



# 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](http://www.idem.IN.gov)

**Eric J. Holcomb**  
Governor

**Brian C. Rockensuess**  
Commissioner

June 27, 2024

## VIA EMAIL

Mr. Raymond Burns  
Director of Research & Development  
Lucas Oil Products  
3199 Harrison Way NW  
Corydon, IN 47112

Re: Violation Letter  
Lucas Oil Products  
INR000144725  
Corydon, Harrison County

Dear Dr. Burns:

On 6/24/2024, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Lucas Oil Products, located at 3199 Harrison Way NW, Corydon, 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 but corrected during the inspection.

Noncompliance with any of the violations noted in the inspection report at the time of the next inspection may result in a referral to the OLQ Enforcement Section. Please direct any questions to Katharine Frisbie at (317) 503-1213 or [kfrisbie@idem.in.gov](mailto:kfrisbie@idem.in.gov). Thank you for your attention to this matter.

Sincerely,

  
for

Susan Lowry  
Section Chief  
Hazardous Waste Compliance Section

Compliance Branch

Enclosure

cc: Harrison County Health Department



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

|                   |                                  |
|-------------------|----------------------------------|
| Inspector's Name: | Katharine Frisbie                |
| Others Present    |                                  |
| Date:             | Monday, June 24, 2024            |
| Time In:          | 11:15 AM                         |
| Time Out:         | 1:00 PM                          |
| Inspection Type   | Compliance Evaluation Inspection |

**General Information**

**Facility Information**

|   |  |
|---|--|
| <b>Facility Name</b>                              | Lucas Oil Products   |
| <b>Facility Location</b>                          | 3199 Harrison Way NW<br>Corydon, IN 47112<br>Harrison County                                 |
| <b>Facility Mailing Information</b>               | Same Address as Facility   |
| <b>Facility Contact</b>                           | Same as Primary Facility Contact   |
| <b>Primary Facility Contact During Inspection</b> | Raymond Burns<br>Director of Research & Development<br>(812) 705-6127<br>rburns@lucasoil.com |

|  |                   |                   |                  |                    |                     |                           |
|--|-------------------|-------------------|------------------|--------------------|---------------------|---------------------------|
| <b>Other Facility Contact(s) During Inspection</b> | <b>Salutation</b> | <b>First Name</b> | <b>Last Name</b> | <b>Title</b>       | <b>Phone Number</b> | <b>Email</b>              |
|  | Mr.               | Matt              | Conrad           | General Manager    | (951) 870-8742      | mconrad@lucasoil.com      |
|  | Ms.               | Debbie            | Wessel           | Safety Coordinator | (812) 972-8321      |                           |
|  | Mr.               | Rich              | Unferdorfer      | Safety Director    | (760) 953-7309      | runferdorfer@lucasoil.com |

**Facility ID**

|                      |              |                   |                |
|----------------------|--------------|-------------------|----------------|
| <b>EPA ID Number</b> | INR000144725 | <b>NAICS Code</b> | 324191; 541715 |
|----------------------|--------------|-------------------|----------------|

**Facility Status**

|                    |                          |                         |  |
|--------------------|--------------------------|-------------------------|--|
| <b>File Status</b> | Small Quantity Generator | <b>Other Activities</b> |  |
|--------------------|--------------------------|-------------------------|--|

**Outstanding Issues**

|                             |   |
|-----------------------------|---|
| <b>Last Inspection Date</b> | N/A   |
| <b>Previous Violations</b>  | <input type="radio"/> Yes <input checked="" type="radio"/> No |
| <b>Details</b>              |   |

**Inspection Narrative**

A routine compliance inspection of Lucas Oil Products (Lucas Oil) was conducted on June 18, 2024. This inspection consisted of an opening conference, facility tour, document review, and closing conference. IDEM staff was joined by Dr. Raymond Burns and Mr. Matt Conrad throughout the inspection.

Lucas Oil manufactures lubricants, fuel additives, external detailing products, etc. for the automotive industry. This facility

opened in 2003, and the building is one hundred fifty thousand (150,000) square feet. Two hundred (200) employees operate the facility in two shifts from 5:00 am to 3:00 am Monday through Friday with shorter hours on Saturday and Sunday. Hazardous waste is not generated through regular manufacturing activities, but it is generated by rinsing glassware in the Quality/R&D Lab. The waste generated is flammable liquids including acetone and toluene. There is a Truck Shop on site where Lucas Oil cabs are serviced. Used oil is generated in this area and stored in a tank. Lucas Oil used to use mercury thermometers at their facility and had to send a couple broken ones off in the past, but this Lucas Oil site no longer uses mercury thermometers.

Dr. Burns led IDEM on a tour of the facility which included Plant 1 and the Truck Shop (see map). Containers observed on the tour can be found in the Container Management Areas table and associated violations can be found in the Description of Violations (DOV). Manifests and container inspection logs were reviewed during the inspection and employee training was confirmed verbally. After the inspection on June 24, 2024, Dr. Burns emailed proof of arrangements with local authorities, a facility map, an LDR, a photo of posted emergency information, and a photo of the corrected label on the used oil tank (see attached email and photos).

Violations were discovered during the inspection but were corrected on site and shortly after. See Description of Violations (DOV) for more details. Please direct all responses to Katharine Frisbie at kfrisbie@idem.in.gov or (317) 503-1213.

| Regulatory Status         |   |                         |                    |
|---------------------------|---|-------------------------|--------------------|
| <b>Observed Activity</b>  | Small Quantity Generator                      | <b>Other Activities</b> | Used Oil Generator |
| <b>Documents Reviewed</b> | Manifests<br>Weekly Container Inspection Logs |                         |                    |
| <b>Comments</b>           |   |                         |                    |

| Waste Management   |  |                          |   |  |
|--|--|--------------------------|---|--|
| Comments:  |  |                          |   |  |
| Waste Stream(s) Information  |  |                          |   |  |
| <b>Waste Streams</b>   |  |                          |   |  |
| <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, F003, F005   | Waste flammable liquids  | Glassware rinse from Lab | About fifty-five (55) gallons every seventy-five (75) days        | Reclaimed Energy Inc., A Division of Superior Industrial Solutions, Inc. |
| D009   | Mercury containing equipment   | Broken thermometer       | Incidental - mercury thermometers no longer used at this site     | No longer generated; previously - Heritage Environmental Services LLC    |
| Used Oil   | Used oil   | Fleet maintenance        | Three hundred fifty (350) to five hundred (500) gallons per month | GFL Environmental Inc.   |
| <b>Exempted/Excluded</b>   | <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Inspected <input type="radio"/> Not Applicable |                          |   |  |
| <b>Explanation</b>   | <b>Explanation</b>   |                          |   |  |
|  | Scrap Metal - 329 IAC 3.1-6-4  |                          |   |  |
| Waste Management Areas   |  |                          |   |  |
| <b>Container Management Area(s)</b>  | <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, F003, F005 | Outside Raw Material Storage | Two    | 55 gallon | Steel             |

Satellite Area(s)  Yes  No  Not inspected  Not applicable

| EPA Waste Codes  | Location | Comments |
|------------------|----------|----------|
| D001, F003, F005 | Lab      | See DOV  |

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

| EPA Waste Codes | Type/Construction | Location   | Quantity On-Site | Size        | Unit |
|-----------------|-------------------|------------|------------------|-------------|------|
| Used Oil        | Steel             | Truck Shop | 300 gallons      | 500 gallons | Tank |

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

| Compliance Assistance  |   |
|--|---|
| <b>P2 Information</b>  |   |
| 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 <a href="http://www.in.gov/idem/5298.htm">http://www.in.gov/idem/5298.htm</a> for additional information. |   |
| Contact by IDEM OPPTA Requested  | <input type="radio"/> Yes <input checked="" type="radio"/> No |
| <b>P2 Suggestions</b>  |   |

| Guidance Materials                      |  |
|---|--|
| Guidance Materials Provided to Facility |  |

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

|   |  |
|---|--|
| <b>LQG Hazardous Waste Standards</b><br><input type="checkbox"/> Accumulate for 90 Days or Less | <b>SQG Hazardous Waste Standards</b><br><input type="checkbox"/> Accumulate for 180 Days or Less |
|---|--|

|   |  |
|---|--|
| <ul style="list-style-type: none"> <li><input type="checkbox"/> Container Condition</li> <li><input type="checkbox"/> Compatibility of Waste with Container</li> <li><input type="checkbox"/> Containers Closed</li> <li><input type="checkbox"/> Container Handling</li> <li><input type="checkbox"/> Central Accumulation Area Inspection</li> <li><input type="checkbox"/> Ignitable or Reactive Wastes - Distance from Property Line</li> <li><input type="checkbox"/> Ignitable or Reactive Wastes - Sources of Ignition/Reaction: "No Smoking" signs</li> <li><input type="checkbox"/> Conditions for Accumulation of Incompatible Wastes</li> <li><input type="checkbox"/> Container Labeled "Hazardous Waste"</li> <li><input type="checkbox"/> Container Marked with Indication of Hazards</li> <li><input type="checkbox"/> Containers Marked with Accumulation Start Date</li> <li><input type="checkbox"/> Tank Integrity Assessment</li> <li><input type="checkbox"/> Tank Containment and Detection of Releases</li> <li><input type="checkbox"/> Tank General Operating Requirements</li> <li><input type="checkbox"/> Tank Inspections</li> <li><input type="checkbox"/> Tank Subpart BB - Monthly Pump and Valve Monitoring</li> <li><input type="checkbox"/> Tank Subpart CC - Annual Inspection/Monitoring</li> <li><input type="checkbox"/> Tank Labeled "Hazardous Waste"</li> <li><input type="checkbox"/> Tank Marked with Indication of Hazards</li> <li><input type="checkbox"/> Tank Documentation for 90-Day Accumulation</li> <li><input type="checkbox"/> Maintenance and Operation of Facility</li> <li><input type="checkbox"/> Required Equipment</li> <li><input type="checkbox"/> Testing and Maintenance of Equipment</li> <li><input type="checkbox"/> Aisle Space</li> <li><input type="checkbox"/> Arrangements with Local Authorities</li> <li><input type="checkbox"/> Arrangements with Local Authorities - Documentation</li> <li><input type="checkbox"/> Contingency Plan Developed</li> <li><input type="checkbox"/> Content of Contingency Plan</li> <li><input type="checkbox"/> Copies of Contingency Plan</li> <li><input type="checkbox"/> Contingency Plan Quick Reference Guide</li> <li><input type="checkbox"/> Emergency Coordinator</li> <li><input type="checkbox"/> Personnel Training Program</li> <li><input type="checkbox"/> Personnel Training - Complete Within Six Months</li> <li><input type="checkbox"/> Personnel Training Annual Review</li> <li><input type="checkbox"/> Personnel Training Documentation</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Accumulation Limit</li> <li><input type="checkbox"/> Container Condition</li> <li><input type="checkbox"/> Compatibility of Waste with Container</li> <li><input type="checkbox"/> Containers Closed</li> <li><input type="checkbox"/> Container Handling</li> <li><input type="checkbox"/> Central Accumulation Area Inspections</li> <li><input type="checkbox"/> Conditions for Accumulation of Incompatible Wastes</li> <li><input type="checkbox"/> Container Labeled "Hazardous Waste"</li> <li><input checked="" type="checkbox"/> Container Marked with Indication of Hazards</li> <li><input type="checkbox"/> Container Marked with Accumulation Start Date</li> <li><input type="checkbox"/> Tank Operating Conditions</li> <li><input type="checkbox"/> Tank Inspections</li> <li><input type="checkbox"/> Tank Labeled "Hazardous Waste"</li> <li><input type="checkbox"/> Tank Marked with Indication of Hazardous</li> <li><input type="checkbox"/> Tank Documentation for 180-Day Accumulation</li> <li><input type="checkbox"/> Land Disposal Restrictions</li> <li><input type="checkbox"/> Maintenance and Operation of Facility</li> <li><input type="checkbox"/> Required Equipment</li> <li><input type="checkbox"/> Testing and Maintenance of Equipment</li> <li><input type="checkbox"/> Access to Communications or Alarm System</li> <li><input type="checkbox"/> Aisle Space</li> <li><input type="checkbox"/> Arrangements with Local Authorities</li> <li><input type="checkbox"/> Arrangements with Local Authorities - Documentation</li> <li><input type="checkbox"/> Emergency Coordinator</li> <li><input checked="" type="checkbox"/> Emergency Information Posted</li> <li><input type="checkbox"/> Employee Training</li> <li><input type="checkbox"/> Other Small Quantity Generator Standards</li> </ul> <hr/> <p><b>VSQG Standards</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Hazardous Waste Generation Limit</li> <li><input type="checkbox"/> Hazardous Waste Accumulation Limit</li> <li><input type="checkbox"/> Hazardous Waste Determination</li> <li><input type="checkbox"/> Proper Disposal</li> <li><input type="checkbox"/> Prohibited Disposal of Liquids in Landfills</li> </ul> |
|---|--|

|  |  |
|--|--|
| <input type="checkbox"/> Personnel Training Record Retention<br><input type="checkbox"/> Notification for Closure<br><input type="checkbox"/> Land Disposal Restrictions<br><input type="checkbox"/> Large Quantity Generator - Other Violations |  |
|--|--|

|   |   |
|---|---|
| <b>Satellite Accumulation – SQG and LQG</b><br><input type="checkbox"/> Quantity Limits, Point of Generation, Under Control of Operator<br><input type="checkbox"/> Container Condition<br><input type="checkbox"/> Compatibility with Container<br><input type="checkbox"/> Incompatible Wastes<br><input type="checkbox"/> Containers Closed<br><input type="checkbox"/> Container Labeled "Hazardous Waste"<br><input checked="" type="checkbox"/> Container Marked with Indication of Hazards<br><input type="checkbox"/> Preparedness and Prevention<br><input type="checkbox"/> Excess Generation | <b>Manifest and Recordkeeping - LQG and SQG</b><br><input type="checkbox"/> Manifest General Requirements<br><input type="checkbox"/> Use of the Manifest |
|---|---|

|   |  |
|---|--|
| <b>Episodic Generation</b><br><input type="checkbox"/> Notification<br><input type="checkbox"/> EPA ID Number<br><input type="checkbox"/> Accumulate for 60 Days or Less<br><input type="checkbox"/> Accumulation Prohibitions<br><input type="checkbox"/> Container Labeling<br><input type="checkbox"/> Tank Labeling and Recordkeeping<br><input type="checkbox"/> Recordkeeping<br><input type="checkbox"/> Preparedness and Prevention<br><input type="checkbox"/> Other Violation | <b>Hazardous Secondary Materials</b><br><input type="checkbox"/> Reclaimed Under Control of the Generator<br><input type="checkbox"/> Contained<br><input type="checkbox"/> Speculative Accumulation<br><input type="checkbox"/> Notice<br><input type="checkbox"/> Documentation of Legitimacy Determination<br><input type="checkbox"/> Emergency Preparedness and Response<br><input type="checkbox"/> Emergency Procedures (Accumulates 6,000 kg or Less)<br><input type="checkbox"/> Emergency Procedures (Accumulates Greater than 6,000 kg)<br><input type="checkbox"/> Other Violation |
|---|--|

|   |   |
|---|---|
| <b>Solvent-Contaminated Wipes – Disposal</b><br><input type="checkbox"/> Container Management (Non-leaking containers)<br><input type="checkbox"/> Closed Containers<br><input type="checkbox"/> Labeling<br><input type="checkbox"/> Accumulation Time<br><input type="checkbox"/> No Free Liquids<br><input type="checkbox"/> Free Liquids Management<br><input type="checkbox"/> Documentation<br><input type="checkbox"/> Final Disposition | <b>Solvent-Contaminated Wipes - Laundered or Dry Cleaned</b><br><input type="checkbox"/> Container Management (Non-leaking containers)<br><input type="checkbox"/> Closed Containers<br><input type="checkbox"/> Labeling<br><input type="checkbox"/> Accumulation Time<br><input type="checkbox"/> No Free Liquids<br><input type="checkbox"/> Free Liquids Management<br><input type="checkbox"/> Documentation<br><input type="checkbox"/> Clean Water Act |
|---|---|

|   |                                  |
|---|----------------------------------|
| <b>Universal Waste – All Facilities</b> | <b>Used Oil – All Facilities</b> |
|---|----------------------------------|

|  |   |
|--|---|
| <input type="checkbox"/> Universal Waste Labeling                                  | <input type="checkbox"/> Rebuttable Presumption Applies                           |
| <input type="checkbox"/> Containers - Closed, Good Condition, No Evidence of Leaks | <input type="checkbox"/> Containers and Tanks in Good Condition                   |
| <input type="checkbox"/> Universal Waste - Bulb Crushing Prohibition               | <input checked="" 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 |

**Description of Violation(s)**

**SATELLITE ACCUMULATION - SQG AND LQG**

**CONTAINER MARKED WITH INDICATION OF HAZARDS**

**CITATION:**  
 40 CFR 262.15(a)(5)(ii): A generator must mark or label its (satellite) containers with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

**DETAILS:**  
 One (1) 55-gallon steel drum containing waste flammable liquids as well as acetone and toluene was observed in the Lab missing an indication of toxicity (see photo 3). This violation was corrected on site and does not require additional follow up,

**REQUIRED ACTION:**  
 In the future, mark or label all satellite hazardous waste containers with the indication of the hazards of the contents.

**SQG HAZARDOUS WASTE STANDARDS**

**CONTAINER MARKED WITH INDICATION OF HAZARDS**

**CITATION:**  
 40 CFR 262.16(b)(6)(i)(B): A small quantity generator must mark or label its containers with an indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704).

**DETAILS:**  
 Two (2) 55-gallon steel drums containing flammable liquids including acetone and toluene were observed missing an indication of toxicity (see photo 3). Both containers were corrected on site and do not require additional follow up (see photo 4).

**REQUIRED ACTION:**  
 In the future, ensure that all hazardous waste containers or tanks are marked or labeled with an indication of the hazards of the contents.

**EMERGENCY INFORMATION POSTED**

**CITATION:**  
 40 CFR 262.16(b)(9)(ii): The small quantity generator must post the following information next to telephones or in areas directly involved in the generation and accumulation of hazardous waste: (A) The name and phone number of the emergency coordinator; (B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and (C) The telephone number of the fire department, unless the facility has a direct alarm.

**DETAILS:**  
 Lucas Oil did not have emergency information posted at the time of inspection. IDEM staff provided Mr. Burns with a template and the violation was corrected following the inspection (see attached email and photo).



## USED OIL - ALL FACILITIES

### CONTAINERS/TANK LABELING

**CITATION:**

329 IAC 13-4-3(d) (Container/Tank Labeling): Generators must label all used oil containers and above ground tanks with the words "Used Oil".

**DETAILS:**

One (1) 500-gallon tank containing used oil was observed in the Truck Shop missing a "Used Oil" label. IDEM staff provided Mr. Conrad with a label and the violation was corrected after the inspection (see attached email and photo).

**REQUIRED ACTION:**

In the future, ensure that all containers and tanks used to accumulate, and store used oil are marked or labeled with the words "Used Oil".

### Inspection Documentation

|                                       |  |  |
|---------------------------------------|--|--|
| <b>Photographs</b>                    | <input checked="" type="radio"/> Yes<br><input type="radio"/> No |  |
| <b>Map</b>                            | <input checked="" type="radio"/> Maps                            |  |
| <b>GPS Location Collected</b>         | <input type="radio"/> Yes<br><input checked="" type="radio"/> No |  |
| <b>Analytical Screening Conducted</b> | <input type="radio"/> Yes<br><input checked="" type="radio"/> No |  |
| <b>Lab Sample</b>                     | <input type="radio"/> Yes<br><input checked="" type="radio"/> No |  |


### Inspection Results/Actions


|   |  |
|---|--|
| <b>Comments:</b>  |  |
| <b>Inspection Results</b>                                       |  |
| Violations were discovered but corrected during the inspection. |  |
| <b>Multi-Media Concerns</b>                                     |  |
| No concerns noted   |  |

### Finalize Inspection

|  |  |   |
|--|--|---|
| <b>Written Summary of Inspection</b>     | Notice of Inspection and Verbal Summary Provided |   |
| <b>Inspector Information</b>             | Printed/Typed Name                               | Katharine Frisbie                                     |
|  | Phone Number:                                    | (317) 503-1213  |
|  | Email Address:                                   | kfrisbie@idem.in.gov                                  |
|  | Signature:                                       | Obtained on the Inspection Verification/Findings Form |
| <b>Facility Representative Signature</b> | Printed/Typed Name:                              | Raymond Burns   |
|  | Signature:                                       | Obtained on the Inspection Verification/Findings Form |

### Photo Table: Lucas Oil Products

|   |                      |   |
|---|----------------------|---|
|  | <b>Number</b>        | 1   |
|   | <b>Description</b>   | One (1) 55-gallon steel drum containing waste flammable liquids including acetone and toluene located outside of Raw Material Storage. A violation was cited for missing an indication of toxicity. |
|   | <b>Photographer</b>  | Katharine Frisbie   |
|   | <b>Facility Name</b> | Lucas Oil Products  |
|   | <b>Photo Date</b>    | 06/24/2024  |
|   | <b>Others</b>        | Raymond Burns- Lucas Oil Products<br>Matt Conrad- Lucas Oil Products  |

|   |                      |  |
|---|----------------------|--|
|  | <b>Number</b>        | 2  |
|   | <b>Description</b>   | One (1) 55-gallon steel drum containing waste flammable liquids including acetone and toluene located outside of Raw Material Storage with corrected indication of toxicity. |
|   | <b>Photographer</b>  | Katharine Frisbie  |
|   | <b>Facility Name</b> | Lucas Oil Products   |
|   | <b>Photo Date</b>    | 06/24/2024   |
|   | <b>Others</b>        | Raymond Burns- Lucas Oil Products<br>Matt Conrad- Lucas Oil Products   |



|                      |  |
|----------------------|--|
| <b>Number</b>        | 3  |
| <b>Description</b>   | One (1) 55-gallon steel drum containing waste flammable liquids including acetone and toluene located by the Lab. A violation was cited for missing an indication of toxicity. |
| <b>Photographer</b>  | Katharine Frisbie  |
| <b>Facility Name</b> | Lucas Oil Products   |
| <b>Photo Date</b>    | 06/24/2024   |
| <b>Others</b>        | Raymond Burns- Lucas Oil Products<br>Matt Conrad- Lucas Oil Products   |



|                      |   |
|----------------------|---|
| <b>Number</b>        | 4   |
| <b>Description</b>   | One (1) 55-gallon steel drum containing waste flammable liquids including acetone and toluene located by the lab with corrected indication of toxicity. |
| <b>Photographer</b>  | Katharine Frisbie   |
| <b>Facility Name</b> | Lucas Oil Products  |
| <b>Photo Date</b>    | 06/24/2024  |
| <b>Others</b>        | Raymond Burns- Lucas Oil Products<br>Matt Conrad- Lucas Oil Products  |

## Frisbie, Katharine

---

**From:** Ray Burns <RBurns@lucasoil.com>  
**Sent:** Tuesday, June 25, 2024 12:18 PM  
**To:** Frisbie, Katharine  
**Cc:** Matt Conrad; Rich Unferdorfer  
**Subject:** RE: IDEM Inspection - Lucas Oil Follow Up Actions  
**Attachments:** LDR Notifications.pdf

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

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Hi Katie,

Please see our LDR notifications attached. These were in my digital files which we didn't look through.

**LUCAS OIL**

**Ray Burns** | Director of Research and Development  
3199 Harrison Way NW | Corydon, IN 47112  
O: 812-705-6127 | M: 951-847-8275 | RBurns@lucasoil.com

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**From:** Frisbie, Katharine <KFRisbie@idem.IN.gov>  
**Sent:** Tuesday, June 25, 2024 10:24 AM  
**To:** Ray Burns <RBurns@lucasoil.com>  
**Cc:** Matt Conrad <mconrad@lucasoil.com>; Rich Unferdorfer <runferdorfer@lucasoil.com>  
**Subject:** RE: IDEM Inspection - Lucas Oil Follow Up Actions

**Caution:** This is an external email and may have harmful content.

You don't often get email from [kfrisbie@idem.in.gov](mailto:kfrisbie@idem.in.gov). [Learn why this is important](#)

Hi Ray,

Thank you for sending those corrections to me. After looking through the regulations, the certificates of disposal that I saw yesterday are not sufficient for the LDR recordkeeping requirements. I will cite this in the report and you will have 30 days to get the LDR from the designated facility on your manifests and send it to me. Please let me know if you have any questions in the meantime!

Thank you,

**Katie Frisbie**  
Environmental Manager  
Hazardous Waste Compliance | Office of  
Land Quality



Indiana Department of Environmental  
Management

(317) 503-1213 | [kfrisbie@idem.IN.gov](mailto:kfrisbie@idem.IN.gov)

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**From:** Ray Burns <[RBurns@lucasoil.com](mailto:RBurns@lucasoil.com)>  
**Sent:** Monday, June 24, 2024 4:40 PM  
**To:** Frisbie, Katharine <[KFrisbie@idem.IN.gov](mailto:KFrisbie@idem.IN.gov)>  
**Cc:** Matt Conrad <[mconrad@lucasoil.com](mailto:mconrad@lucasoil.com)>; Rich Unferdorfer <[runferdorfer@lucasoil.com](mailto:runferdorfer@lucasoil.com)>  
**Subject:** IDEM Inspection - Lucas Oil Follow Up Actions

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

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Ms. Frisbie,

Thank you for your time and visit to our facility in Corydon, IN this morning.

As you requested, we have completed the action items related to the following findings:

- 1) Labeling our used oil tank in the truck shop.
- 2) Posting emergency response and emergency contact phone numbers.
- 3) Documentation of our working with local response authorities for pre-planning emergency responses at the site.
- 4) A site map.

If you have any other questions, please let us know. If further response is needed after issuing your report, would you please also confirm that for me.

***LUCAS OIL***

**Ray Burns** | Director of Research and Development  
3199 Harrison Way NW | Corydon, IN 47112  
O: 812-705-6127 | M: 951-847-8275 | [RBurns@lucasoil.com](mailto:RBurns@lucasoil.com)

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**USED  
OIL**





Trailer Shop

Truck Wash

Outside Tank Farm

Lucas Oil Railroad



Plant 1

Parking

Parking

Truck Shop

Approx.  
Property Line



IN

Department of Labor  
**Teen Work Hour Restriction**

Employers of minors who are 14, 15, 16 or 17 years of age are required to limit the maximum number of hours minors may be permitted to work each week. Information must be posted in a conspicuous place or in places where the minor employee is posted. For additional copies please visit [www.in.gov/dol/youth](http://www.in.gov/dol/youth)

**14 and 15 year old minors**

- 3 hours per school day
- 8 hours per non-school day
- 18 hours per school week
- 40 hours per non-school week

May not work before 7:00 a.m. or after 7:00 p.m., 9:00 p.m. from June 1 through Labor Day, except as provided in 29 CFR 570.10

May only work outside of school hours (Not during normal school hours)

**16 and 17 year old minors**

- 9 hours per day
- 40 hours per school week
- 48 hours per non-school week

No more than 6 consecutive work days and no start time between 12:00 a.m. and 5:00 a.m.

Until 10:00 p.m. on nights followed by a school day

No restricted end time on nights not followed by a school day

May not work in an establishment open to the public unless another employee at least 18 years of age is working during the same hours as the minor

**Indiana Department of Labor/Bureau of Labor Standards**  
402 West Washington Street, Room W195, Indianapolis, IN 46204  
Phone: (317) 232-2655 • Fax: (317) 233-3790 • TDD: (317) 232-2655  
E-Mail: [youthemployment@dol.in.gov](mailto:youthemployment@dol.in.gov) • Web: [www.in.gov/dol](http://www.in.gov/dol)

IN

**WORKER'S COMPENSATION**

Your employer is required to provide for payment of compensation under the Worker's Compensation Act of the State of Indiana.

Any employee who is injured while at work should report the injury immediately to their supervisor, employer, or designee.

The worker's compensation insurance carrier or the employer is:

Lucas Oil  
(name of company)

Chubb  
(name of insurance carrier or agent)

Chubb  
(name of carrier/administrator)

P.O. Box 420  
(mailing address)

Phoenix AZ  
(city, state, zip)

800-873-0101  
(telephone number)

Chubb  
(contact person)

For more information about rights or procedures under the Indiana Worker's Compensation system, call or write:

**WORKER'S COMPENSATION BOARD**  
ONE BUDSMAN DRIVE  
402 W. WASHINGTON ST.  
INDIANAPOLIS, IN 46204  
(317) 232-3888  
1-800-824-2626

Indiana Worker's Compensation Board

**Emergency Information**

For purposes of complying with 40 CFR 262.16(b)(9)(ii) generators who generate between 100 kilograms and 1,000 kilograms of hazardous waste per month must post the following information next to telephones or in areas directly involved in the generation and accumulation of hazardous waste:

**EMERGENCY COORDINATOR**

Name: Debbie Wessel

Telephone Number: 812-972-8321

Harrison County Fire

Department:

Telephone Number: 812-738-3221

**FIRE DEPARTMENT**

**EMERGENCY Equipment**

Fire extinguishers have been placed at the following locations:  
Throughout the Facility.

**Location**

- Spill Kits Throughout Facility
- Spill Kits Throughout Facility
- Spill Kits Throughout Facility
- Throughout the Facility
- Spill Kits Throughout Facility

Fire Alarms have been placed at the following locations:  
Throughout the Facility, with pull stations at all man doors.

**REPORT ENVIRONMENTAL EMERGENCIES**



1-888-233-7745  
1-800-424-8802  
IDEM  
National Response Center

**Law**

**2009**

employees are employed.  
provisions of the federal  
enacted by the Indiana  
5 per hour, effective

minimum wage for all  
employees when employees  
the overtime pay re-

each employee a state-  
the deductions made.

owns a tip credit. If the  
employer must make up the

10 consecutive calendar

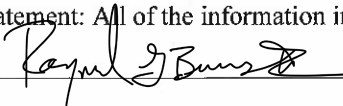
Minimum Wage Law.

our Division by email at



# GENERATOR NOTIFICATION TO RECLAIMED ENERGY OF LAND DISPOSAL RESTRICTIONS

## Part I Generator Information

Generator: Lucas Oil EPA ID#: INR000144725  
 Wastestream #: AR#18200 Wastewater: \_\_\_\_\_ Non-wastewater   
 Manifest Number: \_\_\_\_\_ Manifest Line #: 9b.1  9b.2 \_\_\_\_\_ 9b.3 \_\_\_\_\_ 9b.4 \_\_\_\_\_  
 Signature Statement: All of the information in this document is complete and accurate to the best of my knowledge and information  
 Signature:  Title: Director of R&D Date: 08/09/2023

## Part II Treatment Standards for Characteristic Waste

D001 High TOC subcategory that are managed in Non-CWA/ Non-CWA equivalent/Nonclass I SDWA systems  
 D001 High TOC Ignitable characteristic liquids subcategory – greater than or equal to 10% TOC

| Waste Code | Metal    | Concentration | Waste Code | Metal    | Concentration |
|------------|----------|---------------|------------|----------|---------------|
| D004       | Arsenic  | 5.0 mg/l      | D008       | Lead     | 5.0 mg/L      |
| D005       | Barium   | 100.0 mg/L    | D009       | Mercury  | .20 mg/L      |
| D006       | Cadmium  | 1.0 mg/L      | D010       | Selenium | 5.7 mg/L      |
| D007       | Chromium | 5.0 mg/L      | D011       | Silver   | 5.0 mg/L      |

This waste must be treated so that it meets universal treatment standards for 1) constituent that caused the waste to be identified a hazardous and 2) all other underlying hazardous constituents listed in 40 CFR 268.48.

List individual waste codes: \_\_\_\_\_

This waste is hazardous only because it exhibits the following TC organic waste codes(S): \_\_\_\_\_ and must be treated to the treatment standards under 268.40 and the individual treatment standards at 268.48 for the subset of underlying hazardous constituents listed below:

List individual uhc: \_\_\_\_\_

**NOTE:** This notification is required by 40 CFR 268.7. It is to be attached to the manifest for the initial shipment of each hazardous waste stream to Reclaimed Energy. A copy is to be retained by the generator for three years.

### Part III Treatment Standards for Listed Wastes (check codes that apply)

\_\_\_\_\_ F001      \_\_\_\_\_ F002        x   F003      \_\_\_\_\_ F004        x   F005

| Check if Applicable | Regulated Hazardous Constituent       | CAS Number | Wastewaters Conc. (mg/L) | Non Wastewaters Conc. (mg/L) |
|---------------------|---------------------------------------|------------|--------------------------|------------------------------|
| x                   | Acetone                               | 67-64-1    | 0.28                     | 160.0                        |
|                     | Benzene                               | 71-43-2    | 0.14                     | 10.0                         |
|                     | n-Butyl Alcohol                       | 71-36-3    | 5.6                      | 2.6                          |
|                     | Carbon Disulfide                      | 75-15-0    | 3.8                      | 4.8 mg/L TCLP                |
|                     | Carbon Tetrachloride                  | 56-23-5    | 0.057                    | 6.0                          |
|                     | Chlorobenzene                         | 108-90-7   | 0.057                    | 6.0                          |
|                     | m-Cresol                              | 108-39-4   | 0.77                     | 5.6                          |
|                     | o-Cresol                              | 95-46-7    | 0.11                     | 5.6                          |
|                     | Cyclohexanone                         | 108-94-1   | 0.36                     | 0.75 mg/L TCLP               |
|                     | p-Cresol                              | 106-44-5   | 0.77                     | 5.6                          |
|                     | o-Dichlorobenzene                     | 95-50-1    | 0.088                    | 6.6                          |
|                     | Ethyl acetate                         | 141-78-6   | 0.34                     | 33                           |
|                     | Ethyl benzene                         | 100-41-4   | 0.057                    | 10                           |
|                     | Ethyl Ether                           | 60-29-7    | 0.12                     | 160                          |
|                     | Isobutyl Alcohol                      | 78-83-1    | 5.6                      | 170                          |
|                     | Methanol                              | 67-56-1    | 5.6                      | 0.75mg/L TCLP                |
|                     | Methylene Chloride                    | 75-09-2    | 0.089                    | 30                           |
|                     | Methyl Ethyl Ketone                   | 78-93-3    | 0.28                     | 36                           |
|                     | Methyl Isobutyl Ketone                | 108-10-1   | 0.14                     | 33                           |
|                     | Nitrobenzene                          | 98-95-3    | 0.068                    | 14                           |
|                     | Pyridine                              | 110-86-1   | 0.014                    | 16                           |
|                     | Tetrachloroethylene                   | 127-18-4   | 0.056                    | 6.0                          |
| x                   | Toluene                               | 108-88-3   | 0.08                     | 10                           |
|                     | 1,1,1 Trichloroethane                 | 71-55-6    | 0.054                    | 6.0                          |
|                     | 1,1,2 Trichloroethane                 | 79-00-5    | 0.054                    | 6.0                          |
|                     | Trichloroethylene                     | 79-01-6    | 0.054                    | 6.0                          |
|                     | 1,1,2-trichloro 1,2,2-triflouroethane | 76-13-1    | 0.057                    | 30                           |
|                     | Trichloromonoflouromethane            | 75-69-4    | 0.02                     | 30                           |
| x                   | Xylenes (total)                       | 1330-20-7  | 0.32                     | 30                           |

**Other Listed Codes:**

| Waste Code | Subcategory Description | Treatment Standard 268.40 (check if applicable) | Or    | Technology Code (if applicable, enter treatment code) |
|------------|-------------------------|---|-------|---|
| _____      | _____                   | _____   | _____ | _____   |
| _____      | _____                   | _____   | _____ | _____   |
| _____      | _____                   | _____   | _____ | _____   |

# GENERATOR NOTIFICATION TO RECLAIMED ENERGY OF LAND DISPOSAL RESTRICTIONS

## Part I Generator Information

Generator: Lucas Oil Products EPA ID#: Exempt  
 Wastestream #: 16916 Wastewater: \_\_\_\_\_ Non-wastewater: X  
 Manifest Number: 249150 401 Manifest Line #: 9b.1 X 9b.2 \_\_\_\_\_ 9b.3 \_\_\_\_\_ 9b.4 \_\_\_\_\_  
 Signature Statement: All of the information in this document is complete and accurate to the best of my knowledge and information  
 Signature: Pick AD Title: Supervisor Date: 9-14-16

## Part II Treatment Standards for Characteristic Waste

\_\_\_\_\_ D001 High TOC subcategory that are managed in Non-CWA/ Non-CWA equivalent/Nonclass I SDWA systems

✓ D001 High TOC Ignitable characteristic liquids subcategory – greater than or equal to 10% TOC

| Waste Code | Metal    | Concentration | Waste Code | Metal    | Concentration |
|------------|----------|---------------|------------|----------|---------------|
| D004       | Arsenic  | 5.0 mg/l      | D008       | Lead     | 5.0 mg/L      |
| D005       | Barium   | 100.0 mg/L    | D009       | Mercury  | 20 mg/L       |
| D006       | Cadmium  | 1.0 mg/L      | D010       | Selenium | 5.7 mg/L      |
| D007       | Chromium | 5.0 mg/L      | D011       | Silver   | 5.0 mg/L      |

This waste must be treated so that it meets universal treatment standards for 1) constituent that caused the waste to be identified a hazardous and 2) all other underlying hazardous constituents listed in 40 CFR 268.48.

List individual waste codes: \_\_\_\_\_

This waste is hazardous only because it exhibits the following TC organic waste codes(S): \_\_\_\_\_ and must be treated to the treatment standards under 268.40 and the individual treatment standards at 268.48 for the subset of underlying hazardous constituents listed below:

List individual thc: \_\_\_\_\_

NOTE: This notification is required by 40 CFR 268.7. It is to be attached to the manifest for the initial shipment of each hazardous waste stream to Reclaimed Energy. A copy is to be retained by the generator for three years.

Part III Treatment Standards for Listed Wastes (check codes that apply)

F001

F002

F003

F004

F005

| Check if Applicable                 | Regulated Hazardous Constituent       | CAS Number | Wastewater Conc. (mg/L) | Non Wastewater Conc. (mg/L) |
|-------------------------------------|---------------------------------------|------------|-------------------------|-----------------------------|
| <input checked="" type="checkbox"/> | Acetone                               | 67-64-1    | 0.28                    | 160.0                       |
|                                     | Benzene                               | 71-43-2    | 0.14                    | 10.0                        |
|                                     | n-Butyl Alcohol                       | 71-36-3    | 5.6                     | 2.6                         |
|                                     | Carbon Disulfide                      | 75-15-0    | 3.8                     | 4.8 mg/L TCLP               |
|                                     | Carbon Tetrachloride                  | 56-23-5    | 0.057                   | 6.0                         |
|                                     | Chlorobenzene                         | 108-90-7   | 0.057                   | 6.0                         |
|                                     | m-Cresol                              | 108-39-4   | 0.77                    | 5.6                         |
|                                     | o-Cresol                              | 95-46-7    | 0.11                    | 5.6                         |
|                                     | Cyclohexanone                         | 108-94-1   | 0.36                    | 0.75 mg/L TCLP              |
|                                     | p-Cresol                              | 106-44-5   | 0.77                    | 5.6                         |
|                                     | o-Dichlorobenzene                     | 95-50-1    | 0.088                   | 6.6                         |
|                                     | Ethyl acetate                         | 141-78-6   | 0.34                    | 33                          |
|                                     | Ethyl benzene                         | 100-41-4   | 0.057                   | 10                          |
|                                     | Ethyl Ether                           | 60-29-7    | 0.12                    | 160                         |
|                                     | Isobutyl Alcohol                      | 78-83-1    | 5.6                     | 170                         |
|                                     | Methanol                              | 67-56-1    | 5.6                     | 0.75 mg/L TCLP              |
|                                     | Methylene Chloride                    | 75-09-2    | 0.089                   | 30                          |
|                                     | Methyl Ethyl Ketone                   | 78-93-3    | 0.28                    | 36                          |
|                                     | Methyl Isobutyl Ketone                | 108-10-1   | 0.14                    | 33                          |
|                                     | Nitrobenzene                          | 98-95-3    | 0.068                   | 14                          |
|                                     | Pyridine                              | 110-86-1   | 0.014                   | 16                          |
|                                     | Tetrachloroethylene                   | 127-18-4   | 0.056                   | 6.0                         |
|                                     | Toluene                               | 108-88-3   | 0.08                    | 10                          |
|                                     | 1,1,1 Trichloroethane                 | 71-55-6    | 0.054                   | 6.0                         |
|                                     | 1,1,2 Trichloroethane                 | 79-00-5    | 0.054                   | 6.0                         |
|                                     | Trichloroethylene                     | 79-01-6    | 0.054                   | 6.0                         |
|                                     | 1,1,2-trichloro 1,2,2-trifluoroethane | 76-13-1    | 0.057                   | 30                          |
|                                     | Trichloromonofluoromethane            | 75-69-4    | 0.02                    | 30                          |
|                                     | Xylenes (total)                       | 1330-20-7  | 0.32                    | 30                          |

Other Listed Codes:

Waste Code

Subcategory  
Description

Treatment Standard 268.40  
(check if applicable)

Or

Technology Code (if applicable,  
enter treatment code)

|       |       |       |       |
|-------|-------|-------|-------|
| _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ |

## Ray Burns

---

**From:** Rich Unferdorfer  
**Sent:** Monday, June 24, 2024 1:16 PM  
**To:** Ray Burns  
**Subject:** Fw: Building plans

Hi Ray, here is the Email between Mike Kurz and I, Mike is the Harrison County EMA Director.

---

## **LUCAS OIL**

**Rich Unferdorfer** | Safety Director  
3199 Harrison Way NW | Corydon, IN 47112  
O: 812-705-6124 | [runferdorfer@lucasoil.com](mailto:runferdorfer@lucasoil.com)

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**From:** Mike Kurz <[mkurz@harrisoncounty.in.gov](mailto:mkurz@harrisoncounty.in.gov)>  
**Sent:** Thursday, September 14, 2023 11:16 AM  
**To:** Rich Unferdorfer <[runferdorfer@lucasoil.com](mailto:runferdorfer@lucasoil.com)>  
**Subject:** RE: Building plans

**Caution:** This is an external email and may have harmful content.

Rich,  
Thank you so much for the update. I want you to know how much I appreciated the tour. It was so beneficial to me to see the operations, and to add, I was very impressed with the environment and system controls you have in place. Appreciate the partnership

---

**From:** Rich Unferdorfer <[runferdorfer@lucasoil.com](mailto:runferdorfer@lucasoil.com)>  
**Sent:** Thursday, September 14, 2023 10:29 AM  
**To:** Mike Kurz <[mkurz@harrisoncounty.in.gov](mailto:mkurz@harrisoncounty.in.gov)>  
**Subject:** Building plans

Hi Mike, we have not forgotten you , our Maintenance Supervisor is updating our files before we send them over to you for your Pre plans. Have a great week. Rich

## **LUCAS OIL**

**Rich Unferdorfer** | Safety Director  
3199 Harrison Way NW | Corydon, IN 47112  
O: [812-705-6124](tel:812-705-6124) | [runferdorfer@lucasoil.com](mailto:runferdorfer@lucasoil.com)

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H