

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





Facility ID

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		

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	C Yes • 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		
Manifests Waste Analysis Land Disposal Not Annual/Biennial Re Waste Analysis Re		n		
Comments				

	V _V	Vaste Managemo	ent					
Comments:								
Waste Stream(s) Inform	nation							
Waste Streams ● Yes ○ No ○ No	ot Inspected C Not Applie	cable						
	ation that varies from the most nt increase/decrease in genera		port (Exam	ple: add	ditional	waste stream	ms, w	aste streams no
EPA Waste Codes		Description	Source		Gen	neration Ra	ate	Disposition
D001 - Ignitable, D002 non-halogenated solver	- Corrosive, F003 - Spent nts (ignitable)	Lab Chemical	Laborato Testing	ory	40 pounds/month		nth	Clean Earth
Non-hazardous		Band Coating	Lubricati	ation - · ·		5-400 ons/month		Clean Earth
Exempted/Excluded		Inspected C N	Not Applic	able				
	Explanation							
Explanation	Scrap Metal 329 IAC 3.1-	6-4						
Waste Management Are	eas							
Container Management	t Area(s) Yes No	Not inspec	cted 🖺	Not ap	plicabl	е		
EPA Waste Codes			Locatio	n Nu	mber	Size		pe of ntainer
D001 - Ignitable, D002 - Corrosive, F003 - Spent no halogenated solvents (ignitable)		on-	CAA	1		55 gallon	Pla	stic
Satellite Area(s)	Yes □ No □ Not	inspected C N	Not applica	able				
EPA Waste Codes				Locat	ion	Commen	ts	

D001 - Ignitable, D002 - Corrosive, F003 - Spent nor solvents (ignitable)	n-halogenated	Laboratory	1 x 450ml flask ; No violation(s)	
Tanks, Restricted Waste Sites, and Other Regulate ☐ Yes O O Not inspected O Not applica	<u> </u>			
Environmental Releases				
Visible Releases/Contamination/Discharges	Yes No Release	Observed		
	pliance Assistance			
P2 Information The following P2 suggestions could possibly save money, re	educe waste and/or minir	nize risk. You n	night consider having a P2	
assessment, or a voluntary technical assistance consultation http://www.in.gov/idem/5298.htm for additional information.				
-	No No			
P2 Suggestions				
Guidance Materials				
Guidance Materials Provided to Facility				
	Checklist			
(Checked box i Standards	indicates a compliance cor TSDF Permit Rec			
Hazardous Waste Determination		Requirements	3	
Recordkeeping (SQG and LQG)	☐ Other Violation	on		
☐ Identifying Hazardous Waste Numbers (SQG and LQG)	t			
☐ Generator Category Determination				
☐ Notification (SQG, LQG, Transporter, TSDF)				
Release to the Environment, Disposal of Solid Waste				
☐ Illegal Dumping				
☐ Other Violation				
	-			
LQG Hazardous Waste Standards Accumulate for 90 Days or Less	SQG Hazardous			
Container Condition		☐ Accumulate for 180 Days or Less ☐ Accumulation Limit		
Compatibility of Waste with Container	Container Co			
Containers Closed		Compatibility of Waste with Container		
☐ Container Handling	Containers C			
Central Accumulation Area Inspection	☐ Container Ha	ndling		

Kaleb Spears

Page 3 of 6

Monosol LLC/Wednesday, June 26, 2024

Gonditions for Accumulation of Incompatible Wastes	Ignitable or Reactive Wastes - Distance from	Central Accumulation Area Inspections
Ignition/Reaction: "No Smoking" signs Conditions for Accumulation of Incompatible Wastes Container Marked with Indication of Hazards Container Marked with Accumulation Start Date Tank Integrity Assessment Tank Integrity Assessment Tank Containment and Detection of Releases Tank Inspections Tank Containment and Detection of Releases Tank Inspections Tank Subpart BB - Monthly Pump and Valve Monitoring Tank Subpart BB - Monthly Pump and Valve Monitoring Tank Subpart BB - Monthly Pump and Valve Monitoring Tank Labeled "Hazardous Waste" Tank Marked with Indication of Hazards Tank Documentation for 90-Day Accumulation Maintenance and Operation of Facility Required Equipment Testing and Maintenance of Equipment Aisle Space Arrangements with Local Authorities Arrangements with Local Authorities Arrangements with Local Authorities Content of Contingency Plan Contingency Plan Quick Reference Guide Emergency Coordinator Personnel Training Program Personnel Training Annual Review Personnel Training Annual Review Personnel Training Documentation Notification for Closure Land Disposal Restrictions	Property Line	Conditions for Accumulation of Incompatible Wastes
Container Marked with Accumulation Start Date Container Marked with Indication of Hazards Containers Marked with Indication of Hazards Containers Marked with Accumulation Start Date Tank Integrity Assessment Tank Integrity Assessment Tank Containment and Detection of Releases Tank General Operating Requirements Tank Containment and Detection of Releases Tank Inspections Tank Inspections Tank Subpart BB - Monthly Pump and Valve Monitoring Tank Subpart CC - Annual Inspection/Monitoring Tank Labeled "Hazardous Waste" Tank Marked with Indication of Hazards Tank Documentation for 90-Day Accumulation Maintenance and Operation of Facility Required Equipment Testing and Maintenance of Equipment Aisle Space Arrangements with Local Authorities Arrangements with Local Authorities Arrangements with Local Authorities Contingency Plan Developed Content of Contingency Plan Copies of Contingency Plan Contingency Plan Quick Reference Guide Emergency Coordinator Personnel Training Program Personnel Training Annual Review Personnel Training Annual Review Personnel Training Documentation Notification for Closure Land Disposal Restrictions		Container Labeled "Hazardous Waste"
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Tank Inspections	☐ Tank Containment and Detection of Releases	☐ Tank Documentation for 180-Day Accumulation
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Testing and Maintenance of Equipment Aisle Space Arrangements with Local Authorities Arrangements with Local Authorities - Documentation Contingency Plan Developed Content of Contingency Plan Copies of Contingency Plan Contingency Plan Quick Reference Guide Emergency Coordinator Personnel Training Program Personnel Training Annual Review Personnel Training Documentation Personnel Training Record Retention Notification for Closure Land Disposal Restrictions □ Other Small Quantity Generator Standards ∨SQG Standards □ Hazardous Waste Generation Limit □ Hazardous Waste Determination □ Proper Disposal □ Prohibited Disposal of Liquids in Landfills	Required Equipment	
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Contingency Plan Developed Content of Contingency Plan Copies of Contingency Plan Contingency Plan Quick Reference Guide Emergency Coordinator Personnel Training Program Personnel Training - Complete Within Six Months Personnel Training Annual Review Personnel Training Documentation Personnel Training Record Retention Notification for Closure Land Disposal Restrictions		l :
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Copies of Contingency Plan Contingency Plan Quick Reference Guide Emergency Coordinator Personnel Training Program Personnel Training - Complete Within Six Months Personnel Training Annual Review Personnel Training Documentation Personnel Training Record Retention Notification for Closure Land Disposal Restrictions		☐ Hazardous Waste Determination
Contingency Plan Quick Reference Guide Emergency Coordinator Personnel Training Program Personnel Training - Complete Within Six Months Personnel Training Annual Review Personnel Training Documentation Personnel Training Record Retention Notification for Closure Land Disposal Restrictions	_	Proper Disposal
Personnel Training Program Personnel Training - Complete Within Six Months Personnel Training Annual Review Personnel Training Documentation Personnel Training Record Retention Notification for Closure Land Disposal Restrictions		☐ Prohibited Disposal of Liquids in Landfills
Personnel Training - Complete Within Six Months Personnel Training Annual Review Personnel Training Documentation Personnel Training Record Retention Notification for Closure Land Disposal Restrictions	☐ Emergency Coordinator	
Personnel Training - Complete Within Six Months Personnel Training Annual Review Personnel Training Documentation Personnel Training Record Retention Notification for Closure Land Disposal Restrictions	☐ Personnel Training Program	
Personnel Training Documentation Personnel Training Record Retention Notification for Closure Land Disposal Restrictions	☐ Personnel Training - Complete Within Six Months	
☐ Personnel Training Record Retention ☐ Notification for Closure ☐ Land Disposal Restrictions	☐ Personnel Training Annual Review	
☐ Notification for Closure ☐ Land Disposal Restrictions	☐ Personnel Training Documentation	
☐ Notification for Closure ☐ Land Disposal Restrictions	_	
Land Disposal Restrictions	_	
	☐ Land Disposal Restrictions	

Quantity Limits, Point of Generation, Under Control	Manifest General Requirements
of Operator Container Condition	☐ Use of the Manifest
Compatibility with Container	
Incompatible Wastes	
Containers Closed	
Container Labeled "Hazardous Waste"	
Container Marked with Indication of Hazards	
Preparedness and Prevention	
Excess Generation	
Episodic Generation Notification	Hazardous Secondary Materials ☐ Reclaimed Under Control of the Generator
☐ EPA ID Number	☐ Contained
Accumulate for 60 Days or Less	☐ Speculative Accumulation
Accumulation Prohibitions	□ Notice
Container Labeling	☐ Documentation of Legitimacy Determination
Tank Labeling and Recordkeeping	☐ Emergency Preparedness and Response
Recordkeeping	☐ Emergency Procedures (Accumulates 6,000 kg or Less)
Preparedness and Prevention	Emergency Procedures (Accumulates Greater than 6,000 kg)
Other Violation	Other Violation
Solvent-Contaminated Wipes – Disposal	Solvent-Contaminated Wipes - Laundered or Dry Cleaned
Container Management (Non-leaking containers)	Container Management (Non-leaking containers)
Closed Containers	Closed Containers
Labeling	Labeling
Accumulation Time	Accumulation Time
No Free Liquids	☐ No Free Liquids
Free Liquids Management	Free Liquids Management
☐ Documentation	☐ Documentation
Final Disposition	☐ Clean Water Act
Universal Waste – All Facilities Universal Waste Labeling	Used Oil − All Facilities ☐ Rebuttable Presumption Applies
Containers - Closed, Good Condition, No Evidence	Containers and Tanks in Good Condition
of Leaks	Containers/Tank Labeling
Universal Waste - Bulb Crushing Prohibition	Release Clean Up and Containment
	☐ Burning Restrictions - Generated On-site or DIY, .5M BTU

Description of Violation(s)

	Inspection Documentation
Photographs	☐ Yes ☐ No
Мар	C Maps
GPS Location Collected	☐ Yes ☐ No
Analytical Screening Conducted	☐ Yes ☐ No
Lab Sample	○ Yes No

	Inspection Results/Actions			
Comments:				
Inspection R	Inspection Results			
No Violation(s) Discovered				
Multi-Media Concerns				
No concerns noted				

Finalize Inspection				
Written Summary of Inspection	Notice of Inspection and Verbal Summary Provided			
	Printed/Typed Name	Kaleb Spears		
	Phone Number:	(317) 903-1822		
Inspector Information	Email Address:	kspears@idem.in.gov		
	Signature:	Obtained on the Inspection Verification/Findings Form		
	Printed/Typed Name: Paul Brooks			
Facility Representative Signature	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 <u>6/16/14</u> an inspection of <u>Monos</u> Environmental Management (IDEM), Office of	was conducted fland Quality.	ed by the undersigned representative	of the Indiana Department of
Type of Inspection (may include more than	one):		
Routine Compliance Evaluation Follow Up Inspection Compliance Assistance Inspection		☐ Complaint ☐ Multi-Media Screening Evalua ☐ Other:	
Inspection Findings: These findings are considered preliminary and designated agent of IDEM believes may be a v	l identify specific complianc violation of a statute(s), rule(e issues discovered during the above (s) or permit(s) issued by IDEM.	e-noted inspection that the
No violations were discovered with respect Violations were discovered but corrected d Violations were discovered and require a si Violations were discovered and may subject Additional information/review is required to Other/Comments (attachment may be included)	luring the inspection. ubmittal from you and/or fo ct you to an appropriate enfo to evaluate overall complian	llow-up inspection by IDEM. rcement response.	
********************************** Confidential Information In accordance with 329 IAC 6.1 (http://www.department for which confidential treatment information. A person may request confidential the department, such as inspections. The writer accurate identification of the information information must be submitted to the commiconfidential is acquired by the department. A information and the supporting information identify all confidential claim materials. Concharts, photographs, or samples (see definitial alleged information acquired during this inspire the "does" box is not a written claim for confidential in accordance with IC 13-14-5 an oral report of inspection. The oral report includes any specific violation of a law or of a permit issued by the offact that indicates an intentional, a knowing, or	w.in.gov/legislative/iac/T03 t is requested shall make a stal treatment of informatic itten claim for confidential in claimed to be confidential issioner within five (5) wo A person submitting a claim to which the claim applies infidential information at 329 L pection does do confidential treatment of in of the inspection was provide in matters discovered during department. The report does	example 290/A00061.PDF) a person submitted a person at the time the information is actreatment may be broad, but must l. In accordance with 329 IAC 6.1 ricking days from the time the information of confidentiality shall designate in a manner that is sufficiently clearly include (but is not limited to) write AC 6.1-2-8). The undersigned Owner of the confidential during this instantial acquired during this instantial to the undersigned Owner/Agent at the inspection that the IDEM representation acquired the IDEM representation acquired that the IDEM representation acquired the inspection that the IDEM representation acquired the IDEM representat	itting information to the the time of submittal of the equired through the actions of the sufficiently clear to allow -4-1(d), supporting mation claimed as and segregate the ear to allow the department to teen or printed material, maps, where mere the eart of the example of the sentative believes may be a
IDEM Representative:			
Printed Name 317-903-1822 Phone Number	Signature KSpew 5@ idu Email	Nin. go	C/26/24 Date 1150m/ 4130pm Time In Out
Owner/Representative: First Beofus Printed Name 219-716-4017 Phone Number	Signature PAulo brooks	Dkumany.com	Env. Cooldinates Title Col26/24 Date

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