



5625 Old Porter Road
Portage, IN 46368



May 20, 2025

Self-Disclosure and Environmental Audit Administrator
Indiana Department of Environmental Management
Mail Code 60-02P
100 North Senate Avenue, IGCN 1301
Indianapolis, IN 46204-2251

To Whom It May Concern:

Enclosed is a Self-Disclosure and Environmental Audit form for Reworld Solutions, LLC, 5625 Old Porter Road, Portage, Indiana, Solid Waste Program ID 64-09. Verbal and written self-disclosed notification of the violation were also provided on April 29, 2025, to Trevor Willauer, IDEM Permit Manager.

If you have any questions or would like additional information please contact me at (920)379-8877.

Sincerely,

Sue Gau
Sr. EHS Manager

Enclosure

cc: Jennifer Breen, Sr. Legal Counsel
K.C. Wulf, Sr. Director of Operations
Dave Coughlin, Operations Manager

**SELF-DISCLOSURE AND ENVIRONMENTAL AUDIT**

State Form 55075 (8-12)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT (IDEM)

INSTRUCTIONS: A copy of IDEM's Self-Disclosure and Environmental Audit Policy can be obtained by visiting IDEM's website at http://www.in.gov/idem/files/npd_mp_004_r2.pdf. For questions on how to complete a self disclosure, please contact IDEM's Compliance and Technical Assistance Program: toll-free (within Indiana) at 1-800-451-6027, press 0 and ask for extension 2-8172 or 317/232-8172 or by email at ctap@idem.in.gov. Completed Self-Disclosures should be sent via certified U.S. Mail to:

Self-Disclosure and Environmental Audit Administrator
 Indiana Department of Environmental Management
 Mail Code 60-02P
 100 North Senate Avenue, IGCN 1301
 Indianapolis, Indiana 46204-2251

| FACILITY INFORMATION | | | | |
|---|-------------|-------------------|--|------------------|
| Name Reworld Solutions, LLC | | | Is the regulatory entity a new owner? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Physical Street Address (number and street) 5625 Old Porter Road | | | Is the facility a small regulated entity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| City Portage | State IN | ZIP Code 46368 | NAICS Code 562219 | SIC Code 4953 |
| IDEM Program ID(s) (i.e., Plant ID, NPDES, RCRA, FID, CAFO/Farm ID, PWSID, Source ID) Solid Waste Program ID 64-09 | | | | |
| Mailing Street Address (if different from physical address) | | | | |
| City | State | ZIP Code | Website | |
| AUTHORIZED CONTACT | | | | |
| <i>The authorized contact person is authorized by the entity to make such a disclosure and has authority to perform policy or decision-making functions of the company.</i> | | | | |
| Name K.C. Wulf | | | Job Title Sr. Director of Operations | |
| Email address KWulf@Reworldwaste.com | | | Telephone number (with area code) 414-397-6008 | |
| Contact Street Address (if different from physical and/or mailing address, please specify) | | | | |
| City | State | ZIP Code | Fax Number (with area code) | |
| VIOLATION(S) INFORMATION | | | | |
| <i>If more than one violation exists, each should be enumerated separately and described as completely as possible.</i> | | | | |
| Description of Violation: PLEASE SEE ATTACHED | | | | |
| How was the violation discovered? Employee completing an inventory of the 10-day hazardous waste transfer area. | | | Date the violation was discovered (month, day, year) April 28, 2025 | |

Physical location of the violation:
Reworld Solutions LLC
5625 Old Porter Road
Portage, IN 46368

Other Comments:

Verbal and written notification of the violation were provided on April 29, 2025 to Trevor Willauer, IDEM Permit Manager. Verbal and written notification of the situation were also provided to Waste Management Liberty Landfill on April 29, 2025.

CONDITIONS REQUIRED UNDER THE SELF-DISCLOSURE AND AUDIT POLICY

In addition to answering Yes/No, please provide a detailed explanation of how each of the 9 Audit Policy conditions have been met.

1. Was the violation discovered through an environmental audit or Compliance Management System?

If the violation was discovered through a Compliance Management System, provide information on how the System meets IDEM's requirement of "an objective, documented, systematic procedure or practice reflecting the [facility's] due diligence in preventing, detecting and correcting violations," including documentation as to how the facility implements its system. If applicable, include details regarding the facility's receipt of governmental or government supported compliance assistance.

Yes No

Explain: The violation was discovered when a routine inventory of the 10-day hazardous waste storage area was completed. The routine inventory is a practice implemented at the facility to prevent, detect and correct any discrepancies identified.

2. Was the violation identified voluntarily and not through a monitoring, sampling, or auditing procedure that is required by statute, regulation, permit, judicial or administrative order, or consent agreement? (See Policy for a regulated entity with a new owner.)

Yes No

Explain: The violation was identified voluntarily when an employee completed a routine inventory of the hazardous waste containers stored in the 10-day hazardous waste transfer area.

3. Was the disclosure prompt? The facility must demonstrate that the violation was disclosed within forty-five (45) days after it discovered the violation occurred or may have likely occurred.

Yes No

Explain: An investigation was completed on Monday, April 28, 2025 which revealed the IDEM Processing Permit violation. Verbal notification, followed by a written notification was provided to the IDEM on Tuesday, April 29, 2025.

4. Was the discovery and disclosure independent of a government or third party plaintiff? The facility must demonstrate that it took the initiative to find the violation and report it, rather than reacting to knowledge of a pending enforcement action or third party complaint.

Yes No

Explain: The violation was identified when an employee completed a routine inventory of the hazardous waste containers stored in the 10-day hazardous waste transfer area.

5. Was the violation corrected at the time of disclosure?

Yes No

If yes, provide a statement certifying that the violation has been corrected. If no, provide details of how the violation will be corrected within sixty (60) days after the date the facility notified IDEM of the violation. (See Policy if more than sixty (60) days are needed to correct the violation.)

I certify that corrective actions were immediately implemented and the violation has been corrected.

6. What measures are being taken to prevent recurrence of the violation and when will those measures be implemented?

PLEASE SEE ATTACHED.

7.a. Has the same (or closely related violation) occurred previously at this facility within the past three (3) years?

Yes No

Explain:

b. Has the violation (or closely related violation) occurred within the facility's parent organization within the past three (3) years?

Yes No

Explain:

PLEASE SEE ATTACHED.

8.a. Did the violation result in serious environmental harm or risk to human health?

Yes No

Explain:

b. Did the violation present an imminent and substantial endangerment to human health or the environment?

Yes No

Explain:

c. Was the violation knowingly, intentional or reckless such that it may constitute criminal conduct?

Yes No

Explain:

PLEASE SEE ATTACHED.

d. Was the violation inadvertent?

Yes No

Explain:

PLEASE SEE ATTACHED.

e. Did the violation violate the specific terms of any judicial or administrative order?

Yes No

Explain:

There are not judicial or administrative orders placed on the facility.

9. Has the regulated entity cooperated and provided information to IDEM as necessary and requested, to determine applicability of the Policy?

Yes No

Explain: All information requested by IDEM was provided to Mason Ellis, IDEM Environmental Manager.

Estimate of the cost of compliance: Minimal cost

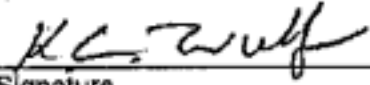
Basis of estimate:

CERTIFICATION

I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify, based upon reasonable investigation, that the submitted information is true, accurate and complete to the best of my knowledge and belief.

K.C. Wulf

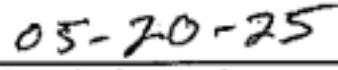
Name (printed)



Signature

Sr. Director of Operations

Title


Date (month, day, year)

Self-Disclosure and Environmental Audit

Reworld Solutions, LLC

SW Program ID 64-09

ATTACHMENT

Page 1, Violation Information, Description of Violation

On Friday, April 25, 2025, an inventory of hazardous waste stored in the 10-day hazardous waste transfer area was completed and three (3) containers could not be located. After completion of an investigation into the matter on Monday, April 28, 2025, it was discovered three containers of D001 hazardous waste had been inadvertently processed through the facility's solidification process, which is permitted to process only nonhazardous waste. The solidified waste, which contained the D001 waste, had been transported to the Waste Management Liberty Landfill on Friday, April 25, 2025.

Page 3, 6. What measures are being taken to prevent recurrence of the violation and when will those measures be implemented?

Corrective actions were immediately identified and implemented to include the placement of signage indicating the 10-day hazardous waste storage area, the nonhazardous waste QA/QC area, and nonhazardous waste staging area. Employee coaching was immediately completed with all employees involved in the permit violation. Standard Operating Procedures for waste receiving and shredding/solidification operations were reviewed and revised to ensure container labels are reviewed twice, once during receiving and again before transporting to the shredder for nonhazardous processing. All employees received training on the Standard Operating Procedures.

Page 3, 7.b. Has a Violation (or closely related violation) occurred within the facility's parent organization within the past (3) three years?

No

None of the Indiana Reworld facility have had this violation, or closely related violation occur within the past three years. The Reworld Indianapolis MPF, SW Program ID 49-64, received a Notice of Violation and Proposed Agreed Order, dated June 14, 2022, alleging the facility inadvertently processed P-listed waste. During an October 5, 2022, Settlement Conference with IDEM, Reworld provided documentation supporting the alleged violation did not occur. No further communication has been received from IDEM regarding this matter.

Page 3, 8.c. Was the violation knowingly, intentional reckless such that it may constitute criminal conduct?

No

Hazardous waste containers were unloaded from a delivery truck and placed on the south end of the loading dock. A load of nonhazardous containers was then unloaded from a different delivery

truck and staged on the west end of the loading dock, adjacent to the pallet of hazardous waste containers. The Processing Technician began loading the pallets of non-hazardous containers into the shredder and inadvertently thought the adjacent pallet of hazardous waste containers was part of the nonhazardous waste load and placed them into the shredder.

Page 3, 8.d. Was the violation inadvertent?

Yes

Hazardous waste containers were unloaded from a delivery truck and placed on south end of the dock. A load of nonhazardous containers was then unloaded from a different delivery truck and staged on the west end of the loading dock, adjacent to the pallet of hazardous waste containers. The Processing Technician began loading the pallets of non-hazardous containers into the shredder and inadvertently thought the adjacent pallet of hazardous waste containers was part of the nonhazardous waste load and placed them into the shredder.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • Fax (317) 233-6647 • www.idem.IN.gov

Mike Braun
Governor

Clint Woods
Commissioner

June 4, 2025

K.C Wulf
Reworld Solutions, LLC
5625 Old Porter Road
Portage, IN 46368

Via email: KWulf@reworldwaste.com

Re: Self-Disclosure of Potential Land
Violation
Reworld Solutions, LLC
5625 Old Porter Road
Portage, IN 46368

Dear K.C Wulf:

Thank you for your submission of Reworld Solutions, LLC. Self-Disclosure and Environmental Audit at the above-referenced facility. It is administratively complete.

I am forwarding your submission to the staff in the Office of Land Quality within the Indiana Department of Environmental Management (IDEM) for determination as to whether it meets IDEM's Self-Disclosure and Environmental Audit Policy, MP-004-R2- NPD.

For further assistance, you may contact Jennifer Reno, Office of Land Quality, at (317) 232-7207 or email at jreno@idem.in.gov, for questions pertaining to Land Quality Compliance.

Sincerely,

A handwritten signature in cursive script that reads "Samantha Nunnery".

Samantha Nunnery
Self-Disclosure and Environmental Audit
Administrator
Compliance and Technical Assistance Program
Indiana Department of Environmental Management

cc: Jennifer Reno, IDEM, Office of Land Quality