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March 25, 2024

22-941

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

Re: Maxed Sandblasting and Coating Specialists, LLC
2899 Arthington Blvd., Indianapolis, IN 46218
Facility ID: 097-00662

Self-Disclosure after taking Operational Control of 2899 Arthington Blvd, Indianapolis, IN

To Whom It May Concern:

Please find enclosed the Self-Disclosure and Environmental Audit Form regarding the FESOP 097-43835-00662. Indiana Coating and Sandblasting LLC (Indiana Coating) transferred operational control to Maxed Sandblasting and Coating Specialists, LLC (Maxed). The ownership transfer was effective March 1, 2024. Maxed plans on running the facility in compliance with the FESOP 097-43835-00662. An administrative amendment application was submitted on March 4, 2024.

It was discovered that the reporting for the FESOP was not completed for 2022 and 2023, including the Quarterly Deviation and Compliance Monitoring Reports (Q3 2022, Q4 2022, Q1-Q4 2023), the Annual Compliance Certification for 2022 and 2023, and the NESHAP Annual Certification and Compliance Reports for 2022 and 2023. The proper reporting will be submitted going forward starting with the first quarter 2024.

If you have any questions, please contact Eric Brown, President of Maxed at (317) 495-5442. You can also contact Anne Tkacz of IWM Consulting Group at (260) 402-3404.

Sincerely,
IWM Consulting Group

Anne Tkacz, P.E.
Project Manager

cc: Eric Brown, President – Maxed Sandblasting and Coating Specialists, LLC
Enclosures: Self-Disclosure and Environmental Audit Forms



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](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 Maxed Sandblasting and Coating Specialists, LLC			Is the regulatory entity a new owner? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Physical Street Address (number and street) 2899 Arthington Blvd			Is the facility a small regulated entity? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
City Indianapolis	State IN	ZIP Code 46218	NAICS Code 332312	SIC Code 3441
IDEM Program ID(s) (i.e., Plant ID, NPDES, RCRA, FID, CAFO/Farm ID, PWSID, Source ID) FESOP 097-43835-00662				
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 Eric Brown			Job Title President/Owner	
Email address ebrown@maxedllc.com			Telephone number (with area code) (317) 495-5442	
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: Air Permit B.9 - Annual Compliance Certification not submitted for ry2022. B.22 - Fee Payment for 2023 was not paid. C.18 and D.1.11 Reporting Requirements - Q3 22, Q4 22, Q1-Q4 23 Quarterly Deviation and Compliance Monitoring Reports and Certification. E.1.2 (5) Annual Certification & Compliance Reports were not submitted.				
How was the violation discovered? Search of Virtual Filing Cabinet			Date the violation was discovered (month, day, year) March 1, 2024	

Physical location of the violation: 2899 Arthington Blvd, Indianapolis, IN 46218 -
Other Comments: Reporting not completed. Maxed is not aware of what operations took place from July 2022 - December 2023.
CONDITIONS REQUIRED UNDER THE SELF-DISCLOSURE AND AUDIT POLICY <i>In addition to answering Yes/No, please provide a detailed explanation of how each of the 9 Audit Policy conditions have been met.</i>
<p>1. Was the violation discovered through an environmental audit or Compliance Management System?</p> <p>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.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Explain: Maxed Sandblasting and Coating Specialists, LLC (Maxed) took over the operational control of the Indiana Coating and Sandblasting operation at the address on March 1, 2024. CTAP was consulted after it was determined reporting not done.</p>
<p>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? (<i>See Policy for a regulated entity with a new owner.</i>)</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Explain: Maxed took over the operation March 1, 2024. It was discovered that reporting had not been submitted by Indiana Coating and Sandblasting.</p>
<p>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.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Explain: CTAP was contacted on March 1, 2024. It was recommended that Maxed fill out the self-disclosure forms.</p>
<p>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.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Explain: The discovery and disclosure is independent of a government or third party plaintiff.</p>
<p>5. Was the violation corrected at the time of disclosure?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>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. (<i>See Policy if more than sixty (60) days are needed to correct the violation.</i>)</p> <p>Reporting will be submitted on time starting for Q1 2024.</p>

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

IWM Consulting Group will assist Maxed in meeting all reporting requirements.

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

Yes No

Explain: There have been no violations in the last three (3) years that Maxed is aware of at this facility. Shelby Coatings was the previous owner and IWM Consulting Group did the reporting for them from 2017-June 2022 when the facility was sold to Indiana Coating and Sandblasting LLC.

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

Yes No

Explain: Maxed has not had any violations in the last three years.

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

Yes No

Explain: The violation did not result in serious environmental harm or risk to human health as far as Maxed knows.

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

Yes No

Explain: The violation did not result in an imminent and substantial endangerment to human health as far as Maxed knows.

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

Yes No

Explain: Maxed took operational control March 1, 2024. Reporting will be done as required going forward. IWM Consulting Group will assist with the reporting.

d. Was the violation inadvertent?

Yes No

Explain: Maxed took operational control March 1, 2024. Reporting will be done as required going forward. Maxed assumes the lack of reporting was inadvertent, but cannot know the answer for sure.

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

Yes No

Explain: The violation did not violate specific terms of any judicial or administrative order; however, the reporting requirements of the air permit, FESOP 097-43835-00662, were not completed as required.

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

Yes No

Explain: Maxed took control on March 1, 2024 and is willing to answer questions.

Estimate of the cost of compliance: Maxed will do the necessary reporting going forward.

Basis of estimate: \$8,000-10,000/yr

IWM Consulting Group cost 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.

Eric Brown

Name (printed)

President.Owner

Title

Signature



3-21-24

Date (month, day, year)