



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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Eric J. Holcomb  
Governor

Brian C. Rockensuess  
Commissioner

August 7, 2024

## VIA E-MAIL

Ms. Liesel Ray  
Indiana Shingle Recycling, LLC.  
3725 S. Harding Street  
Indianapolis, Indiana 46217  
[lieselray@gmail.com](mailto:lieselray@gmail.com)

Re: Inspection Summary Letter

Dear Ms. Ray:

On August 7, 2024, representatives of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Indiana Shingle Recycling LLC, located at 3725 S. Harding Street, Indianapolis, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection:	Routine
Results of Inspection:	No violations observed. Please see attached inspection report for additional information.

Please direct any questions regarding this letter to Scott Chrysler at (317) 502-8516 or [schrysler@idem.in.gov](mailto:schrysler@idem.in.gov). Thank you for your attention to this matter,

Sincerely,

Scott Chrysler, Industrial Compliance Inspector  
Industrial Waste Compliance Section  
Compliance Branch  
Office of Land Quality

Enclosure  
cc: Marion County Health Department



Visit [on.IN.gov/survey](https://on.IN.gov/survey) or scan the QR code to provide feedback.

*We appreciate your input!*





**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF LAND QUALITY**  
*Legitimate Use Inspection*

**EPA ID NUMBER:** Non-Notifier  
**NAME:** Indiana Shingle Recycling, LLC  
**ADDRESS:** 3725 S. Harding Street  
**CITY & COUNTY:** Indianapolis, Marion County  
**INSPECTION DATE:** August 7, 2024  
**INSPECTOR(S):** Scott Chrysler and Dan Walterman

<u>PERSONS INTERVIEWED</u>	<u>TITLE</u>	<u>TELEPHONE</u>
Liesel Ray	CFO	(317) 752-1543

**PRE-INSPECTION INFORMATION**

On March 14, 2014, Indiana Shingle Recycling received a Legitimate Use Approval Letter to process shingles for use in Hot Mix Asphalt (HMA).

On November 1, 2016, an inspection was conducted. Indiana Shingle Recycling was found to be in violation of conditions 7 and 9 of the legitimate use approval (VFC #80388844).

**7.** Shingles must be stored in a manner to minimize wind and water contact with the shingle material through one of the following methods:

- a) a building, or
- b) a covered containment unit, or
- c) a three-sided concrete bin that meets the following criteria:
  - i. is of solid construction
  - ii. is located on an impervious surface (e.g. asphalt pad, concrete pad, etc.), and
  - iii. is covered with a tarp when material is not being added or removed.

**9.** No shingle pile may exceed 50,000 cubic feet in volume. No shingle pile may exceed a height of 10 feet.

On February 10, 2017, a follow-up inspection was conducted. Indiana Shingle Recycling

remained out of compliance with conditions 7 and 9 (VFC #80431122).

On March 14, 2017, Indiana Shingle Recycling submitted documentation satisfying condition 7 (VFC #80448540).

On March 24, 2017, a follow-up inspection was conducted. Indiana Shingle Recycling remained out of compliance with condition 9 (VFC #80448540).

On April 11, 2017, a short-term Legitimate Use Approval Letter was issued. The initial Legitimate Use Approval Letter expired March 1, 2017 (VFC #80600910). *With this new approval letter, the previous condition 7 was renumbered as condition 8, and condition 9 was renumbered as condition 10.*

On July 6, 2017, an inspection was conducted. Indiana Shingle Recycling remained out of compliance with condition 9 citing the legitimate use approval issued March 14, 2014 (VFC #80509440).

On July 31, 2017, a second short-term Legitimate Use Approval Letter was issued (VFC #80509527). *Condition numbers were retained from the April 11, 2017 approval letter.*

On October 12 and 20, 2017, an inspection was conducted. No violations were observed (VFC #80599969).

On November 8, 2017, a new Legitimate Use Approval Letter was issued, expiring on November 15, 2020 (VFC #82532416). *Condition numbers were retained from the July 31, 2017 approval letter.*

On August 21, 2019, an inspection was conducted. Indiana Shingle Recycling was found to be in violation of conditions 3a, 8, and 10 (VFC #82831725).

**3a.** Shingles have tested negative for asbestos. Every layer of every roof must be tested. Testing results must be made available to IDEM upon request.

**8.** Shingles must be stored in a manner to minimize wind and water contact with the shingle material through one of the following methods:

- d. a building, or
- e. a covered containment unit, or
- f. a three-sided concrete bin that meets the following criteria:
  - iv. is of solid construction,
  - v. is located on an impervious surface (e.g. asphalt pad, concrete pad, etc.), and
  - vi. is covered with a tarp when material is not being added or removed.

**10.** No shingle pile may exceed 50,000 cubic feet in volume. No shingle pile may

exceed a height of 10 feet.

On February 3 and 7, 2020, an inspection was conducted. Indiana Shingle Recycling remained out of compliance with conditions 3a, 8, and 10 (VFC # 82911181).

On February 11, 2020, Indiana Shingle Recycling submitted analytical records in support of condition 3a (included in this report).

On August 31, 2020, an inspection was conducted. Information from the inspection was forwarded to the Office of Land Quality Enforcement Section.

On November 10, 2021, Indiana Shingle Recycling entered into an Agreed Order (Case No. 2020-27348-H).

Between February 1, 2022, and February 20, 2024, Enforcement follow-up inspections were conducted quarterly.

On June 16, 2022, a new Legitimate Use letter was issued (*See Legitimize Use letter dated June 16, 2022*).

On February 23, 2024, IDEM issued a close out letter for Case No. 2022-27348-H.

## **INSPECTION FINDINGS**

On August 7, 2024, IDEM staff conducted a routine inspection of Indiana Shingle Recycling, LLC. Ms. Liesel Ray was on-site to represent the facility during the inspection.

The inspection began at the west side of the pole barn that was previously used for customer drop offs. IDEM staff observed no shingles in this area.

IDEM staff continued the inspection along the northern edge of the property. IDEM staff observed ground shingle material staged loading (Pile A)(See attached Photo Log – Photo 1).

IDEM staff continued along the northern edge of the property where they observed a large L-shape pile (Piles B1 and B2)(See Photo 2) IDEM staff observed that most of the pile was uncovered or covered with degraded tarp. IDEM staff noted that a large number of shingles had been removed since the last inspection.

IDEM staff continued the inspection along the eastern edge of the property and observed two piles (Piles C and D). Pile C was fully covered with tarps while some of the tarps covering Pile D had come off due to high winds (See Photo 3). IDEM staff advises facility staff to recover the pile as soon as possible. IDEM staff observed that

the piles had not changed since the previous inspection, IDEM staff also observed the eastern edge of pile B1/B2 (See photo 4).

IDEM staff continued to the eastern side of the pole barn. IDEM staff observed the western area of Pile B1/B2. IDEM staff observed that additional shingles had been removed since the previous inspection (See Photos 5 and 6).

IDEM staff proceeded to the pole barn where they observed a pile of ground shingle (Pile E) (See photo 4).

Pile	Description	Length (ft)	Width (ft)	Height (ft)	Volume (ft <sup>3</sup> )
A	Ground Shingles	40	6	4	960
B1*	Whole Shingles	125	40	11	55,000
B2*	Whole Shingles	100	55	8	44,000
C	Whole Shingles	77	36	8	22,176
D	Whole Shingles	77	36	8	22,176
E	Ground Shingles	15	20	6	1800

*\*Notes: Piles B1 and B2 were observed as one contiguous pile. This was divided into sections to facilitate measurements.*

The Inspection ended with an exit interview.

### **CONCLUSIONS AND RECOMMENDATIONS**

No new violations were observed during the August 7, 2024 inspection.

## Photo Log

### Photo 1



Facility Name: Indiana Shingle Recycling, LLC.

Photographer: Scott Chrysler (IDEM)

Date: August 7, 2024

Others Present: Dan Waltermann (IDEM) and Liesel Ray (Facility)

Location & Description: Ground material staged for loading

### Photo 2



Facility Name: Indiana Shingle Recycling, LLC.

Photographer: Scott Chrysler (IDEM)

Date: August 7, 2024

Others Present: Dan Waltermann (IDEM) and Liesel Ray (Facility)

Location & Description: Northern edge of pile B1

### Photo 3



Facility Name: Indiana Shingle Recycling, LLC.

Photographer: Scott Chrysler (IDEM)

Date: August 7, 2024

Others Present: Dan Waltermann (IDEM) and Liesel Ray (Facility)

Location & Description: Piles C and D. Pile D's tarps were blown off due to high winds



Photo 4

Facility Name: Indiana Shingle Recycling, LLC.

Photographer: Scott Chrysler (IDEM)

Date: August 7, 2024

Others Present: Dan Waltermann (IDEM) and Liesel Ray (Facility)

Location & Description: Eastern edge of Pile B1/B2



Photo 5

Facility Name: Indiana Shingle Recycling, LLC.

Photographer: Scott Chrysler (IDEM)

Date: August 7, 2024

Others Present: Dan Waltermann and (IDEM) Liesel Ray (Facility)

Location & Description: Ground material to be reground



Photo 6

Facility Name: Indiana Shingle Recycling, LLC.

Photographer: Scott Chrysler (IDEM)

Date: August 7, 2024

Others Present: Dan Waltermann (IDEM) and Liesel Ray (Facility)

Location & Description: Section of Pile B1/B2 where material is being removed

# TIRE INVENTORY SITE DRAWING



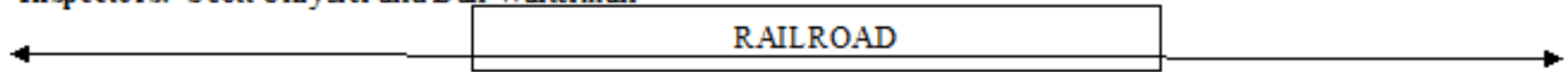
NOTE: Drawing not to scale

N

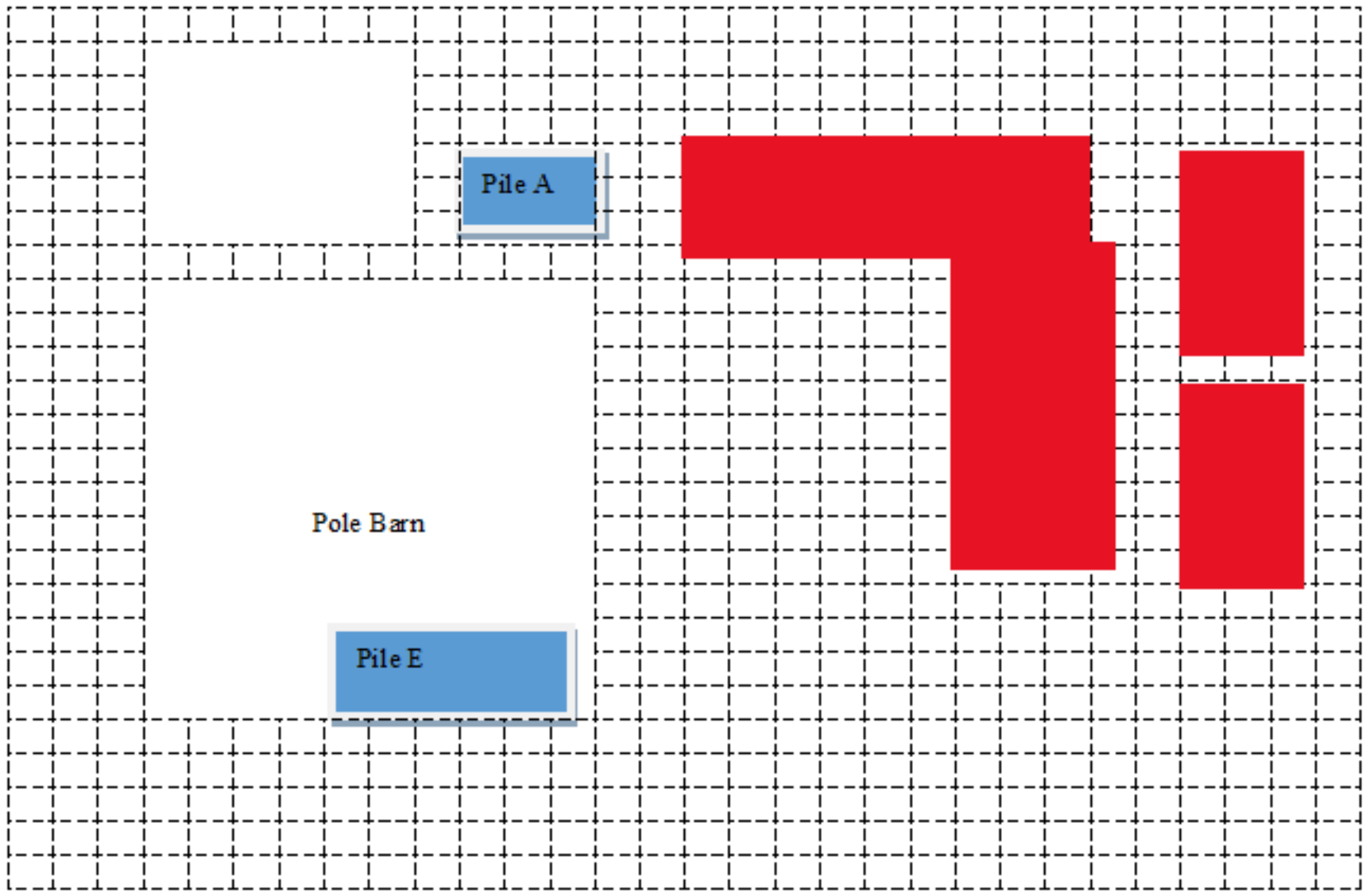
Site: Indiana Shingle Recycling, LLC

Date: August 7, 2024

Inspectors: Scott Chrysler and Dan Waltermann



Harding Street



## LEGEND

- Road
- Railroad
- Whole Shingles
- Ground Shingles
- Building

**From:** [Liesel Ray](#)  
**To:** [Martin, Bradley A](#)  
**Subject:** Re: Indiana Shingle Recycling LLC - Industrial Waste Inspection Report  
**Date:** Wednesday, August 7, 2024 2:18:54 PM  
**Attachments:** [image001.png](#)  
[image006.png](#)  
[image005.png](#)  
[image007.png](#)  
[image004.png](#)  
[image003.png](#)

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\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

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Received, thank you!

Liesel Ray

On Wed, Aug 7, 2024 at 2:18 PM Martin, Bradley A <[BAMartin@idem.in.gov](mailto:BAMartin@idem.in.gov)> wrote:

Attached is the Industrial Waste Inspection Report for Indiana Shingle Recycling LLC. Please respond to this email to confirm your receipt of this document.



Brad Martin

Administrative Assistant | Compliance Branch

Office of Land Quality

Indiana Department of Environmental Management

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(317) 234 6923 | [Bamartin@idem.IN.gov](mailto:Bamartin@idem.IN.gov)

