Received 5/14/2026

CleanEarth

May 13, 2026

Indiana Department of Environmental Management
Ms. Jenni Tegmeyer
Environmental Manager
Hazardous Waste Permits Branch
Office of Land Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Re: Clean Earth Request for Regulatory Interpretation for the Proposed Extruder Operations
Clean Earth Environmental Solutions, Inc.
Indianapolis, Indiana 46421

Dear Ms. Tegmeyer:

Clean Earth, a RCRA Permitted facility located at 2770 Fortune Circle East, Indianapolis, Indiana 46241, is formally requesting a regulatory interpretation from the Indiana Department of Environmental Management (IDEM) regarding the use of an extruder to process D002 consumer products. Specifically, "Is the use of an extruder to separate D002 liquids from their consumer packaging considered RCRA treatment subject to RCRA Subpart X and Subpart J permitting requirements?"

The facility proposes using an extruder to bulk D002 liquids from the corresponding consumer packaging into IBC totes. The containers will vary in size from a few ounces up to 5-gal pails. Prior to extrusion, the smaller consumer containers are packaged in DOT specification outer packaging that is appropriately marked and labeled per RCRA requirements, rather than providing RCRA markings and labels for each of the smaller inner consumer containers. The weight of the smaller inner corrosive D002 consumer products is tracked using a barcoding system and the facility's waste-tracking database.

The D002 consumer products will be counted and weighed as they are de-packed and placed into the extruder, where they are punctured and compressed (extruded) to separate the D002 liquid from the containers. A new barcode label is created for each IBC tote, tracking the original generator's information and the weight of waste transferred into the IBC tote. The punctured / crushed containers from the end of the extruder are forced up a stainless-steel chute into a bin. The crushed containers are managed as a new waste stream, evaluated for RCRA hazardous waste characteristics, and disposed of accordingly.

A chemical-resistant diaphragm pump and hose will continually pump the D002 liquid from a stainless-steel collection tray at the bottom of the extruder through a stainless-steel screen into a compatible DOT IBC tote. The extruder will run on a batch system and be

decontaminated/emptied once the batch is complete or at the end of the day. The extruder will not store or accumulate hazardous waste.

Sincerely,

CLEAN EARTH ENVIRONMENTAL SOLUTIONS, INC.

on behalf of:

Jody Mathers, Permitting Compliance Manager
Clean Earth Environmental Solutions, Inc.

Summary of how consumer waste is managed at the facility.

The facility manages several types of waste and non-waste materials.

1. Solid Waste:

   The facility uses two barcode systems (Steritrack and Core) to track solid waste managed on-site (please see bullet point 3 for the system breakdown). To reduce the amount of material sent to a solid waste (Subtitle D) landfill and/or a waste-to-energy facility, Clean Earth provides a service that collects out-of-date or otherwise discarded non-RCRA-regulated liquid consumer products. Clean Earth then separates the liquids from the consumer packaging using an extruder. The liquids are pumped from the extruder into a tote for reuse, recycling, or disposal. Crushed packaging is evaluated as a new waste stream and managed appropriately.

2. RCRA 10 Day:

   The facility operates a RCRA 10-day transfer facility for those wastes that will not be processed or otherwise handled by the facility. Hazardous Waste managed in the 10-day transfer areas remains under the initial Hazardous Waste Manifest. The "designated facility" (Box 8 on the manifest) will be a TSDF facility other than Clean Earth Indianapolis. The 10-day hazardous waste containers remain on the initial hazardous waste manifest during transportation and are not subject to the Hazardous Waste Permit. These waste containers will only be stored in the designated 10-day transfer area.

3. RCRA Hazardous Waste

   The facility uses two barcode systems (Steritrack and Core) to track hazardous waste managed at the facility. Containers of hazardous waste that are not to be consolidated or bulked together will be barcoded and placed into one of the existing permitted storage areas. The remainder of this section discusses how the barcode systems are used to track consumer product hazardous waste.

   a. The **Core** system is used in the field (at the customers' locations) to enter data for each outer packaging, shrink wrap, loose pack, or strong packaging (collectively called SPAK) into which consumer products are placed. Once a SPAK is full, the Core database entry for that package is marked complete, and the corresponding barcode tracking label is printed and applied to the SPAK. The information entered into the Core system linking to the container's barcode label includes:

i. Clean Earth profile/approval number, Generator Information, manifest number, outer container ID, weight of the generator's consumer products placed in the outer package, date packaged, and shipped.
ii. Individual containers and their weights are not tracked; only the total weight of the consumer products placed in the SPAK is tracked for each generator location. For example, a SPAK may have 200 lbs of D002 from generator A and 300 lbs of D002 products from generator B for a total of 500 lbs in that SPAK
iii. All consumer products are evaluated for compatibility before they are combined in a SPAK.
iv. The SPAK will be managed as a DOT / RCRA container with the appropriate markings and labels. The inner containers are not managed individually as RCRA containers.
v. The facility plans to change over all waste stream profiles, approval, and tracking to the Core system sometime in 2027. Until that time the facility will continue to use the Steritrack system as described in the following paragraph.

b. The Steritrack database is the original system used by the facility to track waste stream profiles and approvals. Hazardous Waste consumer products are packaged into SPAKs, weighted, and shipped on a hazardous waste manifest by the generator to the facility. Once the container arrives at the facility, the facility staU' confirm the waste profile approval, then print and place the waste barcode label on the container with the appropriate information for that waste stream. Information tracked via the barcode includes:
    i. Clean Earth waste profile, generator name/info, the weight of the waste, the initial manifest number, the initial container ID, the container it was bulked into, the final manifest, and the destination TSDF facility. Date received, date bulked, and date shipped to the final destination facility.
c. Receiving, staging (storage), depacking, and consolidation (Extruder)
    i. Hazardous manifests are terminated upon the waste being received by the facility. Clean Earth takes owner / generator status of all of the hazardous waste received by the facility. Only hazardous waste managed in the 10-day transfer area maintains the original generator's information and manifest.
    ii. Containers of hazardous waste that will not be consolidated using the extruder will be placed in one existing permitted storage areas.

Consumer products in SPAKs to be consolidated will be staged/stored in the new CPA-2 storage area prior to consolidating the liquid D002 into a DOT tote using the extruder. Waste streams will be consolidated in a batch system. The barcode system identifies the SPAK containers to be processed in each batch. All consumer products in a batch will have been evaluated, confirmed to be compatible, and tracked using the barcode system.

iii. A new Core/ Steritack entry and barcode label will be created for each new DOT IBC tote into which materials are consolidated. Each SPAK is de-packaged and inventoried to confirm the weight assigned to each generator prior to being placed into the extruder and transferred into the new IBC Tote. The initial generator information, initial manifest number, weight, and Clean Earth waste approval information are tracked to the new IBC tote using the Core or Steritrack database.

iv. By using the barcode database system, Clean Earth can track the initial generator's information, waste, and initial manifest, which is consolidated into a specific Clean Earth IBC Tote. The system also tracks that tote's shipment on a hazardous waste manifest to its final destination, documenting the cradle-to-grave tracking of each generator's waste.

d. Crushed Container. The crushed and punctured containers will be managed as a new solid waste stream and potentially hazardous waste. The crushed and punctured container waste stream will be evaluated for RCRA characteristics and managed accordingly.

4. Other
   a. Hand sanitizers and perfumes are managed under the ethanol exemption from RCRA. Barcode tracking of these products is conducted in the same manner as the hazardous and solid waste.
   b. Universal Wastes are managed under 40 CFR 273. Barcode tracking of these wastes is conducted in the same manner as the hazardous and solid waste.