



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

June 27, 2024

VIA E-MAIL

Matthew Morris, Vice President
Liquid Waste Removal, Incorporated
500 South Polk Street, Suite 100
Greenwood, Indiana 46143
Mmorris@liquidwasteremoval.com

Re: Return To Compliance Letter

Dear Mr. Morris:

Based upon documents available to the Office of Land Quality during a record review on June 26, 2024 it has been determined that Liquid Waste Removal, Incorporated has achieved compliance with the terms of the Inspection Results letter issued to you on May 22, 2024.

Thank you for your cooperation. If you have any questions concerning this matter, please contact me at (317) 519-6896.

Sincerely,

Troy South, Sr. Environmental Manager
Industrial Waste Section
Compliance Branch
Office of Land Quality

Enclosure

cc: Johnson County Health Department



Visit on.IN.gov/survey or scan the QR code to provide feedback.

We appreciate your input!



C.2

Description of Violations: Includes observed violations with corresponding regulatory citations and permit conditions (when applicable), corrective measures and compliance dates.

Violations Cited During the May 20, 2024 IDEM Inspection

329 IAC 11-13.5-6 Operational requirements Sec. 6. (b) The processing facility and adjacent areas must be maintained clean and litter free when not in use.

Solid Waste Processing Facility Permit Renewal, Liquid Waste Removal Processing Facility SW Program ID 41-04 October 31, 2023: B. Operational Requirements, B1. The permittee must comply with the Operational Requirements in 329 IAC 11-13.5, the facility's approved operating plan described in the narrative titled "LWR Facility Operating Plan" dated August 3, 2022 (VFC #83351908) and the following: **a.** Perform, on each operating day, housekeeping and maintenance of the processing areas. **b.** Maintain the processing area, storage areas, and adjacent areas so they are clean and litter free when not in use, and follow the routine cleanup procedure in Sections H and Q of "LWR Facility Operating Plan" in the document dated August 3, 2022 (VFC #83351908). **c.** Promptly correct any nuisance, pollution conditions, or litter in the building or on the grounds.

Note: During the inspection it was noted that waste has accumulated on the back wall of the processing area behind the open top solidification tank due to mixing and splattering. Facility staff said this wall is not being cleaned on a regular basis.

REQUIRED ACTION: Perform, on each operating day, housekeeping and maintenance of the processing areas to include all applicable surfaces. Maintain the processing areas and adjacent areas so they are clean.

Status Update: Returned to Compliance. Facility staff cleaned the back wall of the processing area and installed a plastic cover behind the solidification tank (see attached LWR response to violations and photos).

329 IAC 11-9-1 Permit requirements Sec. 1 (a) Unless excluded in 329 IAC 11-3, any person who constructs or operates a solid waste processing facility as defined under 329 IAC 11-2-43 shall have a solid waste processing facility permit under this article.

Solid Waste Processing Facility Permit Renewal, Liquid Waste Removal Processing Facility SW Program ID 41-04 October 31, 2023: B. Operational Requirements, B11. The permittee is approved to solidify waste inside the solidification tank. The solidification tank is identified on the Facility Site Map, dated March 1, 2022 (VFC #83288331), p. 4 of 18). The permittee must solidify non-hazardous waste in the solidification tank and manage solidified waste in compliance with the following: **c.** The solidified waste must pass the Method 9095A (Paint Filter Liquids Test) described in 329 IAC 10-2-106 before it is removed from the unit.

Note: IDEM staff observed that coffee filters were being used for the Paint Filter Liquids Test.

REQUIRED ACTION: The facility must perform the free liquids test on solidified waste (a 100-mL or 100-g representative sample is required for the test) in accordance with rule requirements using Method 9095A with conical paint filter: Mesh number 60 +/- 5% (fine meshed size) available at local paint stores such as Sherwin-Williams and Glidden. The paint filter is placed on a ring stand along with a glass funnel if needed for support.

Status Update: Returned to Compliance. LWR has obtained the required Mesh #60 paint filters from Sherwin-Williams and will use these for future paint filter liquids testing (see attached LWR response to violations).

June 20, 2024

Indiana Department of Environmental Management
Office of Land Quality
Industrial Waste Section
100 North Senate Avenue
Indianapolis, IN 46204
Attn: Troy South
Via Email: tsouth@idem.IN.gov

RE: Violation / Inspection Summary Letter
SW Program ID 41-04
Liquid Waste Removal, Inc.
500 South Polk Street, Suite 100
Greenwood, Indiana 46143

Dear Mr. South:

On behalf of our client, Liquid Waste Removal, Inc. (LWR), KERAMIDA is submitting this response to the Violation / Inspection Summary Letter issued on May 22, 2024.

A total of two (2) Violations were noted in the Letter, both of which have been corrected. Each item is cited below, along with a description of the corrective action.

Violation #1

329 IAC 11-13.5-6 Operational Requirements Sec. 6 (b) The processing facility and adjacent areas must be maintained clean and litter free when not in use.

Solid Waste Processing Facility Permit Renewal, Liquid Waste Removal Processing Facility SW Program ID 41-04 October 31, 2023: B. Operational Requirements, B1. The permittee must comply with the Operational Requirements in 329 IAC 11-13.5, the facility's approved operating plan described in the narrative titled "LWR Facility Operating Plan" dated August 3, 2022 (VFC #83351908) and the following: **a.** Perform, on each operating day, housekeeping and maintenance in the processing areas. **b.** Maintain the processing area, storage areas, and adjacent areas so they are clean and litter free when not in use, and follow the routine cleanup procedures in Sections H and Q of the "LWR Facility Operating Plan" in the document dated August 3, 2022 (VFC #83351908). **c.** Promptly correct any nuisance, pollution conditions, or litter in the building or on the grounds.

Note: *During the inspection it was noted that waste has accumulated on the back wall of the processing area behind the open top solidification tank due to mixing and splattering. Facility staff said this wall is not being cleaned on a regular basis.*

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REQUIRED ACTION: Perform, on each operating day, housekeeping and maintenance of the processing areas to include all applicable surfaces. Maintain the processing areas and adjacent areas so they are clean.

LWR Response: As requested, cleaning of the back wall has been conducted, as documented in the photo below:

Section Q of the LWR Facility Operating Plan stipulates that:

All employees are responsible for general housekeeping at the facility. Any litter should be picked up and placed in the appropriate trash receptacles upon discovery. Any spills, regardless of size, should be cleaned up according to the spill procedures outlined above.

Housekeeping in the solidification area must be maintained on a daily basis. Any spillage from the solidification container must be immediately returned to the container. Any absorbent material (e.g., bentonite clay, Power Pellets, or applicable waste materials) accumulated on the floor should be swept up and placed into the solidification container daily following solidification activities. Portions of the equipment used to mix the waste in the solidification container (e.g., backhoe) that contact the waste (e.g., bucket and arm) should be cleaned on a regular basis.

LWR is conducting housekeeping activities on a daily basis. As required, spillage is returned to the container immediately, and sorbent material is swept up and placed into the solidification container daily at the conclusion of solidification activities.

LWR characterizes the back wall as an *integral part of the processing area*. As such, it will be cleaned on a regular basis. This schedule is anticipated to be semiannually.

KERAMIDA is finalizing a permit modification application to address this and other concerns with the permit and the associated Operating Plan.

329 IAC 11-19-1 Permit Requirements Sec. 1 (a) Unless excluded in 329 IAC 11-3, any person who constructs or operates a solid waste processing facility as defined under 329 IAC 11-2-43 shall have a solid waste processing facility permit under this article.

Solid Waste Processing Facility Permit Renewal, Liquid Waste Removal Processing Facility SW Program ID 41-04 October 31, 2023: B. Operational Requirements, B11. The permittee is approved to solidify waste inside the solidification tank. The solidification tank is identified on the Facility Site Map dated March 1, 2022 (VFC #83288331, p. 4 of 18). The permittee must solidify non-hazardous waste in the solidification tank and manage solidified waste in compliance with the following: **c.** The solidified waste must pass the Method 9095A (Paint Filter Liquids Test) described in 329 IAC 10-2-106 before it is removed from the unit.

Note: *IDEM staff observed that coffee filters were being used for the Paint Filter Liquids.*

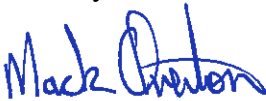
REQUIRED ACTION: The facility must perform the free liquids test on solidified waste (a 100-mL or 100-g representative sample is required for the test) in accordance with rule requirements using Method 9095A with conical paint filter: Mesh number 60 +/- 5% (fine

meshed size) available at local paint stores such as Sherwin-Williams and Glidden. The paint filter is placed on a ring stand along with a glass funnel if needed for support.

LWR Response: As requested, LWR has acquired the required Mesh #60 paint filters from Sherwin Williams and will be employing these paint filters in its laboratory testing going forward.

Thank you for the opportunity to document LWR's response actions to the noted concerns. Should you have any questions, please do not hesitate to contact either the author or the appropriate LWR personnel to discuss further.

Sincerely,

A handwritten signature in blue ink that reads "Mack Overton". The signature is written in a cursive style with a large initial "M" and a long, sweeping underline.

Mack Overton
Senior Vice President, EHS Compliance Services
KERAMIDA, Inc.





From: [Matt Morris](#)
To: [Martin, Bradley A](#)
Cc: [eswearingen](#); [SOUTH, TROY](#); [Hummel, Lindsey](#)
Subject: RE: Liquid Waste Removal Inc - Industrial Waste Inspection Report
Date: Thursday, June 27, 2024 2:26:40 PM
Attachments: [image008.png](#)
[image009.png](#)
[image010.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image001.png](#)

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

Received.

Thanks,
Matthew L. Morris, CHMM
Vice President



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Fax: (317) 889-0383
Cell: (317) 691-9391
mmorris@liquidwasteremoval.com

From: Martin, Bradley A <BAMartin@idem.IN.gov>
Sent: Thursday, June 27, 2024 6:56 AM
To: Matt Morris <mmorris@liquidwasteremoval.com>
Cc: eswearingen <eswearingen@co.johnson.in.us>; SOUTH, TROY <TSOUTH@idem.IN.gov>; Hummel, Lindsey <LHummel@idem.IN.gov>
Subject: Liquid Waste Removal Inc - Industrial Waste Inspection Report

Attached is the Industrial Waste Inspection Report for Liquid Waste Removal Inc. 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

(317) 234 6923 | Bamartin@idem.IN.gov

