



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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Eric J. Holcomb  
Governor

Bruno L. Pigott  
Commissioner

October 25, 2019

### VIA E-MAIL

Mr. Calvin Davidson  
Ray's Trash Service  
Drawer 1  
Clayton, IN 46118

Dear Mr. Davidson:

Re: Violation Letter  
Farnsworth Metal Recycling  
EPA ID: Non-notifier  
Indianapolis, Marion County

On October 17, 2019, representatives of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Farnsworth Metal Recycling, located at 3602 Farnsworth St., Indianapolis, Indiana. 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:	Legitimate Use
Results of Inspection:	Violations were observed (see attached inspection report).

Within thirty (30) days of receipt of this letter, a written detailed explanation, documenting compliance with each required action listed in the inspection report, must be submitted to this office. Please direct any response to this letter and any questions to Christopher Purvis at (317) 753-3273 or at [cpurvis1@idem.IN.gov](mailto:cpurvis1@idem.IN.gov). Thank you for your attention to this matter.

Sincerely,

Zaidoon Al-Saleem, Chief  
Industrial Waste Compliance Section  
Compliance and Response Branch  
Office of Land Quality

Enclosure

cc: Marion County Public Health Department

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF LAND QUALITY**  
Legitimate Use Inspection

**EPA ID NUMBER:** Non-notifier  
**NAME:** Farnsworth Metal Recycling  
**ADDRESS:** 3602 Farnsworth Street  
**CITY & COUNTY:** Indianapolis, Marion County  
**INSPECTION DATE:** October 17, 2019  
**INSPECTOR(S):** Christopher Purvis and Laura Rogers

<u><b>PERSONS</b></u>	<u><b>TITLE</b></u>	<u><b>TELEPHONE</b></u>
<u><b>INTERVIEWED</b></u>		
Caleb Coffin	Plant Manager	(317) 481-8501
Rick Sharpless	Consultant	N/A

**PRE-INSPECTION INFORMATION**

Farnsworth Metal Recycling has a legitimate use approval to use tear-off asphalt roofing shingles in Hot Mix Asphalt (HMA). They receive asbestos-free shingles from Ray's Trash Service in Clayton, IN, grind the shingles, and provide them to contractors to use in HMA. The most recent legitimate use approval was issued in 2017 and expires on June 1, 2020.

The previous legitimate use inspection occurred on May 11, 2017.

**INSPECTION FINDINGS**

On October 17, 2019, IDEM staff conducted a routine legitimate use inspection of Farnsworth Metal Recycling. Caleb Coffin and Rick Sharpless assisted staff with the inspection walkthrough. They advised IDEM staff that the facility had not received any shingles or sent any ground shingles off for re-use since 2017; however, whole and ground shingles remained on-site. IDEM staff measured the three piles of shingles still at the facility.

The first pile of ground shingles measured 56ft x 22ft x 8ft (volume  $\approx 9,856\text{ft}^3$ ). This pile was stored inside a barn.

The second pile of ground shingles measured 63ft x 61ft x 7ft (volume  $\approx 26,901\text{ft}^3$ ). This pile was stored outside, uncovered, and uncontained (photo 6).

There was a pile of whole shingles roughly in the shape of a triangular pyramid measuring 79ft x 79ft x 84ft x 12.5ft (volume  $\approx 15,676\text{ft}^3$ ) (photos 1 and 2). This pile was also uncovered.

IDEM staff may conduct additional measurements to the shingle piles in the future, to determine the accuracy of the current measurements.

Although no single pile exceeded  $50,000\text{ft}^3$  in volume one pile had a height exceeding 10ft which is not in accordance with condition 10 of the approval. Additionally, whole shingles must be completely covered with a tarp per condition 8 of the approval and the pile of whole shingles was not covered. It appears as though the tarps which had previously covered them had deteriorated. Thirdly, ground shingles must be stored in a building in accordance with condition 7 and the second pile of ground shingles was stored outside, uncovered, and uncontained. Lastly, condition 2 stipulates that if a market no longer exists then the use must cease. The facility has been storing shingles for HMA for approximately a year and half with no movement.

IDEM staff asked for the most recent asbestos testing, but considering they had not received loads for some time Farnsworth Metal Recycling did not have any records available during the inspection. However, Mr. Coffin advised IDEM staff that he would submit asbestos testing records between May 11, 2017 and the date the last load was received later that year.

When touring around the shingle piles, IDEM staff noticed heavy staining and active releases in various parts of the facility. Some of the staining occurred across from Building 3 (photo 3), additional staining and fluid releases were seen coming from an excavator adjacent to the whole shingle pile (photos 4 and 5), and more fluid releases were coming from residual oils remaining in vehicle parts like engine blocks being stored along a fence in front of the shingle pile. Mr. Coffin advised IDEM staff that the area next to the fence is routinely cleared out and cleaned up before additional scrap metal is placed there. The facility does have oil-dri on hand but there appeared to be no other response plan for releases. Mr. Coffin sent to IDEM staff later that same day an email with an attached photo documenting that oil-dri had been placed in the areas around the excavator (see attached); however, no other information regarding a response to the other areas had been submitted.

## **CONCLUSIONS AND RECOMMENDATIONS**

The facility is not following conditions 2, 7, 8, and 10 of their legitimate use approval issued on June 1, 2017. Additionally, please submit proof of asbestos testing in accordance with conditions 3 and 4. Failure to submit asbestos testing will result in further violations. Additionally, the facility is being cited for failure to respond to an oil spill. Please see the Description of Violations section for additional information.



Photo 1

Facility Name: Farnsworth Metal Recycling

Photographer: Christopher Purvis

Date: October 17, 2019

Others Present: Laura Rogers (IDEM), Caleb Coffin (facility), and Rick Sharpless (facility)

Description: A pile of whole shingles outside and uncovered. Pile A.



Photo 2

Facility Name: Farnsworth Metal Recycling

Photographer: Christopher Purvis

Date: October 17, 2019

Others Present: Laura Rogers (IDEM), Caleb Coffin (facility), and Rick Sharpless (facility)

Description: Pile A



Photo 3

Facility Name: Farnsworth Metal Recycling

Photographer: Christopher Purvis

Date: October 17, 2019

Others Present: Laura Rogers (IDEM), Caleb Coffin (facility), and Rick Sharpless (facility)

Description: Staining from previous releases and current releases on-site.





Photo 4

Facility Name: Farnsworth Metal Recycling

Photographer: Christopher Purvis

Date: October 17, 2019

Others Present: Laura Rogers (IDEM), Caleb Coffin (facility), and Rick Sharpless (facility)

Description: Heavy staining and fluid releases coming from the excavator.



Photo 5

Facility Name: Farnsworth Metal Recycling

Photographer: Christopher Purvis

Date: October 17, 2019

Others Present: Laura Rogers (IDEM), Caleb Coffin (facility), and Rick Sharpless (facility)

Description: Heavy staining and fluid releases from the excavator.



Photo 6

Facility Name: Farnsworth Metal Recycling

Photographer: Christopher Purvis

Date: October 17, 2019

Others Present: Laura Rogers (IDEM), Caleb Coffin (facility), and Rick Sharpless (facility)

Description: Ground shingles stored outside and uncovered. Pile C.

## Purvis, Christopher

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**From:** Caleb Coffin <ccoffin@farnsworthmetals.com>  
**Sent:** Thursday, October 17, 2019 4:20 PM  
**To:** Purvis, Christopher  
**Subject:** Pictures for IDEM  
**Attachments:** KIMG0107.JPG

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

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Oil Dry Pics

Thanks,

**Caleb Coffin**  
FARNSWORTH METAL RECYCLING  
317-419-0953 (c) | 317-481-8501 (o)  
[ccoffin@farnsworthmetals.com](mailto:ccoffin@farnsworthmetals.com)  
[www.raystrash.com](http://www.raystrash.com)



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## DESCRIPTION OF VIOLATION

**FACILITY NAME:** Farnsworth Metal Recycling

**EPA ID#:** Non-notifier

**ADDRESS:** 3602 Farnsworth St., Indianapolis, IN 46241

**Inspection Date:** October 17, 2019

Use of Tear-Off Asphalt Roofing Shingles, June 1, 2017, Condition 2: The use as described and managed below is limited to HMA. If it is determined that the use is no longer suitable or a market does not exist, the use must cease.

*Note: Mr. Coffin advised IDEM staff during the October 17, 2019 inspection that material had not been moved off-site or used as HMA in approximately a year and a half.*

**Required Action: Within thirty (30) days of receipt of this letter comply with Condition 2 of the legitimate use approval issued to your facility on June 1, 2017 by either finding a HMA use for the material that is on-site or dispose of the material at a state permitted solid waste facility. Submit to IDEM records documenting proper disposal.**

Use of Tear-Off Asphalt Roofing Shingles, June 1, 2017, Condition 7: Ground shingle material will be stored in a building. Piles are not to exceed condition 10.

*Note: During the October 17, 2019 inspection IDEM staff saw a pile of ground shingles measuring approximately 26,901ft<sup>3</sup> in volume. This pile was stored outside, uncovered, and uncontained.*

**Required Action: Within thirty (30) days of receipt of this letter comply with Condition 7 of the legitimate use approval issued to your facility on June 1, 2017 by either moving this pile of ground shingles inside a building or disposing of it at a state permitted solid waste facility. Submit to IDEM receipts documenting proper disposal.**

Use of Tear-Off Asphalt Roofing Shingles, June 1, 2017, Condition 8: Whole shingles will be stored in piles. The piles must be completely covered with a tarp and located on the interior of the property on an impervious surface (e.g. asphalt pad, concrete pad, etc.). In the event the shingles are found to be migrating to the property lines, the facility must comply with condition 9. Piles are not to exceed condition 10.

*Note: During the October 17, 2019 inspection, IDEM staff saw the pile of whole shingles outside did not have cover. Sections of tarp which had previously covered the pile appeared to have disintegrated.*

**Required Action: Within ten (10) days of receipt of this letter comply with Condition 8 of the legitimate use approval issued to your facility on June 1, 2017.**

Use of Tear-Off Asphalt Roofing Shingles, June 1, 2017, Condition 10: No shingle pile may exceed 50,000 ft<sup>3</sup> in volume. No shingle pile may exceed a height of 10 feet.

## DESCRIPTION OF VIOLATION

*Note: During the October 17, 2019 inspection, one of the three piles had a height of 12.5ft.*

**Required action: Within ten (10) days of receipt of this letter comply with Condition 10 of the legitimate use approval issued to your facility on June 1, 2017.**

### Used Oil Management

**329 IAC 13-4-3(e):** Upon detection of a release of used oil to the environment not subject to the requirements of 40 CFR 280 Subpart F, which has occurred after the effective date of this rule, a generator must perform the following clean-up steps:

- (1) Stop the release.
- (2) Contain the released used oil.
- (3) Clean up and manage properly the released used oil and other materials.
- (4) Communicate a spill report in accordance with 327 IAC 2-6.1.
- (5) If necessary to prevent future releases, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.

*Note: Several small sized fluid releases and heavy staining were noted. The releases and staining mainly occurred near Building 3 and the whole shingle pile. Mr. Coffin provided to IDEM staff via email a photo documenting that oil-dri had been placed on one of the areas which contained releases/staining, but no response information was provided on the other areas.*

**Required Action: Immediately clean-up, remove, and contain all spills and contaminated soil/debris resulting from spills and releases. Remove at least six (6) inches below visible contamination. Dispose of all waste and contaminated soil/debris in a state permitted municipal solid waste landfill. Within ten (10) days of receipt of this letter, submit a written response to IDEM, documenting proper disposal of the remediated waste as well as plans to prevent future contamination.**

## Christie, Kae

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**From:** Caleb Coffin <ccoffin@farnsworthmetals.com>  
**Sent:** Monday, October 28, 2019 9:27 AM  
**To:** Christie, Kae; Clint Hardin  
**Cc:** Purvis, Christopher; AL-SALEEM, ZAIDOOON; 'ptheveno@marionhealth.org'  
**Subject:** RE: Farnsworth Metal Recycling

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We have received the documents. Please remove Clint Hardin from the list. Please add Calvin Davidson instead (cdavidson@raystrash.com)

Thanks,

**Caleb Coffin**  
FARNSWORTH METAL RECYCLING  
317-419-0953 (c) | 317-481-8501 (o)  
[ccoffin@farnsworthmetals.com](mailto:ccoffin@farnsworthmetals.com)  
[www.raystrash.com](http://www.raystrash.com)



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**From:** Christie, Kae [mailto:KChristie@idem.IN.gov]  
**Sent:** Friday, October 25, 2019 2:24 PM  
**To:** Caleb Coffin <ccoffin@farnsworthmetals.com>; Clint Hardin <chardin@raystrash.com>  
**Cc:** Purvis, Christopher <CPurvis1@idem.IN.gov>; AL-SALEEM, ZAIDOOON <ZALSALEE@idem.IN.gov>; 'ptheveno@marionhealth.org' <ptheveno@marionhealth.org>  
**Subject:** Farnsworth Metal Recycling

Dear Mr. Calvin Davidson

Please find the attached document based on an inspection the Indiana Department of Environmental Management, Office of Land Quality, conducted on October 17, 2019, **please confirm you received the documents via-email.**

Thank you

Kae Christie



Department of Environmental Management  
Office of Land Quality  
IGCN, Rm 1101  
317-234-6951  
[kchristie@idem.in.gov](mailto:kchristie@idem.in.gov)

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