



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 3, 2024

VIA EMAIL

Ms. Melanie Evans
Monosol LLC
155 S Mount Zion Rd
Lebanon, In 46052

Re: Inspection Summary Letter
Monosol LLC
INR000147363
Lebanon, Boone County

Dear Ms. Evans,

On 6/26/2024, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Monosol LLC, located at 155 S Mount Zion Rd, Lebanon, 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: No Violation(s) Discovered

Please direct any response to this letter and any questions to me at (317) 903-1822 or kspears@idem.in.gov.

Sincerely,

Kaleb Spears
Hazardous Waste Compliance Section
Compliance Branch

Enclosure

cc: Boone County Health Department



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

Inspector's Name:	Kaleb Spears
Others Present	N/A
Date:	Wednesday, June 26, 2024
Time In:	2:25 PM
Time Out:	4:30 PM
Inspection Type	Compliance Evaluation Inspection

General Information

Facility Information	
Facility Name	Monosol LLC
Facility Location	155 S Mount Zion Rd Lebanon, IN 46052 Boone County
Facility Mailing Information	Same Address as Facility
Facility Contact	Melanie Evans 219-324-9459 Sr. Manager-Environmental & Industrial Hygiene 219-324-9459 melanie.evans@kuraray.com
Primary Facility Contact During Inspection	Paul Brooks Environmental Coordinator 219-716-4017 paul.brooks@kuraray.com
Other Facility Contact(s) During Inspection	N/A

Facility ID			
EPA ID Number	INR000147363	NAICS Code	326113

Facility Status			
File Status	Small Quantity Generator	Other Activities	

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

Inspection Narrative

On June 26th, 2024, Kaleb Spears (Environmental Manager) from the IDEM Office of Land Quality conducted a routine compliance inspection (CEI) at Monosol LLC. Kaleb Spears (IDEM) arrived onsite at 2:25 pm and met with Paul Brooks (Environmental Coordinator). A brief introduction explained the purpose of the inspection and what facility areas and operations would be looked at by IDEM staff. The inspection itinerary consisted of an opening conference, a facility tour, document(s) review, and a closing conference.

Monosol LLC is a manufacturing facility in Lebanon, Indiana; it produces water-soluble films and solutions used for agricultural, consumer, and industrial use. The film production process produces no hazardous waste. The primary hazardous waste, methanesulfonic acid (D001, D002, and F003), is produced from the laboratory testing onsite. The most prominent waste stream produced is the non-hazardous band coating that is used as lubrication in film production onsite. At the time of inspection, Monosol LLC was registered as a small quantity generator (SQG) of hazardous waste. The facility is approximately 150,000 square feet and operates 24/7 on two separate 12-hour shifts: with a staff of 90 employees.

Areas observed during the inspection included the laboratory, air compressor room, central accumulation area (CAA), and production floor. Upon inspection of both the laboratory satellite accumulation area (SAA) and the central accumulation area (CAA), the observed regulatory activity of Monosol LLC is that of a very small quantity generator (VSQG) at the time of inspection. Two emergency information posting forms were provided to the facility

After the facility tour was finished, a document(s) review was held in the opening conference room. Documents reviewed include three years of hazardous waste manifests, annual/biennial reports, waste analysis records, and land disposal restriction forms (LDRs).

After the document(s) review, a summary of the inspection was provided to Paul Brooks (Monosol LLC). No violation(s) were discovered at the time of inspection; no further action is required.

Regulatory Status		
Observed Activity	Very Small Quantity Generator	Other Activities
Documents Reviewed	Manifests Waste Analysis Land Disposal Notification Annual/Biennial Reports Waste Analysis Record	
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
D001 - Ignitable, D002 - Corrosive, F003 - Spent non-halogenated solvents (ignitable)	Lab Chemical	Laboratory Testing	40 pounds/month	Clean Earth
Non-hazardous	Band Coating	Lubrication	275-400 gallons/month	Clean Earth
Exempted/Excluded	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Inspected <input type="radio"/> Not Applicable			
Explanation	Explanation			
	Scrap Metal 329 IAC 3.1-6-4			
Waste Management Areas				
Container Management Area(s) <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not inspected <input type="radio"/> Not applicable				
EPA Waste Codes	Location	Number	Size	Type of Container
D001 - Ignitable, D002 - Corrosive, F003 - Spent non-halogenated solvents (ignitable)	CAA	1	55 gallon	Plastic
Satellite Area(s)	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not inspected <input type="radio"/> Not applicable			
EPA Waste Codes	Location	Comments		

D001 - Ignitable, D002 - Corrosive, F003 - Spent non-halogenated solvents (ignitable)	Laboratory	1 x 450ml flask ; No violation(s)
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Tanks, Restricted Waste Sites, and Other Regulated Units
 Yes No Not inspected Not applicable

Environmental Releases

Visible Releases/Contamination/Discharges Yes 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 Yes No

P2 Suggestions

Guidance Materials

Guidance Materials Provided to Facility

Checklist
(Checked box indicates a compliance concern)

<p>Standards</p> <input 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	<p>TSDF Permit Requirements</p> <input type="checkbox"/> TSDF Permit Requirements <input type="checkbox"/> Other Violation
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<p>LQG Hazardous Waste Standards</p> <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	<p>SQG Hazardous Waste Standards</p> <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
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<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" <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	<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 <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 VSQG Standards <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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Satellite Accumulation – SQG and LQG	Manifest and Recordkeeping - LQG and SQG
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<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 <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	<input type="checkbox"/> Manifest General Requirements <input type="checkbox"/> Use of the Manifest
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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 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"/> 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)

Inspection Documentation	
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Photographs	<input type="radio"/> Yes <input checked="" type="radio"/> No
Map	<input 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	
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Comments:	
Inspection Results	
No Violation(s) Discovered	
Multi-Media Concerns	
No concerns noted	

Finalize Inspection	
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Written Summary of Inspection	Notice of Inspection and Verbal Summary Provided	
Inspector Information	Printed/Typed Name	Kaleb Spears
	Phone Number:	(317) 903-1822
	Email Address:	kspears@idem.in.gov
	Signature:	Obtained on the Inspection Verification/Findings Form
Facility Representative Signature	Printed/Typed Name:	Paul Brooks
	Signature:	Obtained on the Inspection Verification/Findings Form



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 6/26/24 an inspection of Monosol LLC 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.

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, Violations require a submittal, Violations subject to enforcement, Additional information required, and Other/Comments.

Confidential Information

In accordance with 329 IAC 6.1... A person submitting information to the department for which confidential treatment is requested shall make a written claim of confidentiality... The undersigned Owner/Representative has alleged information acquired during this inspection [] does [X] does not (check one) contain confidential information.

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.

IDEM Representative:

Handwritten information for IDEM Representative: Name (Kaleb Spears), Signature, Date (6/26/24), Phone Number (317-903-1822), Email (kspears@idem.in.gov), Time In/Out (2:25pm/4:30pm).

Owner/Representative:

Handwritten information for Owner/Representative: Name (Paul Brooks), Signature, Title (Env. Coordinator), Phone Number (219-716-4017), Email (paul.brooks@kucronay.com), Date (6/26/24).

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: []