lake George. This area is selected based on the areas where chips have been observed and are likely to have traveled via water flow, and air flow.



Initial Evaluation

Areas will be walked by both PJE staff as well as NIM staff. Staff will identify and document where chips are found, the environmental conditions, and in what quantities. This data will be used to formalize a more detailed cleanup plan. The more detailed cleanup plan will be featured in a more detailed Compliance Plan to be released according to the Compliance Schedule below.

These plans will detail zones based on environment and cleanup method. Each zone will have an identifier and methods of cleanup to be used. The methods will be based on the environment and chip density.

An area (Monitoring Area) of each zone will be chosen to be photographed in order to communicate progress. Each Monitoring Area will be chosen based on highest chip density and accessibility.

A map will be developed to show each zone location, details about each zone (environment, chip density, location of Monitoring Area), as well as locations of any booms or other equipment that may be left on site.

Monitoring

If/when Monthly monitoring shows a significant concentration of chips ("significant" to be determined in the more detailed Compliance Plan) on the surface, NIM will be contacted to schedule prompt and proper cleanup and disposal.

Removal Methods

a. Vacuum

High velocity vacuums will be used to vacuum surface debris off of solid surface (dirt). This is expected to collect chips as well as loose materials such as leaves. It is not expected to disturb the surface layers or soil.

b. Containment Booms

A containment boom (Elastec TundraBoom) designed to rest on top of the ground and float on top of water should the area flood preventing additional chips from further contaminating Lake George. NIM will then collect any floating chips in the area utilizing skimmers. These booms are designed not to absorb petroleum. These booms may also be used in wetlands to flood an area and draw chips to the surface of the water to be collected by skimming. An 18" skirt boom will be used to extend the capture area 18" below the water surface.

Disposal

NIM will be contracted to remove and oversee proper disposal of chips.

Materials collected will be hauled according to local, state, and federal requirements to Tri-State Disposal in Riverdale, IL.

Response to property owned by PolyJohn Enterprises.

Implement and implemented measures to minimize or eliminate sources of stormwater pollution on property owned by PolyJohn.

- a. All safety precautions and good judgement need to be exercised when accepting plastic pellets into the storage silo. Misuse of the equipment or failure of transfer equipment could result in a release of plastic pellets. Good communication is maintained between the driver and PolyJohn staff during deliveries in order to respond as quickly as possible to any failures in the process. Procedures have been developed to respond to releases and authorized employees have been trained.
- b. The storage yard is now vacuumed daily for about 5 hours using one of 2 vacuum sweep trucks, in order to collect any chips that may have been released into the yard.
- c. The storage yard is now swept daily in order to collect any chips that may have been released into the yard.
- d. Leaf blowers have been purchased and are used to blow any chips out of tight spaces in the shipping yard to make them easier to collect with vacuum equipment and sweeping operations.
- e. A tractor has now been purchased to aid in maintaining the storage yard, it has a sweeping implement.
- f. Shop vac's have been purchased and are now used to vacuum any chips in the storage yard from tight spaces and any cracks in surfaces.
- g. A curb was installed along the East property line (outfall caused by grade). This curb serves to stop storm water flow before it exits the property and direct it to the storm sewers where any chips should be captured by chip catch screens.
- h. Storm sewers have a filter basket or chip catch screen installed beneath the manhole cover. This filter baskets serves to catch chips and are maintained weekly, or after a significant rainfall or snow melt. These screens are monitored daily and cleaned when chips or debris are found.
- i. Fencing along the East and North property lines have been covered in a fabric used to stop airborne chips from leaving the property.
- j. Three (soon to be four) silos are used to store the majority of plastic chips, pellets, and powders. These are more secure and easily maintained than gaylords.
- k. A new 90,000 lb capacity (19,000 gal) silo is being installed to more securely store regrind chips. This will eliminate about 65% of the storage currently in gaylords.

- l. Gaylords filled by the blending operation are now being banded closed to further secure them from opening.
- m. Materials in the storage yard have now been reconfigured to protect from releases to storm water.
 - a. Gaylords containing chips have been moved to areas that keep them away from storm sewers. This allows any loose chips to settle on asphalt before entering the storm sewers and be collected by yard maintenance before they travel the distance from the gaylords to the nearest storm sewer.
 - b. Gaylords are stored more locally to their source of origin and/or their destination. This reduces the area over which they travel. Therefore, if a gaylord happens to fail or leak the release will be contained to a smaller area, and be more easily responded.
 - c. Material and product storage have been reconfigured to allow for easier cleaning and collection of any chips as well as to keep gaylords as far away as possible from storm sewers.
 - d. A grinding operation that is a source of loose chips has now been moved away from an overhead door. This reduces the proximity of a source of loose chips to the storage yard.
 - e. The Unit Assembly department is a source of loose chips. It has been moved to an area with little or no through traffic. This reduces chips escaping this department on or in the through traffic.
- n. Gaylords filled at the grinding operation are now accumulated at the grinding department during night shifts so that they can be inspected for leaks or damage by day shift. This prevents leaking gaylords from traveling across the storage yard or be placed into storage with damage or leaks.
- o. Material handling traffic has now been largely segregated into inside and outside operations. Inside material handling operations deposit loads near the exits where the outside material handlers receive the materials and transport them around the yard, and vice versa. This limits travel from a more contaminated indoor environment to the more controlled outside environment. Any chips that may collect in/on indoor material handlers are now contained indoors or in areas near exits that are regularly cleaned.
- p. Two anti-static guns have now been purchased and are used to discharge static energy that builds up during the filling of the gaylords, causing chips to stick to the outside of the gaylord. This is performed before the gaylord leaves the building. This reduces a significant source of chips released to the yard environment.
- q. Floor mounted boot brushes have now been installed inside of exits of areas where chips may be found on the floor. This allows employees to brush any chips

out of the soles of their boots before exiting into the outside environment.

- r. Indoor production operations have now been reconfigured to allow for easier control and containment of chips within the building.

Compliance Schedule

	Milestone/Task	Duration	Anticipated Start Date	Target Completion Date
1	Initial Evaluation	4 weeks	CP Approval Date	CP Approval Date plus 4 weeks.
2	Submission of more detailed Compliance Plan	4 weeks	CP Approval Date plus 4 weeks.	CP Approval Date plus 8 weeks.