



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 28, 2024

VIA EMAIL

Mr. Roy Cooper
OSH Manager
MM Packaging
6454 Saguaro Ct
Indianapolis, In 46268

Re: Violation Letter
MM Packaging
IND985096221
Indianapolis, Marion County

Dear Mr. Cooper:

On 6/24/2024, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of MM Packaging, located at 6454 Saguaro Ct, Indianapolis, IN. 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: Compliance Evaluation Inspection

Results of Inspection: Violations were discovered and require a submittal.

Within thirty (30) days of receipt of this letter, a written detailed explanation, documenting compliance with each of the requirements listed in the inspection report, must be submitted to this office. Failure to respond adequately to this Violation Letter may result in a referral to the OLQ Enforcement Section. Please direct any response to this letter and any questions to Samantha Shafer at 317-447-0351 or sshafer@idem.in.gov. Thank you for your attention to this matter.

Sincerely,

Susan Lowry
Section Chief
Hazardous Waste Compliance Section
Compliance Branch

Enclosure

cc: Marion County Health Department



**HAZARDOUS WASTE
INSPECTION REPORT**
INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

Inspector's Name:	Samantha Shafer	
Others Present	Matt Peterschmidt	Senior Environmental Manager
Date:	Monday, June 24, 2024	
Time In:	9:50 AM	
Time Out:	1:00 PM	
Inspection Type	Compliance Evaluation Inspection	

General Information

Facility Information	
Facility Name	MM Packaging
Facility Location	6454 Saguaro Ct Indianapolis, IN 46268 Marion County
Facility Mailing Information	Same Address as Facility
Facility Contact	Same as Primary Facility Contact
Primary Facility Contact During Inspection	Roy Cooper OSH Manager 317-417-1031 roye.cooper@mm.group
Other Facility Contact(s) During Inspection	N/A

Facility ID			
EPA ID Number	IND985096221	NAICS Code	323111

Facility Status			
File Status	Very Small Quantity Generator	Other Activities	Episodic Generation

Outstanding Issues	
Last Inspection Date	
Previous Violations	<input type="radio"/> Yes <input checked="" type="radio"/> No
Details	

Inspection Narrative

On 6/24/24, IDEM inspectors Samantha Shafer and Matt Peterschmidt arrived at MM Packaging to conduct a routine compliance evaluation inspection (CEI). This inspection was prompted by the episodic generation that this location has been notifying for since 2021. This location was previously known as Essentra, with MM Packaging taking over in 2022.

MM packaging provides offset and flexographic printing for the pharmaceutical industry. Items printed include the directions and labels for medications. With a workforce of 107 employees operating on three shifts 24/7, the building spans 125,000 square feet. This location has been notified as a VSQG since 2020, with the most recent notification being 01/23/2024. Upon arrival, IDEM inspectors met with Roy Cooper (OSH Manager) and began an opening conference to discuss the inspection itinerary for the day.

The inspection itinerary for the day consisted of an opening conference, a facility tour, a document(s) review, and a closing conference.

During the opening conference, Mr. Cooper explained to inspectors that a planned episodic event is held annually at MM packaging to get rid of waste ink. The ink that is used on site has a shelf life of one year, so MM packaging has a routine

clean out take place every year. According to records on site, the episodic event that took place in 2022 began on 5/13/22 and ended on 7/11/22, the event in 2023 began on 6/05/23 and ended on 8/01/23, and the event in 2024 began on 2/26/24 and ended on 4/19/24. Based on the observations during the inspection and the records retained on site, MM packaging's planned episodic events have been managed accordingly.

During the facility tour, IDEM staff inspected areas 1-8 (see attached map).

In area 1, inspectors noted two forty (40) gallon parts washer. Each washer is serviced once per month. The aqueous parts washer is serviced by Cintas while the parts washer containing mineral spirits is serviced by Crystal Clean. The mineral spirits are processed under Crystal Clean's reuse program, therefore it does not count towards MM Packaging's hazardous waste generation. There is a satellite area here for used oil, waste aerosols, and waste ink.

In area 2, there is a printing press that produces aluminum plates. These plates are used for individual printing jobs and then recycled through J. Solotken and Co. Platemaker waste is produced from this machine at a rate of twenty (20) liters every two weeks. Documentation could not be provided regarding this waste, therefore IDEM has asked for a waste determination (see DOV for details).

Area 2 is also the area where excluded solvent-contaminated wipes are staged for pick up. MM packaging uses these wipes to clean ink (D021) between printing jobs. Six (6) 55-gallon containers of solvent-contaminated wipes were noted in this area and violations were discovered (see DOV for details).

The onsite document review consisted of manifests, LDRs, SDS's, and episodic generation information. An offsite document review of annual/biennial reports was conducted prior to the inspection. Violations were discovered during the document(s) review (see DOV for details).

During the closing conference, Mr. Cooper was given a verbal summary of the day's inspection and violations. Violations were discovered and require a submittal from you to sshafer@idem.in.gov within 30 days of the receipt of this report.

Regulatory Status			
Observed Activity	Very Small Quantity Generator	Other Activities	Used Oil Generator Universal Waste Handler
Documents Reviewed	Manifests Land Disposal Notification SDS's Episodic Generation Information		
Comments			

Waste Management				
Comments:				
Waste Stream(s) Information				
Waste Streams				
<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Inspected <input type="radio"/> Not Applicable				
List waste stream(s) information that varies from the most recent Annual Report (Example: additional waste streams, waste streams no longer generated, significant increase/decrease in generation rate, etc.)				
EPA Waste Codes	Description	Source	Generation Rate	Disposition
D021	Waste ink	Expired ink	Episodic	EQ Detroit, Inc
D021	Waste ink	Expired ink	10 gallons/month	EQ Detroit, Inc
Non-hazardous	Autowash 9000	Flushing	2,000 lbs/month	Harsco
Non-hazardous	Parts washer (mineral spirits)	Parts washer (mineral spirits)	40 gallons/month	Crystal Clean
Non-hazardous	Aqueous parts washer	Aqueous parts washer	40 gallons/month	Cintas

Non-hazardous	Waste glue	Excess glue from production	2-3 55-gallon drums/year	Harsco
Non-hazardous	Cardboard	Printing process	Varies	Quincy Recycle
Non-hazardous	Used oil	Maintenance	1 55-gallon drum/year	GFL Environmental
Non-hazardous	Paper	Printing process	Varies	Quincy Recycle
D001	Aerosols	Anti-static spray for printing	3-4 55-gallon drums/year	ISG Transportation
Universal Waste	Fluorescent bulbs	Maintenance	One 4 ft box/year	Lighting Resources
Unknown	Platemaker waste	Aluminum plate making	20 liters/two (2) weeks	Unknown

Exempted/Excluded Yes No Not Inspected Not Applicable

Explanation
 Scrap aluminum recycled by J. Solotken and Co excluded under 40 CFR 261.4(a)(13) and contaminated solvent-excluded wipes sent for laundering via Cintas under 40 CFR 261.4(a)(26)

Waste Management Areas

Container Management Area(s) Yes No Not inspected Not applicable

EPA Waste Codes	Location	Number	Size	Type of Container
Platemaker waste	Area 2	4	20L	Plastic
Excluded solvent wipes	Area 2	6	55-gallon	Steel
Non-hazardous (waste glue)	Area 7	1	55-gallon	Steel
Universal waste bulbs	Area 7	1	4 ft	Fiber
Scrap Metal	Area 3	1	48x48x48	Gaylord
Excluded solvent wipes	Area 2	1	30-gallon	Steel
Excluded solvent wipes	Area 3	2	30-gallon	Steel

Satellite Area(s) Yes No Not inspected Not applicable

EPA Waste Codes	Location	Comments
Non-hazardous (waste glue)	Area 6	One 55-gallon container not yet full
D001	Area 1	One 55-gallon container ½ full
Used oil	Area 1	One 55-gallon container ½ full
D021	Area 1	One 55-gallon container ¼ full

Tanks, Restricted Waste Sites, and Other Regulated Units
 Yes No Not inspected Not applicable

Environmental Releases

Visible Releases/Contamination/Discharges	<input type="radio"/> Yes <input checked="" type="radio"/> No Release Observed

Compliance Assistance	
P2 Information	
The following P2 suggestions could possibly save money, reduce waste and/or minimize risk. You might consider having a P2 assessment, or a voluntary technical assistance consultation from IDEM staff. Please visit the agency's P2 web site at http://www.in.gov/idem/5298.htm for additional information.	
Contact by IDEM OPPTA Requested	<input type="radio"/> Yes <input checked="" type="radio"/> No
P2 Suggestions	

Guidance Materials	
Guidance Materials Provided to Facility	Universal Waste Label

Checklist (Checked box indicates a compliance concern)	
Standards <input checked="" type="checkbox"/> Hazardous Waste Determination <input type="checkbox"/> Recordkeeping (SQG and LQG) <input type="checkbox"/> Identifying Hazardous Waste Numbers (SQG and LQG) <input type="checkbox"/> Generator Category Determination <input type="checkbox"/> Notification (SQG, LQG, Transporter, TSDF) <input type="checkbox"/> Release to the Environment, Disposal of Solid Waste <input type="checkbox"/> Illegal Dumping <input type="checkbox"/> Other Violation	TSDF Permit Requirements <input type="checkbox"/> TSDF Permit Requirements <input type="checkbox"/> Other Violation

LQG Hazardous Waste Standards <input type="checkbox"/> Accumulate for 90 Days or Less <input type="checkbox"/> Container Condition <input type="checkbox"/> Compatibility of Waste with Container <input type="checkbox"/> Containers Closed <input type="checkbox"/> Container Handling <input type="checkbox"/> Central Accumulation Area Inspection <input type="checkbox"/> Ignitable or Reactive Wastes - Distance from Property Line <input type="checkbox"/> Ignitable or Reactive Wastes - Sources of Ignition/Reaction: "No Smoking" signs <input type="checkbox"/> Conditions for Accumulation of Incompatible Wastes <input type="checkbox"/> Container Labeled "Hazardous Waste"	SQG Hazardous Waste Standards <input type="checkbox"/> Accumulate for 180 Days or Less <input type="checkbox"/> Accumulation Limit <input type="checkbox"/> Container Condition <input type="checkbox"/> Compatibility of Waste with Container <input type="checkbox"/> Containers Closed <input type="checkbox"/> Container Handling <input type="checkbox"/> Central Accumulation Area Inspections <input type="checkbox"/> Conditions for Accumulation of Incompatible Wastes <input type="checkbox"/> Container Labeled "Hazardous Waste" <input type="checkbox"/> Container Marked with Indication of Hazards <input type="checkbox"/> Container Marked with Accumulation Start Date <input type="checkbox"/> Tank Operating Conditions
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<ul style="list-style-type: none"> <input type="checkbox"/> Container Marked with Indication of Hazards <input type="checkbox"/> Containers Marked with Accumulation Start Date <input type="checkbox"/> Tank Integrity Assessment <input type="checkbox"/> Tank Containment and Detection of Releases <input type="checkbox"/> Tank General Operating Requirements <input type="checkbox"/> Tank Inspections <input type="checkbox"/> Tank Subpart BB - Monthly Pump and Valve Monitoring <input type="checkbox"/> Tank Subpart CC - Annual Inspection/Monitoring <input type="checkbox"/> Tank Labeled "Hazardous Waste" <input type="checkbox"/> Tank Marked with Indication of Hazards <input type="checkbox"/> Tank Documentation for 90-Day Accumulation <input type="checkbox"/> Maintenance and Operation of Facility <input type="checkbox"/> Required Equipment <input type="checkbox"/> Testing and Maintenance of Equipment <input type="checkbox"/> Aisle Space <input type="checkbox"/> Arrangements with Local Authorities <input type="checkbox"/> Arrangements with Local Authorities - Documentation <input type="checkbox"/> Contingency Plan Developed <input type="checkbox"/> Content of Contingency Plan <input type="checkbox"/> Copies of Contingency Plan <input type="checkbox"/> Contingency Plan Quick Reference Guide <input type="checkbox"/> Emergency Coordinator <input type="checkbox"/> Personnel Training Program <input type="checkbox"/> Personnel Training - Complete Within Six Months <input type="checkbox"/> Personnel Training Annual Review <input type="checkbox"/> Personnel Training Documentation <input type="checkbox"/> Personnel Training Record Retention <input type="checkbox"/> Notification for Closure <input type="checkbox"/> Land Disposal Restrictions <input type="checkbox"/> Large Quantity Generator - Other Violations 	<ul style="list-style-type: none"> <input type="checkbox"/> Tank Inspections <input type="checkbox"/> Tank Labeled "Hazardous Waste" <input type="checkbox"/> Tank Marked with Indication of Hazardous <input type="checkbox"/> Tank Documentation for 180-Day Accumulation <input type="checkbox"/> Land Disposal Restrictions <input type="checkbox"/> Maintenance and Operation of Facility <input type="checkbox"/> Required Equipment <input type="checkbox"/> Testing and Maintenance of Equipment <input type="checkbox"/> Access to Communications or Alarm System <input type="checkbox"/> Aisle Space <input type="checkbox"/> Arrangements with Local Authorities <input type="checkbox"/> Arrangements with Local Authorities - Documentation <input type="checkbox"/> Emergency Coordinator <input type="checkbox"/> Emergency Information Posted <input type="checkbox"/> Employee Training <input type="checkbox"/> Other Small Quantity Generator Standards <p>VSQG Standards</p> <ul style="list-style-type: none"> <input type="checkbox"/> Hazardous Waste Generation Limit <input type="checkbox"/> Hazardous Waste Accumulation Limit <input type="checkbox"/> Hazardous Waste Determination <input type="checkbox"/> Proper Disposal <input type="checkbox"/> Prohibited Disposal of Liquids in Landfills
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<p>Satellite Accumulation – SQG and LQG</p> <ul style="list-style-type: none"> <input type="checkbox"/> Quantity Limits, Point of Generation, Under Control of Operator <input type="checkbox"/> Container Condition <input type="checkbox"/> Compatibility with Container <input type="checkbox"/> Incompatible Wastes 	<p>Manifest and Recordkeeping - LQG and SQG</p> <ul style="list-style-type: none"> <input type="checkbox"/> Manifest General Requirements <input type="checkbox"/> Use of the Manifest
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<input type="checkbox"/> Containers Closed <input type="checkbox"/> Container Labeled "Hazardous Waste" <input type="checkbox"/> Container Marked with Indication of Hazards <input type="checkbox"/> Preparedness and Prevention <input type="checkbox"/> Excess Generation	
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Episodic Generation <input type="checkbox"/> Notification <input type="checkbox"/> EPA ID Number <input type="checkbox"/> Accumulate for 60 Days or Less <input type="checkbox"/> Accumulation Prohibitions <input type="checkbox"/> Container Labeling <input type="checkbox"/> Tank Labeling and Recordkeeping <input type="checkbox"/> Recordkeeping <input type="checkbox"/> Preparedness and Prevention <input type="checkbox"/> Other Violation	Hazardous Secondary Materials <input type="checkbox"/> Reclaimed Under Control of the Generator <input type="checkbox"/> Contained <input type="checkbox"/> Speculative Accumulation <input type="checkbox"/> Notice <input type="checkbox"/> Documentation of Legitimacy Determination <input type="checkbox"/> Emergency Preparedness and Response <input type="checkbox"/> Emergency Procedures (Accumulates 6,000 kg or Less) <input type="checkbox"/> Emergency Procedures (Accumulates Greater than 6,000 kg) <input type="checkbox"/> Other Violation
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Solvent-Contaminated Wipes – Disposal <input type="checkbox"/> Container Management (Non-leaking containers) <input type="checkbox"/> Closed Containers <input type="checkbox"/> Labeling <input type="checkbox"/> Accumulation Time <input type="checkbox"/> No Free Liquids <input type="checkbox"/> Free Liquids Management <input type="checkbox"/> Documentation <input type="checkbox"/> Final Disposition	Solvent-Contaminated Wipes - Laundered or Dry Cleaned <input type="checkbox"/> Container Management (Non-leaking containers) <input checked="" type="checkbox"/> Closed Containers <input checked="" type="checkbox"/> Labeling <input type="checkbox"/> Accumulation Time <input type="checkbox"/> No Free Liquids <input type="checkbox"/> Free Liquids Management <input checked="" type="checkbox"/> Documentation <input type="checkbox"/> Clean Water Act
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Universal Waste – All Facilities <input type="checkbox"/> Universal Waste Labeling <input type="checkbox"/> Containers - Closed, Good Condition, No Evidence of Leaks <input type="checkbox"/> Universal Waste - Bulb Crushing Prohibition	Used Oil – All Facilities <input type="checkbox"/> Rebuttable Presumption Applies <input type="checkbox"/> Containers and Tanks in Good Condition <input type="checkbox"/> Containers/Tank Labeling <input type="checkbox"/> Release Clean Up and Containment <input type="checkbox"/> Burning Restrictions - Generated On-site or DIY, .5M BTU
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Description of Violation(s)
STANDARDS
HAZARDOUS WASTE DETERMINATION

CITATION:

40 CFR 262.11: A person who generates a solid waste must determine if that waste is a hazardous waste.

DETAILS:

In area 2, there is a printing press that produces aluminum plates. These plates are used for individual printing jobs and then recycled through J. Solotken and Co. Platemaker waste is produced from this machine at a rate of twenty (20) liters every two weeks. Documentation could not be provided regarding this waste, therefore IDEM has asked for a waste determination.

REQUIRED ACTION:

Determine whether the aforementioned waste is hazardous as defined by 40 CFR 261. Submit the result via email to sshafer@idem.in.gov within 30 days of the receipt of this report.

CLOSED CONTAINERS**CITATION:**

40 CFR 261.4(a)(26)(i) (Closed Containers): Solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes from the point of generation, provided that the solvent-contaminated wipes, when accumulated, stored, and transported, are contained in closed containers. During accumulation, a container is considered closed when there is complete contact between the fitted lid and the rim, except when it is necessary to add or remove solvent-contaminated wipes. When the container is full, or when the solvent-contaminated wipes are no longer being accumulated, or when the container is being transported, the container must be sealed with all lids properly and securely affixed to the container and all openings tightly bound or closed sufficiently to prevent leaks and emissions.

DETAILS:

Five (5) drums of excluded solvent-contaminated wipes located in area 2 were not properly closed at the time of inspection (see photos 1-4).

The violations were corrected on site besides one 55-gallon drum which was unable to be closed at the time of inspection due to a faulty lid.

REQUIRED ACTION:

Close, and keep closed, all containers holding solvent-contaminated wipes except when it is necessary to add or remove solvent-contaminated wipes. Once the container is full, is no longer being accumulated, or is being transported, the container must be sealed with lids secure and all openings tightly bound or closed. Submit proof of closure for the one 55-gallon drum of excluded solvent-contaminated wipes to sshafer@idem.in.gov within 30 days of the receipt of this report.

LABELING**CITATION:**

40 CFR 261.4(a)(26)(i) and 329 IAC 3.1-6-2(13) (Labeling): Solvent-contaminated wipes that are sent for cleaning and reuse are not solid wastes from the point of generation, provided that the solvent-contaminated wipes, when accumulated, stored, and transported, are labeled "Excluded Solvent-Contaminated Wipes" or with other words indicating the contents of the container.

DETAILS:

Five (5) drums of excluded solvent-contaminated wipes located in area 2 were not labeled with the words "excluded solvent-contaminated wipes" (see photos 1-4).

The violations were corrected on site.

REQUIRED ACTION:

In the future, label all excluded solvent-contaminated wipes as "Excluded Solvent-Contaminated Wipes" or with other words to identify the contents.

DOCUMENTATION**CITATION:**

40 CFR 261.4(a)(26)(v)(A), (B), and (C) (Documentation): Generators must maintain at their site the following documentation: the name and address of the laundry or dry cleaner that is receiving the solvent-contaminated wipes; documentation that the 180-day accumulation time limit in 40 CFR 261.4(a)(26)(ii) is being met; and a description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of being laundered or dry cleaned on-site or at the point of being transported off-site for laundering or dry cleaning.

DETAILS:

At the time of inspection, MM packaging did not have a description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of being laundered or dry cleaned on-site or at the point of being transported off-site for laundering or dry cleaning.

REQUIRED ACTION:


Maintain on-site a description of the process the generator is using to ensure the solvent-contaminated wipes contain no free liquids at the point of being laundered or dry cleaned on-site or at the point of being transported off-site for laundering or dry cleaning. Submit this documentation to sshafer@idem.in.gov within 30 days of the receipt of this report.


Inspection Documentation	
Photographs	<input checked="" type="radio"/> Yes <input type="radio"/> No
Map	<input checked="" type="radio"/> Maps
GPS Location Collected	<input type="radio"/> Yes <input checked="" type="radio"/> No
Analytical Screening Conducted	<input type="radio"/> Yes <input checked="" type="radio"/> No
Lab Sample	<input type="radio"/> Yes <input checked="" type="radio"/> No

Inspection Results/Actions	
Comments:	
Inspection Results	
Violations were discovered and require a submittal.	
Multi-Media Concerns	
No concerns noted	

Finalize Inspection	
Written Summary of Inspection	Notice of Inspection and Verbal Summary Provided
Inspector Information	Printed/Typed Name: Samantha Shafer
	Phone Number: 317-447-0351
	Email Address: sshafer@idem.in.gov
	Signature: Obtained on the Inspection Verification/Findings Form
Facility Representative Signature	Printed/Typed Name: Roy Cooper
	Signature: Obtained on the Inspection Verification/Findings Form

Photo Table: MM Packaging

	Number	1
	Description	<p>Five (5) 55-gallon drums of excluded solvent-contaminated wipes. Four (4) of these drums were not labeled with the words “excluded solvent-contaminated wipes” and were not properly closed.</p> <p>Location: Area 2</p>
	Photographer	Samantha Shafer
	Facility Name	MM Packaging
	Photo Date	06/24/2024
	Others	<p>Matt Peterschmidt- IDEM Roy Cooper- MM Packaging</p>

	Number	2
	Description	<p>One (1) drum of excluded solvent-contaminated wipes were not labeled with the words “excluded solvent-contaminated wipes” and was not properly closed.</p> <p>Location: Area 2</p>
	Photographer	Samantha Shafer
	Facility Name	MM Packaging
	Photo Date	06/24/2024
	Others	<p>Matt Peterschmidt- IDEM Roy Cooper- MM Packaging</p>



Number	3
Description	The violation referenced in photo 2 was corrected on site. Location: Area 2
Photographer	Samantha Shafer
Facility Name	MM Packaging
Photo Date	06/24/2024
Others	Matt Peterschmidt- IDEM Roy Cooper- MM Packaging



Number	4
Description	The violations referenced in photo 1 were corrected on site besides one 55-gallon drum which was unable to be closed at the time of inspection due to a faulty lid. Location: Area 2
Photographer	Samantha Shafer
Facility Name	MM Packaging
Photo Date	06/24/2024
Others	Matt Peterschmidt- IDEM Roy Cooper- MM Packaging



Number	5
Description	<p>One (1) 55-gallon container of universal waste aerosols was not labeled with words to describe the contents.</p> <p>A label was provided by IDEM and the violation was corrected on site.</p> <p>Email correspondence following the inspection with the facility contact Mr. Cooper revealed that MM packaging does not manage their aerosols as universal waste, therefore, the violation cited during the inspection no longer applies.</p> <p style="text-align: right;">Location: Area 1</p>
Photographer	Samantha Shafer
Facility Name	MM Packaging
Photo Date	06/24/2024
Others	<p>Matt Peterschmidt- IDEM Roy Cooper- MM Packaging</p>



INSPECTION VERIFICATION/FINDINGS

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue
Indianapolis, Indiana 46204-2251
Telephone: (800) 451-6027 or (317) 232-8603
Web Page: http://www.in.gov/idem/

On 6/24/24 an inspection of M M Packaging was conducted by the undersigned representative of the Indiana Department of Environmental Management (IDEM), Office of Land Quality.

Type of Inspection (may include more than one):

- Checkboxes for Routine Compliance Evaluation, Follow Up Inspection, Compliance Assistance Inspection, Complaint, Multi-Media Screening Evaluation, and Other: Episodic Generation

Inspection Findings:

These findings are considered preliminary and identify specific compliance issues discovered during the above-noted inspection that the designated agent of IDEM believes may be a violation of a statute(s), rule(s) or permit(s) issued by IDEM.

- Checkboxes for No violations were discovered, Violations were discovered but corrected during the inspection, Violations were discovered and require a submittal from you and/or follow-up inspection by IDEM, Violations were discovered and may subject you to an appropriate enforcement response, Additional information/review is required to evaluate overall compliance, and Other/Comments (attachment may be included):

Confidential Information

In accordance with 329 IAC 6.1 (http://www.in.gov/legislative/iac/T03290/A00061.PDF) a person submitting information to the department for which confidential treatment is requested shall make a written claim of confidentiality at the time of submittal of the information. A person may request confidential treatment of information at the time the information is acquired through the actions of the department, such as inspections. The written claim for confidential treatment may be broad, but must be sufficiently clear to allow for accurate identification of the information claimed to be confidential. In accordance with 329 IAC 6.1-4-1(d), supporting information must be submitted to the commissioner within five (5) working days from the time the information claimed as confidential is acquired by the department. A person submitting a claim of confidentiality shall designate and segregate the information and the supporting information to which the claim applies in a manner that is sufficiently clear to allow the department to identify all confidential claim materials. Confidential information may include (but is not limited to) written or printed material, maps, charts, photographs, or samples (see definition of information at 329 IAC 6.1-2-8). The undersigned Owner/Representative has alleged information acquired during this inspection [] does [X] does not (check one) contain confidential information. A check in the "does" box is not a written claim for confidential treatment of information acquired during this inspection.

Notice of Oral Report

In accordance with IC 13-14-5 an oral report of the inspection was provided to the undersigned Owner/Agent at the conclusion of the inspection. The oral report includes any specific matters discovered during the inspection that the IDEM representative believes may be a violation of a law or of a permit issued by the department. The report does not include matters not evident to the IDEM representative or any fact that indicates an intentional, a knowing, or a reckless violation.

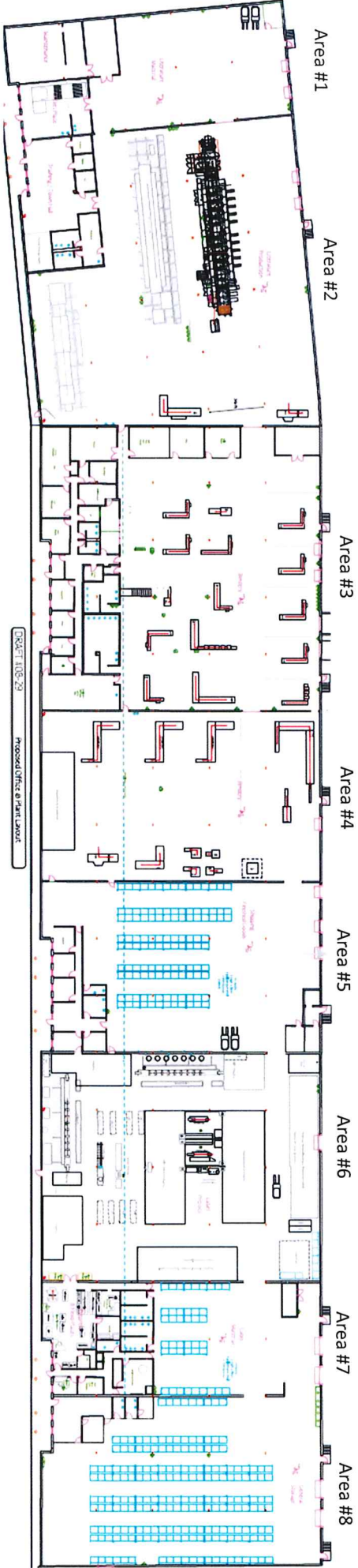
IDEM Representative:

Signature and contact information for Samantha Shafer, including printed name, signature, date (6/24/24), phone number (317-447-0391), email (sshater@idem.in.gov), and time in/out (9:50am/1:00pm).

Owner/Representative:

Signature and contact information for Roy Cooper, including printed name, signature, title (HSE Manager), phone number (317-417-1031), email (ROYE.COOPER@MM.GROUP), and date (06/24/2024).

IDEM prefers to email your report. Please check this box to indicate you prefer to receive a copy of the inspection report via U.S. mail: []



PROPOSED OFFICE FLOOR LAYOUT

PROJECT FIGURE 23

From: [Shafer, Samantha](#)
To: [Cooper Roy E](#)
Subject: RE: RCRA Inspection 6/24
Date: Friday, June 28, 2024 8:03:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)
[image005.png](#)

Roy,

Thank you again for your communication following the inspection. Since we adhere to a timeliness metric, you will be asked to perform a waste determination on your platemaker waste due to the failure to provide documentation during and following the inspection. You will be able to submit the results of this determination to me following the receipt of the report.

Have a good rest of your day!

Thanks,



Samantha Shafer (she/they)
Environmental Manager
Hazardous Waste Compliance | Office of Land Quality
Indiana Department of Environmental Management

(317) 447-0351 sshafer@idem.in.gov

From: Cooper Roy E <RoyE.Cooper@mm.group>
Sent: Thursday, June 27, 2024 10:19 AM
To: Shafer, Samantha <SShafer@idem.IN.gov>
Subject: Re: RCRA Inspection 6/24

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

1. Have you determined these aerosols to be hazardous or non-hazardous waste? **Attached are the SDSs for 3 aerosol; they are hazardous but we exhaust them completely**
2. What do you do with your aerosol cans that clog up and cannot be emptied? **Aerosol do not clog are able to be discharged 100%**
3. What happens to any residual solvent from the puncturing of the cans done by ISG? **No residuals**

Roy Cooper

HSE Manager
Health & Safety

317-417-1031

6454 Saguaro Court

Indianapolis, Indiana 46268

United States

RoyE.Cooper@mm.group

<https://www.mm.group>

MM Packaging US, Inc

Registered Number: 51-0299429

Registered in Delaware, USA

Registered Office: Corporation Trust Center, 1209 Orange Street, Wilmington, New Castle, 19801, United States

CONFIDENTIALITY NOTICE

The contents of this e-mail message and any attachments may contain confidential and/or privileged information intended only for the addressee(s). If this message has been addressed to you in error, please inform the sender immediately by reply mail and delete this message and any attachments. If you are not the intended recipient, please note that any use, distribution, copying or retaining this message or its attachments is strictly prohibited.

LEGAL NOTICE

The data in the context of this communication is treated in accordance with our privacy policy. You can learn more about your rights at <https://www.mm.group/en/privacy-statement/>.

From: Shafer, Samantha <SShafer@idem.IN.gov>

Sent: Thursday, June 27, 2024 8:00 AM

To: Cooper Roy E <RoyE.Cooper@mm.group>

Subject: RE: RCRA Inspection 6/24

Roy,

Thank you, received. I will look out for the information regarding Crystal Clean and the mineral spirits.

Since you are not managing your aerosols as universal waste, these can count towards your hazardous waste generation. Because of this, I have a few additional questions to determine your overall compliance.

4. Have you determined these aerosols to be hazardous or non-hazardous waste? Attached are the SDSs for 3 aerosol; they are hazardous but we exhaust them completely
5. What do you do with your aerosol cans that clog up and cannot be emptied? Aerosol do not clog are able to be discharged 100%
6. What happens to any residual solvent from the puncturing of the cans done by ISG? No residual

Thanks,



Samantha Shafer (she/they)

Environmental Manager

Hazardous Waste Compliance | Office of Land Quality

Indiana Department of Environmental Management

(317) 447-0351 sshafer@idem.in.gov

From: Cooper Roy E <RoyE.Cooper@mm.group>

Sent: Wednesday, June 26, 2024 4:53 PM

To: Shafer, Samantha <SShafer@idem.IN.gov>

Subject: Re: RCRA Inspection 6/24

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Below please find the response to the inquiry about disposition of waste.

- Autowash 9000 - **Harsco**
- Waste glue - **Harsco**
- Used oil - **ISG sends all used oil collected for recycling through one of their our vendors, for the last year, used GFL Environmental**
- Universal Waste Aerosols - **NOT MANAGED AS UNIVERSAL WASTE , ISG a visit to your facility to puncture these aerosols with the proper tools, PPE and filters, in order to make them RCRA empty containers, ISG shipped the RCRA empty punctured cans back to there facility where they were crushed and recycled of as scrap steel.**
- Fluorescent Bulbs - **universal waste and fluorescent lamps sent to Lighting Resources.**
- Platemaker Waste - **I'll reach out to about this**

I am waiting for information from Crystal Clean on disposal of the mineral spirits from the parts washer.

From: Shafer, Samantha <SShafer@idem.IN.gov>

Sent: Wednesday, June 26, 2024 8:14 AM

To: Cooper Roy E <RoyE.Cooper@mm.group>

Subject: RE: RCRA Inspection 6/24

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Roye,

Upon further review with my section chief, there is additional information I still require from you to complete your report. For the disposition of several waste streams, the location you gave me was ISG transportation. We require the final disposition location, not the transporter. I require the final disposition location for the following:

-Autowash 9000

- Waste glue
- Used oil
- Universal Waste Aerosols
- Fluorescent Bulbs
- Platemaker Waste

These locations should be listed on your non-hazardous manifests and/or bills of lading. Additionally, can you please describe to me and provide documentation for what Crystal Kleen does with your mineral spirits once they service your parts washer? IDEM would like to know if they are disposing or recycling your solvent.

Please give me a call if you have any questions!



Samantha Shafer (she/they)
Environmental Manager
Hazardous Waste Compliance | Office of Land Quality
Indiana Department of Environmental Management

(317) 447-0351 sshafer@idem.in.gov

From: Cooper Roy E <RoyE.Cooper@mm.group>
Sent: Tuesday, June 25, 2024 3:28 PM
To: Shafer, Samantha <SShafer@idem.IN.gov>
Subject: Re: RCRA Inspection 6/24

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

Attached is the SDS for the parts washer

Roy Cooper

HSE Manager

317-429-4076

317-417-1031 Mobile

6454 Saguaro Court

Indianapolis, Indiana 46268

United States

RoyE.Cooper@mm.group

<https://www.mm.group>

MM Packaging US, Inc

Registered Number: 51-0299429

Registered in Delaware, USA

Registered Office: Corporation Trust Center, 1209 Orange Street, Wilmington, New Castle, 19801, United States

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From: Shafer, Samantha <SShafer@idem.IN.gov>

Sent: Tuesday, June 25, 2024 2:29 PM

To: Cooper Roy E <RoyE.Cooper@mm.group>

Subject: RCRA Inspection 6/24

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Roy,

Thank you again for taking the time to meet with IDEM for your RCRA hazardous waste inspection on 6/24/24. In addition to the shipping and final disposition information for your platemaker waste, I

would appreciate if you could send a copy of your SDS for your solvent parts washer for our records. Please get this information to me by end of day today.

Have a good rest of your day!

Thanks,



Samantha Shafer (she/they)

Environmental Manager

Hazardous Waste Compliance | Office of Land Quality

Indiana Department of Environmental Management

(317) 447-0351 sshafer@idem.in.gov