



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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

July 24, 2014

VIA CERTIFIED-MAIL

Mr. Kamal Hans
Zarda King Ltd.
33 East 35th Place
Steger, IL 60475

Re: E-waste Management
922 East Chicago Ave.
East Chicago, Lake County

Dear Mr. Hans:

On July 8, 2015, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of 922 East Chicago Avenue, East Chicago, 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: Enforcement Follow-Up

Result of Inspection: Remains Out of Compliance

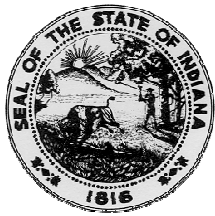
Within forty-five (45) days of receipt of this letter, a written detailed explanation, documenting compliance with each of the requirements listed in the inspection report, must be submitted to this office. Please direct any response to this letter and any questions to Mr. Scott Draschil at (317) 418-9299. Thank you for your attention to this matter.

Sincerely,

Susan Lowry
Section Chief
Hazardous Waste Compliance Section
Compliance and Response Branch

Enclosure

cc: Lake County Health Department
IDEM NWRO



**ELECTRONIC-WASTE INSPECTION REPORT
FOR REGISTERED PROCESSING / STORAGE**
As required by 329 IAC 16 (effective on 9-14-07)
State Form

**INDIANA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT**

Hazardous Waste Compliance Section
Office of Land Quality
100 North Senate Avenue
MC 66-20 / IGCN 1101
Indianapolis, Indiana 46204-2251

1	Facility Name: Former location of Devine Owens Electronics Recycling, LLC		
E-waste Registration #: Not Registered	Registration Expiration Date: NA	Database Tracking #: INX000060053	
Location: 922 East Chicago Avenue		Inspection Date: 7/8/2015	
City: East Chicago	County: Lake	Zip Code: 46312	
Inspector: Scott Draschil	Other IDEM Reps.: None		
Primary contact during inspection: Kamal Hans		E-mail: kamal@zardaking.com	
Type of Inspection: CEI <input type="checkbox"/> Complaint <input type="checkbox"/> CAV <input type="checkbox"/> Limited <input type="checkbox"/> EFI <input checked="" type="checkbox"/> Other <input type="checkbox"/>			
Previous Inspections: 2/24/2015			
Unresolved Past Violations (explain): IC 13-30-2-1(4)			
Max. Allowable E-waste Wt.: 23 Tons		E-waste Wt. On-site: ~ 3 tons	
Inspection Result: Additional Information Required (See Section 8)			

2	Inspection Narrative – Include; general facility description, detailed description of e-waste and e-waste generating processes, inspection itinerary, relevant differences from previous inspections, description of contaminant releases, guidance documents provided, and other relevant comments.
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This was a follow-up inspection to a previous complaint inspection conducted on February 24, 2015. During that inspection it was noted the facility was storing over 200 TV's and other miscellaneous electronics and casing outside behind the building. In accordance with IC 13-30-2-1(4), the facility owner was asked to not store electronics outside and to ship them off-site to a reputable recycler.

Upon arrival, I met with Mr. Kamal Hans. Mr. Hans is the Chief Operating Officer for Zarda King Ltd. which is the current occupant/owner of the building. Zarda King is an importer and distributor of goods from South Asia and does not generate e-waste. This building was previously occupied by Devine Owens Electronics Recycling prior to it being purchased by Mr. Hans' father in September of 2014. When Devine Owens vacated the building they left behind a large amount of e-waste which Mr. Hans is currently in the process of cleaning up. During the inspection it was observed that approximately 75% of the e-waste noted during the initial inspection had been sent off for recycling. Mr. Hans is utilizing Intercon Solutions to recycle the e-waste. Intercon Solutions is an R2 certified electronics recycler in Chicago Heights Illinois. Mr. Hans estimated he would have all the e-waste shipped off by the end of August of this year. At that time he will submit documentation to this Office verifying that all the e-waste has been properly recycled.

3	Activities: Collecting <input type="checkbox"/> Brokering <input type="checkbox"/> Storing <input checked="" type="checkbox"/> Dismantling <input type="checkbox"/> Shredding <input type="checkbox"/>
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4	Documents Reviewed: Registration <input type="checkbox"/> Re-use/Recycle Plan <input type="checkbox"/> Weight Incoming/Outgoing <input type="checkbox"/> Shipping Papers <input type="checkbox"/> Training Log <input type="checkbox"/> Other (Describe) <input type="checkbox"/>
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5	E-waste Stream General Information (off-site shipment rate from processing and/or storing e-waste)		
	Description	Off-site Shipment Rate	Disposition
	Misc. E-waste		Intercon Solutions - Chicago Heights IL

6	<p>Pollution Prevention (P2)</p> <p>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 or CMTI. Please visit the agency's P2 web site at www.in.gov/idem/oppta for additional information.</p>
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None

7	<p>Violations: Any violations are indicated with a checkmark and are described in detail in Section 16 and include location information, corrective measures, and compliance dates if applicable.</p>
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Acts Prohibited, Thermal or Chemical Treatment, & Registration		Regulatory Citation	Code
<input type="checkbox"/>	1 Acts Prohibited (threats to human health or the environment)	329 IAC 16-1-4	
<input type="checkbox"/>	2 Thermal or Chemical Treatment (obtain solid waste permit)	329 IAC 16-4-1(a)	
<input type="checkbox"/>	3 Thermal or Chemical Treatment (financial assurance under e-waste rule)	329 IAC 16-4-1(b)	
<input type="checkbox"/>	4 Registration Content Requirements & Expiration (5 years max.)	329 IAC 16-5-1	
<input type="checkbox"/>	5 Registration (operating without first submitting a registration)	329 IAC 16-5-2	
Storage Requirements			
<input type="checkbox"/>	6 Stored in weather tight building, closed container, or covered vehicle	329 IAC 16-6-1(a)	
<input type="checkbox"/>	7 Container label describing contents and date received (incoming containers)	329 IAC 16-6-1(b)	
<input type="checkbox"/>	8 Plan to reuse or recycle & if applicable, reason why storing over 1 year	329 IAC 16-6-1(c)(1)	
<input type="checkbox"/>	9 Records: amounts received, shipped for recycling, shipped for disposal	329 IAC 16-6-1(c)(2)	
<input type="checkbox"/>	10 Amounts must be recorded by weight only and by day, week, or month	329 IAC 16-6-1(c)(3)	
<input type="checkbox"/>	11 Shipping papers and manifests must be retained for 3 years	329 IAC 16-6-1(c)(4)	
<input type="checkbox"/>	12 Adequate fire-extinguishing equipment and submit contingency plan to fire dept.	329 IAC 16-6-1(d)	
<input type="checkbox"/>	13 Access controls in place and secure during non-business hours	329 IAC 16-6-1(e)	
<input type="checkbox"/>	14 Maintain land, building, vehicles, and containers free of other solid waste	329 IAC 16-6-1(f)	
<input type="checkbox"/>	15 Avoid threat to human health & the environment when storing solid waste (avoid storing electronic debris for more than 6 months)	329 IAC 16-6-1(g)	
Operational Requirements			
<input type="checkbox"/>	16 Sign for building (visible by door, at least 1' x 2', with at least 1" lettering)	329 IAC 16-7-1(a)(1)	
<input type="checkbox"/>	17 Building must have roof, impervious floor, and be completely enclosed	329 IAC 16-7-1(a)(2)	
<input type="checkbox"/>	18 Communication devices available when employees present and building in use	329 IAC 16-7-1(a)(4)	
<input type="checkbox"/>	19 Container & vehicle label describing contents and dated within 3 days after filled	329 IAC 16-7-1(b)	
<input type="checkbox"/>	20 Record Retention (registration, contingency plan, speculative accumulation, training log, & waste determination results)	329 IAC 16-7-1(c)	
<input type="checkbox"/>	21 Record Availability: required records and analytical must be available & furnished	329 IAC 16-7-1(d)	
<input type="checkbox"/>	22 No hazardous waste processing unless permitted for hazardous waste processing	329 IAC 16-7-1(e)	
Training Employees			
<input type="checkbox"/>	23 Training Annually (proper handling, safety, emergency procedures)	329 IAC 16-8-1(a)	
<input type="checkbox"/>	24 Training Log (copy of provided training, employee names & dates trained)	329 IAC 16-8-1(b)	
Miscellaneous			
<input type="checkbox"/>	25 E-waste & E-debris Determination (required for disposal in & out of state)	329 IAC 16-9-1	
<input type="checkbox"/>	26 Closure (notify prior to closure, dispose of waste properly, closure certification)	329 IAC 16-10-1	
<input type="checkbox"/>	27 Financial Assurance (surety bond, \$200 per ton, including electronic devices)	329 IAC 16-11-1	
<input type="checkbox"/>	28 Exporting broken CRTs for recycling requires approval from EPA & Country	40 CFR 261.39	
<input type="checkbox"/>	29 Exporting intact CRTs for recycling requires approval from EPA & Country	40 CFR 261.40	

<input type="checkbox"/>	30	Exporting intact CRTs for reuse requires a one time notification to EPA	40 CFR 261.41	
<input type="checkbox"/>	31	Hazardous Waste Determination (for waste not covered under 329 IAC 16-9-1)	40 CFR 262.11	
<input checked="" type="checkbox"/>	32	Other: Acts Prohibited (IC 13-30-2-1(4))		B
Codes: A=refer to enforcement, B=needs follow-up evaluation or submittal, C= resolved on site, D=severity unknown				

8	Violation descriptions: Includes observed violations with corresponding regulatory citations, corrective measures, and compliance dates if applicable.
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CITATION:

IC 13-30-2-1(4) (Specific acts prohibited): A person may not deposit or cause or allow the deposit of any contaminants or solid waste upon the land, except through the use of sanitary landfills, incineration, composting, garbage grinding, or another method acceptable to the solid waste management board.

DETAILS:

Facility still had e-waste stored at the facility however the owner is actively working to clean up the property and has made significant progress since the initial inspection in February of 2015.

REQUIRED ACTION

Property owner has stated he will provide information to this Office (within the next couple months) documenting that all the e-waste has been shipped off-site for recycling. This case will remain pending until that time.

9	Attachments: Map <input type="checkbox"/> Manifest <input type="checkbox"/> Notice of Inspection Form <input checked="" type="checkbox"/> Pictures <input checked="" type="checkbox"/> Photographer: Scott Draschil Other <input type="checkbox"/> :
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#1
Remaining e-waste behind the building. Property owner was actively cleaning up the site at the time of inspection.



NOTICE OF INSPECTION
State Form 50890 (R3 / 11-05)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Telephone: (800) 451-6027 or (317) 232-8603

This is to notify you that on 7/8/15 an inspection of 922 EAST CHICAGO AVE 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):

- Follow-up

 Complaint
 Multi-Media Screening Evaluation
 Other

Preliminary Inspection/Screening 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.

Single Media Inspection:

- 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)

Multi-Media Screening (Please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

- Multi-media screening not conducted.
 No violations were discovered with respect to the limited multi-media screening conducted by IDEM.
 Potential violations were discovered but corrected during the inspection.
 Potential violations were discovered and may be further investigated.

Pollution Prevention:

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that Indiana businesses increase productivity, generate less environmental wastes, reduce their regulatory responsibilities and become more profitable. Your participation in Indiana's pollution prevention program is entirely voluntary. If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance (OPPTA) at (317) 232-8172 or (800) 988-7901, or visit OPPTA's Web site at www.idem.IN.gov/oppta/p2/. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? Yes No

Compliance Assistance:

In addition to the compliance assistance offered by IDEM's individual programs, IDEM's Compliance and Technical Assistance Program (CTAP) offers free, confidential compliance assistance to regulated entities, including small businesses and municipalities, throughout Indiana. In the future, if you would like to request free, confidential compliance assistance, call (317) 232-8172 or (800) 988-7901, or visit CTAP's Web site at www.idem.IN.gov/ctap.

A summary of violations and concerns noted during the inspection was verbally communicated to the undersigned representative during the inspection. The facility should correct any violations noted as soon as possible. Violations identified and corrected during the inspection may still be cited as violations.

A written inspection summary will be provided within 45 days. In accordance with IC 13-14-5-4, matters not evident to IDEM at the time of the inspection might not be included in either the verbal or written inspection summary.

IDEM Representative:

Printed Name	Signature	Phone Number	Date	Time
SCOTT DRASCHEL	<i>[Signature]</i>	317-418-9299	7/8	In: 10:40 Out: 11:20

Owner/Agent Representative:

Printed Name	Signature	Title	Phone Number	Date
KAMAL HAUS	<i>[Signature]</i>	SOO	317-698-8889	7/8/15

EMANUEL, DONNA

From: Kamal Hans <kamal@zardaking.com>
Sent: Friday, July 24, 2015 12:49 PM
To: EMANUEL, DONNA
Cc: County, Lake-Gary; DRASCHIL, SCOTT; Bhim Hans
Subject: RE: Zarda King Ltd.

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

Hi Donna,

As Scott mentioned in his report, we are actively engaged in cleaning up 922 E Chicago Ave. Thank you for your oversight.

Regards,

Kamal Hans

From: EMANUEL, DONNA [<mailto:DEMANUEL@idem.IN.gov>]
Sent: Friday, July 24, 2015 6:37 AM
To: 'kamal@zardaking.com'
Cc: County, Lake-Gary; DRASCHIL, SCOTT
Subject: Zarda King Ltd.

Dear Mr. Hans,

Attached is the Enforcement Follow-Up Inspection report that Mr. Scott Draschil prepared for **Zarda King LTD**, on July 8, 2015 which is located at 922 East Chicago Avenue, East Chicago, Lake 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
IDEM/Office of Land Quality - Compliance Branch
Mail Code: 66-20 (1368)
100 North Senate Avenue
Indianapolis, Indiana 46204
demanuel@idem.in.gov
(317) 234-6923
(317) 234-0428 - Fax*