



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

June 28, 2019

VIA EMAIL

Mr. Michael Jones
EHS Specialist
Pilkington North America Inc.
1001 Hurricane St.
Franklin, IN 46131

Dear Mr. Jones:

Re: Violation Letter
Pilkington North America Inc.
IND006414783
Franklin, Johnson County

On 6/25/2019, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Pilkington North America Inc., located at 1001 Hurricane St., Franklin, 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 and require a submittal.

Within thirty (30) days of receipt of this letter, a written detailed explanation, documenting compliance with each of the requirements listed in the inspection report, must be submitted to this office. Failure to respond adequately to this Violation Letter may result in a referral to the OLQ Enforcement Section. Please direct any response to this letter and any questions to Celeste Marroni at (463) 221-8186. Thank you for your attention to this matter.

Sincerely,

Mike Ruyter for Susan Lowry

Susan Lowry
Section Chief
Hazardous Waste Compliance Section
Compliance Branch

Enclosure

cc: Johnson County Health Department



A State that Works



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

Inspector's Name:	Celeste Marroni
Others Present	
Date:	Tuesday, June 25, 2019
Time In:	9:30 AM
Time Out:	12:10 PM
Inspection Type	Compliance Evaluation Inspection

General Information

Facility Information

Facility Name	Pilkington North America Inc.
Facility Location	1001 Hurricane St. Franklin, IN 46131 Johnson County
Facility Mailing Information	Same Address as Facility
Facility Contact	Mike Jones (419)309-0223 Environmental Health & Safety Specialist michael.jones@nsg.com
Primary Facility Contact During Inspection	Brittney Bellows Materials Supervisor brittney.bellows@nsg.com
Other Facility Contact(s) During Inspection	

Facility ID

EPA ID Number	IND006414783	NAICS Code	3231, 3272, 327215
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Facility Status

File Status	Small Quantity Hazardous Waste Generator	Other Activities	
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Outstanding Issues

Last Inspection Date	8/8/2012
Previous Violations	<input type="radio"/> Yes <input checked="" type="radio"/> No
Details	

Inspection Narrative

Pilkington North America Inc. is a glass manufacturing company that specializes in the advanced assembly of hardware on windshields, side lights, and windows for automobiles. The facility adds components to glass such as clips, foam, and terminals. The facility is roughly 60,000 sq. ft. and employs 107 workers on 2 shifts all week. Pilkington North America Inc. has been in operation at this location since 2012.

Pilkington North America Inc. has several cells where different glass assembly operations take place. The cells differ in production based on the specific processes needing to be completed. One process that generates hazardous waste is priming clip components for assembly. The primer coated clip is attached to a piece of glass and held in storage until ready to be shipped for distribution. The hazardous waste that is generated at the facility is from primer/ urethane contaminated PPE and unused primer for the clip-glass process.

The inspection consisted of an opening conference, facility tour, record review, and closing conference. During the facility tour, all of the production cells were inspected. Each cell contained one 5.3 gallon satellite container with contaminated PPE waste (D001, D035) solids. There were 12 incorrectly labeled satellite containers on site during the inspection. The hazardous waste storage area was empty due to a recent pick up by Resource One on 6/21/19. The facility had no record

Celeste Marroni

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Pilkington North America Inc./Tuesday, June 25, 2019

of who the appointed emergency coordinator was and lacked the proper emergency information posted. During the record review, the 2018-present "Designated Facility to Generator" manifests were not being received or kept by the facility.

Violations were observed and require a submittal within 30 days to this office.

Regulatory Status	
Observed Activity	Small Quantity Generator
Documents Reviewed	Manifests Training Records Land Disposal Notification Weekly Hazardous Waste Inspections Emergency Action Plan
Comments	

Waste Management					
Comments:					
Waste Stream(s) Information					
Waste Streams <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not Inspected <input type="radio"/> Not Applicable					
List waste stream(s) information that varies from the most recent Annual Report (Example: additional waste streams, waste streams no longer generated, significant increase/decrease in generation rate, etc.)					
EPA Waste Codes	Description	Source	Generation Rate	Disposition	
See most recent manifest report					
Exempted/Excluded	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not Inspected <input type="radio"/> Not Applicable				
Explanation					
Waste Management Areas					
Container Management Area(s)	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not inspected <input type="radio"/> Not applicable				
EPA Waste Codes	Location	Number	Size	Type of Container	
D001, D035	Clip Line	1	55-gallon	Metal	
Waste Fluorescent Lamps	Hazardous Waste Storage Area	2	4-Ft	Cardboard Box	
Satellite Area(s)	<input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Not inspected <input type="radio"/> Not applicable				
EPA Waste Codes	Location	Comments			
D001, D035	Clip Line	One 5.3-gallon container with contaminated PPE			
D001, D035	Cells 1-10	Ten 5.3-gallon container with contaminated PPE			
D001, D035	Civic Cell	One 5.3-gallon container with contaminated PPE			
Tanks, Restricted Waste Sites, and Other Regulated Units <input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> Not inspected <input type="radio"/> Not applicable					

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

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Compliance Assistance		
P2 Information		
The following P2 suggestions could possibly save money, reduce waste and/or minimize risk. You might consider having a P2 assessment, or a voluntary technical assistance consultation from IDEM staff. Please visit the agency's P2 web site at http://www.in.gov/idem/5298.htm for additional information.		
Contact by IDEM OPPTA Requested	<input type="radio"/> Yes <input checked="" type="radio"/> No	
P2 Suggestions		

Guidance Materials	
Guidance Materials Provided to Facility	

Checklist (Checked box indicates a compliance concern)	
Standards <input type="checkbox"/> Hazardous Waste Determination <input type="checkbox"/> EPA Identification Number(s) <input type="checkbox"/> Manifest General Requirements <input checked="" type="checkbox"/> Use of the Manifest <input type="checkbox"/> Biennial Report	Satellite Accumulation – SQG and LQG <input type="checkbox"/> Satellite Accumulation - 55 Gallon <input checked="" type="checkbox"/> Satellite Accumulation - Label <input type="checkbox"/> Satellite Containers Closed
Container Management – LQG <input type="checkbox"/> Accumulated On-site for 90 Days or Less <input type="checkbox"/> Hazardous Waste Container Condition <input type="checkbox"/> Hazardous Waste Container Compatibility <input type="checkbox"/> Hazardous Waste Containers Closed <input type="checkbox"/> Hazardous Waste Container Handling <input type="checkbox"/> Hazardous Waste Container Inspections <input type="checkbox"/> Accumulation Start Date Clearly Marked and Visible <input type="checkbox"/> Marked Clearly with Words "Hazardous Waste"	Container Management – SQG <input type="checkbox"/> Accumulate for 180 Days or Less <input type="checkbox"/> May not Exceed 6000 Kg (13,200 Lbs) <input type="checkbox"/> Hazardous Waste Container Condition <input type="checkbox"/> Hazardous Waste Container Compatibility <input type="checkbox"/> Hazardous Waste Containers Closed <input type="checkbox"/> Hazardous Waste Container Handling <input type="checkbox"/> Hazardous Waste Container Inspection <input type="checkbox"/> Accumulation Start Date Clearly Marked and Visible <input type="checkbox"/> Marked Clearly with the Words "Hazardous Waste"
Preparedness and Prevention – LQG and SQG <input type="checkbox"/> Maintained and Operated to Minimize Possibility of a Release <input type="checkbox"/> Required Equipment <input type="checkbox"/> Communication & Alarm Access <input type="checkbox"/> Aisle Space	Contingency Plan and Emergency Procedures – LQG <input type="checkbox"/> Contingency Plan Developed <input type="checkbox"/> Contingency Plan Content <input type="checkbox"/> Contingency Plan Maintained at Facility
Personnel Training – LQG <input type="checkbox"/> Personnel Training	Training and Emergency Procedures – SQG <input checked="" type="checkbox"/> SQG Emergency Coordinator <input checked="" type="checkbox"/> Emergency Information Posted <input type="checkbox"/> Employee Training
Tank Requirements – LQG	Used Oil – All Facilities

<input type="checkbox"/> Integrity Assessment <input type="checkbox"/> Containment and Release Detection <input type="checkbox"/> Tank General Requirements <input type="checkbox"/> Tank Inspections <input type="checkbox"/> Subpart BB - Monthly Pump and Valve Monitoring <input type="checkbox"/> Subpart CC - Annual Inspection/Monitoring	<input type="checkbox"/> Rebuttable Presumption Applies <input type="checkbox"/> Containers and Tanks in Good Condition <input type="checkbox"/> Containers/Tank Labeling <input type="checkbox"/> Release Clean Up and Containment <input type="checkbox"/> Burning Restrictions - Generated On-site or DIy, .5M BTU
Additional Requirements – LQG and SQG <input type="checkbox"/> Release to the Environment, Disposal of Solid Waste <input type="checkbox"/> Illegal Dumping <input type="checkbox"/> Land-Ban Notification <input type="checkbox"/> Other Violation	Universal Waste – All Facilities <input type="checkbox"/> Universal Waste Labeling <input type="checkbox"/> Containers - Closed, Good Condition, No Evidence of Leaks <input type="checkbox"/> Universal Waste - Bulb Crushing Prohibition
Solvent-Contaminated Wipes - Laundered or Dry Cleaned <input type="checkbox"/> Container Management (Non-leaking containers) <input type="checkbox"/> Closed Containers <input type="checkbox"/> Labeling <input type="checkbox"/> Accumulation Time <input type="checkbox"/> No Free Liquids <input type="checkbox"/> Free Liquids Management <input type="checkbox"/> Documentation <input type="checkbox"/> Clean Water Act	Solvent-Contaminated Wipes – Disposal <input type="checkbox"/> Container Management (Non-leaking containers) <input type="checkbox"/> Closed Containers <input type="checkbox"/> Labeling <input type="checkbox"/> Accumulation Time <input type="checkbox"/> No Free Liquids <input type="checkbox"/> Free Liquids Management <input type="checkbox"/> Documentation <input type="checkbox"/> Final Disposition

Description of Violation(s)
STANDARDS
USE OF THE MANIFEST CITATION: 40 CFR 262.23(a)(3) and 40 CFR 262.40(a) (Use of the Manifest): The generator must retain copies of hazardous waste manifests for a period of three (3) years from the date of receipt of the hazardous waste by the TSD. DETAILS: The facility did not have the Designated Facility to Generator signed copies of their manifest from 2018-present. REQUIRED ACTION: Obtain copies of the signed manifests specified above. Retain copies of the manifests on-site for a period of at least three (3) years. Within thirty (30) days, submit to this office all of the signed Designated Facility to Generator Manifests from 2018-present. In the future, keep all signed manifest copies at the facility or be able to access through EPA E-Manifest for up to three years.
SATELLITE ACCUMULATION - SQG AND LQG
SATELLITE ACCUMULATION - LABEL CITATION: 40 CFR 262.34(c)(1)(ii) (Marked with the words "Hazardous Waste" or other words that identify contents): A generator may accumulate as much as 55 gallons of hazardous waste in containers at or near the point of generation without a

permit and without complying with 40 CFR 262.34(a), provided that the containers are marked with either the words "Hazardous Waste" or with other words describing the contents.

DETAILS:

Twelve total 5.3-gallon contaminated PPE waste (D001,D035) containers were not properly labeled with the words "Hazardous Waste" located in Cells 1-10, CIVIC, and Clip Line.

REQUIRED ACTION:

Mark all satellite hazardous waste containers with the words "Hazardous Waste" or other words that identify the contents.

Within thirty (30) days, submit to this office photos of the satellite containers with the properly labeled words "Hazardous Waste".

TRAINING AND EMERGENCY PROCEDURES - SQG

SQG EMERGENCY COORDINATOR

CITATION:

40 CFR 262.34(d)(5)(i) (SQG Emergency Coordinator): At all times there must be at least one employee on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures specified. This employee is the emergency coordinator.

DETAILS:

There was no appointed primary emergency coordinator during the time of inspection. No employees on site were aware of the emergency coordinator position or who was appointed.

REQUIRED ACTION:

Designate a hazardous waste emergency coordinator that is on the premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures specified.

Within thirty (30) days, submit to this office an updated emergency action plan with the appropriate appointed primary emergency coordinator and alternate emergency coordinator. Please include names, home addresses, and phone numbers of these individuals.

EMERGENCY INFORMATION POSTED

CITATION:

40 CFR 262.34(d)(5)(ii) (Emergency Information Posted): The generator must post the following information next to the telephone: (1) The name and phone number of the emergency coordinator. (2) Location of fire extinguishers and spill control material, and, if present, fire alarm. (3) The telephone number of the fire department, unless the facility has a direct alarm.

DETAILS:

The facility lacked the required information to be posted by a telephone or by the safety communications area.

REQUIRED ACTION:

Post the required emergency information by the facility safety communications area.

Within thirty (30) days, submit to this office a photo of the posted updated Emergency Information Posted. You may use the copy left on site from the inspection.

Inspection Documentation




Photographs	<input checked="" type="radio"/> Yes <input type="radio"/> No
Map	<input checked="" type="radio"/> Maps
GPS Location Collected	<input type="radio"/> Yes

	<input checked="" type="radio"/> No	
Analytical Screening Conducted	<input type="radio"/> Yes <input checked="" type="radio"/> No	
Lab Sample	<input type="radio"/> Yes <input checked="" type="radio"/> No	

Inspection Results/Actions	
Comments:	
Inspection Results	
Violations were discovered and require a submittal.	
Multi-Media Concerns	
No concerns noted	

Finalize Inspection		
Written Summary of Inspection	Notice of Inspection and Verbal Summary Provided	
Inspector Information	Printed/Typed Name	Celeste Marroni
	Phone Number:	(463) 221-8186
	Email Address:	cmarroni@idem.in.gov
	Signature:	Obtained on the Inspection Verification/Findings Form
Facility Representative Signature	Printed/Typed Name:	Brittney Bellows
	Signature:	Obtained on the Inspection Verification/Findings Form

Photo Table

	Number	1
	Description	One 5.3-gallon satellite container of contaminated (D001, D035) waste without the proper words "Hazardous Waste" located in Cell 5.
	Photographer	Celeste Marroni
	Facility Name	Pilkington North America Inc.
	Photo Date	6/25/2019
	Others	Brittany Bellows
	Number	2
	Description	One 5.3-gallon satellite container of contaminated (D001, D035) waste without the proper words "Hazardous Waste" located in Cells 1-10.
	Photographer	Celeste Marroni
	Facility Name	Pilkington North America Inc.
	Photo Date	6/25/2019
	Others	Brittany Bellows
	Number	3
	Description	One 5.3-gallon satellite container of contaminated (D001, D035) waste without the proper words "Hazardous Waste" located in Cells 1-10.
	Photographer	Celeste Marroni
	Facility Name	Pilkington North America Inc.
	Photo Date	6/25/2019
	Others	Brittany Bellows

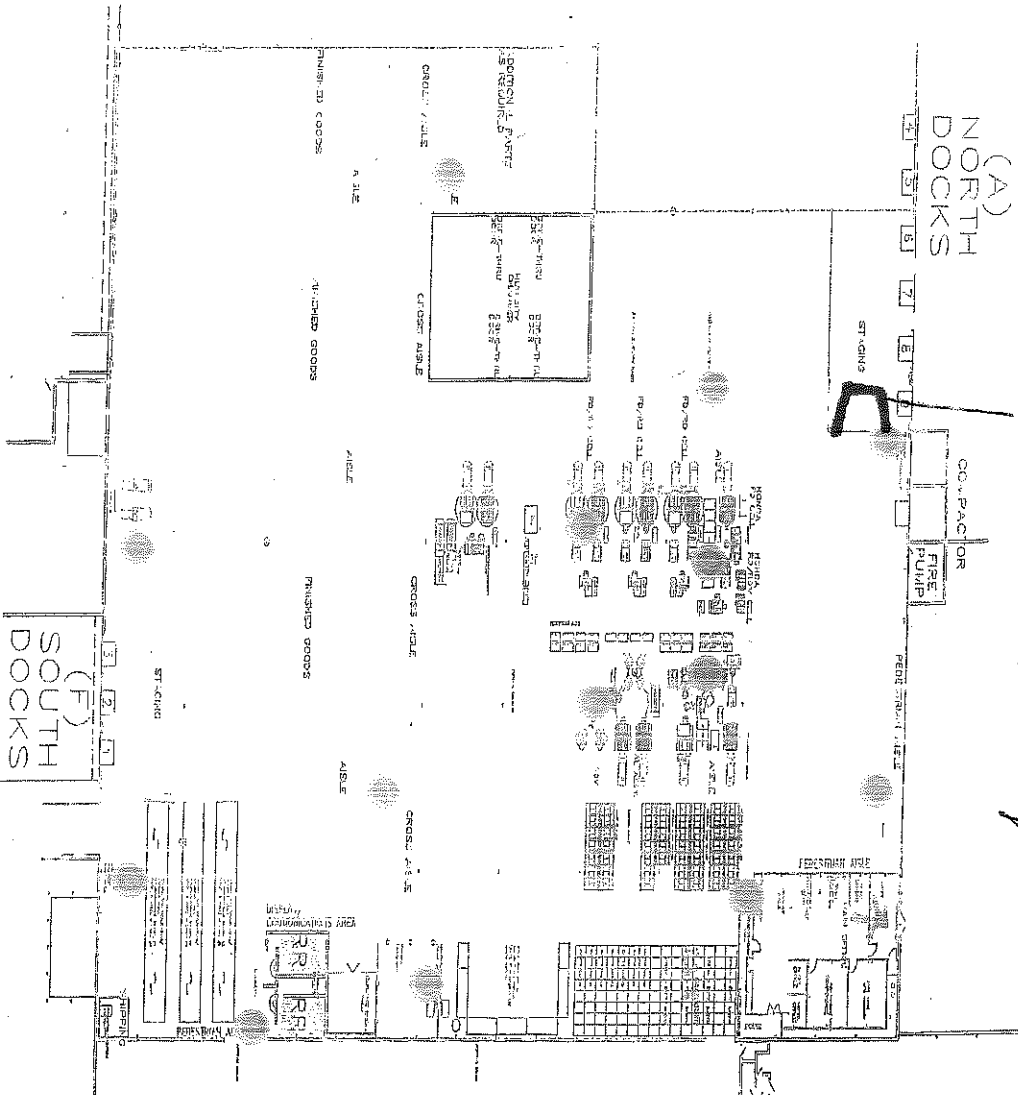


Number	4
Description	One 5.3-gallon satellite container of contaminated (D001, D035) waste without the proper words "Hazardous Waste" located in Cells 1-10.
Photographer	Celeste Marroni
Facility Name	Pilkington North America Inc.
Photo Date	6/25/2019
Others	Brittny Bellows

Fire Extinguisher Overlay

Fire Extinguisher A/B/C

Hazardous Waste Storage Area





INSPECTION
VERIFICATION/FINDINGS

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue

Indianapolis, Indiana 46204-2251

Telephone: (800) 451-6027 or (317) 232-8603

Web Page: <http://www.in.gov/idem/>

On 6/25/19 an inspection of Pilkington North America INC. was conducted by the undersigned representative of the Indiana Department of Environmental Management (IDEM), Office of Land Quality.

Type of Inspection (may include more than one):

- ☒ Routine Compliance Evaluation
☐ Follow Up Inspection
☐ Compliance Assistance Inspection
☐ Complaint
☐ Multi-Media Screening Evaluation
☐ Other: _____

Inspection Findings:

These findings are considered preliminary and identify specific compliance issues discovered during the above-noted inspection that the designated agent of IDEM believes may be a violation of a statute(s), rule(s) or permit(s) issued by IDEM.

- ☐ No violations were discovered with respect to the particular items observed during the inspection.
☐ Violations were discovered but corrected during the inspection.
☐ Violations were discovered and require a submittal from you and/or follow-up inspection by IDEM.
☐ Violations were discovered and may subject you to an appropriate enforcement response.
☒ Additional information/review is required to evaluate overall compliance.
☐ Other/Comments (attachment may be included): _____

Confidential Information

In accordance with 329 IAC 6.1 (<http://www.in.gov/legislative/iac/T03290/A00061.PDF>) a person submitting information to the department for which confidential treatment is requested shall make a written claim of confidentiality at the time of submittal of the information. A person may request confidential treatment of information at the time the information is acquired through the actions of the department, such as inspections. The written claim for confidential treatment may be broad, but must be sufficiently clear to allow for accurate identification of the information claimed to be confidential. In accordance with 329 IAC 6.1-4-1(d), supporting information must be submitted to the commissioner within five (5) working days from the time the information claimed as confidential is acquired by the department. A person submitting a claim of confidentiality shall designate and segregate the information and the supporting information to which the claim applies in a manner that is sufficiently clear to allow the department to identify all confidential claim materials. Confidential information may include (but is not limited to) written or printed material, maps, charts, photographs, or samples (see definition of information at 329 IAC 6.1-2-8). The undersigned Owner/Representative has alleged information acquired during this inspection ☐ does ☒ does not (check one) contain confidential information. A check in the "does" box is not a written claim for confidential treatment of information acquired during this inspection.

Notice of Oral Report

In accordance with IC 13-14-5 an oral report of the inspection was provided to the undersigned Owner/Agent at the conclusion of the inspection. The oral report includes any specific matters discovered during the inspection that the IDEM representative believes may be a violation of a law or of a permit issued by the department. The report does not include matters not evident to the IDEM representative or any fact that indicates an intentional, a knowing, or a reckless violation.

IDEM Representative:

Celeste Marroni
Printed Name

Celeste Marroni
Signature

6/25/19
Date

(463)221-8186
Phone Number

cmarroni@idem.in.gov
Email

9:30/12:00
Time In/ Out

Owner/Representative:

Brittney Bellows
Printed Name

Brittney Bellows
Signature

Materials Supervisor
Title

317-364-8429
Phone Number

brittney.bellows@DNB.com
Email

6-25-2019
Date

IDEM prefers to email your written report. Please check this box if you prefer to receive a copy of the inspection report via U.S. mail: ☐

EMANUEL, DONNA

From: Jones, Michael T <Michael.Jones@nsg.com>
Sent: Friday, June 28, 2019 10:37 AM
To: EMANUEL, DONNA
Subject: RE: Pilkington North America Inc.

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

Received

From: EMANUEL, DONNA [mailto:DEMANUEL@idem.IN.gov]
Sent: Friday, June 28, 2019 10:28 AM
To: Jones, Michael T <Michael.Jones@nsg.com>
Cc: eswearingen@co.johnson.in.us; Marroni, Celeste <CMarroni@idem.IN.gov>; Peterschmidt, Matthew R <MPetersc@idem.IN.gov>
Subject: (E) Pilkington North America Inc.

Dear Mr. Jones,

Attached is the "Compliance Evaluation Inspection/Violation Letter" that Ms. Celeste Marroni prepared for **Pilkington North America Inc.** which is located at **1001 Hurricane Street, Franklin, Johnson County, Indiana** for your review. **Once you have received this email would you please respond back to me (via e-mail) that you have received the document for our records.**

Thank you



Donna Emanuel
Administrative Assistant | Office of Land Quality
Indiana Department of Environmental Management

(317) 234-6923 | demanuel@idem.in.gov



<http://www.nsg.com/disclaimer>