

**From:** [Alexander, Riley](#)  
**To:** [IDEM OAQ Annual Compliance Certifications](#)  
**Cc:** [Sharp, Steve](#); [Welte, Nick](#); [Timothy J. Tanner \(tjtanner@redspot.com\)](#); [Kolb, Kevin J.](#)  
**Subject:** RY2023 ACC Red Spot Paint & Varnish Co, Inc.  
**Date:** Wednesday, April 10, 2024 6:22:15 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[RY2023 ACC Red Spot Paint Varnish Co Inc.pdf](#)

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Dear Sir/Madam:

Arcadis U.S., Inc., on behalf of Red Spot Paint & Varnish Co, Inc. (Red Spot) is submitting the attached Report Year 2023 Annual Compliance Certification (ACC) for the Red Spot facility located in Evansville, Indiana, as required by 326 IAC 2-7-6(5). The Red Spot facility currently operates under Title V Operating Permit No. T163-45716-00018.

Sincerely,

**Riley M. Alexander**

EHS Regulatory Compliance Specialist

Arcadis U.S., Inc.

55 West Monument Circle, Ste 300B | Indianapolis IN | 46204 | USA

T. +1 317-371-7465

[www.arcadis.com](http://www.arcadis.com)



Be green, leave it on the screen.

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April 10, 2024

Indiana Department of Environmental Management  
Office of Air Quality  
Compliance Branch  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, IN 46204-2251



Arcadis U.S., Inc.  
55 Monument Circle  
Suite 300B  
Indianapolis  
Indiana 46204  
Phone: 317 231 6500  
[www.arcadis.com](http://www.arcadis.com)

**Re: RY2023 Annual Compliance Certification  
Red Spot Paint & Varnish Co, Inc.  
Evansville, Indiana  
Permit No. T163-45716-00018**

Dear Sir/Madam:

Arcadis U.S., Inc. (Arcadis), on behalf of Red Spot Paint & Varnish Co, Inc. (Red Spot), is submitting the Report Year 2023 Annual Compliance Certification (ACC) for the Red Spot facility located in Evansville, Indiana, as required by 326 IAC 2-7-6(5). Red Spot operates under Title V Operating Permit No. T163-45716-00018. The ACC is included as Attachment A.

If you have any questions or require additional information about this submission, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads 'Riley M. Alexander'.

Riley M. Alexander  
EHS Regulatory Compliance Specialist  
Email: [riley.alexander@arcadis.com](mailto:riley.alexander@arcadis.com)  
Direct Line: 317 371 7465

A handwritten signature in blue ink that reads 'Steven C. Sharp'.

Steven C. Sharp, LPG (IN)  
Principal Geologist  
Email: [steve.sharp@arcadis.com](mailto:steve.sharp@arcadis.com)  
Direct Line: 317 236 2829

Attachment A – Annual Compliance Certification

cc: Timothy Tanner, Red Spot Paint & Varnish Co. Inc.  
Nick Welte, Arcadis U.S., Inc.

# Attachment A

## Annual Compliance Certification



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, IN 46204-2251

**PART 70 / FESOP PERMIT-ANNUAL COMPLIANCE CERTIFICATION**

This form can be used to satisfy the annual compliance certification requirements for Part 70 sources under 326 IAC 2-7-5, 326 IAC 2-7-6(5)(C) and FESOP sources under 326 IAC 2-8-5(a)(1)(C).

SOURCE INFORMATION			
(1) Source name:	Red Spot Paint & Varnish Co., Inc.		
(2) Source address:	1016 East Columbia Street		
(3) City:	Evansville	(4) State:	IN (5) Zip code: 47711
(6) Mailing address:	PO Box 418		
(7) Mailing City:	Evansville	(8) Mailing State:	IN (9) Mailing Zip code: 47703
(10) Permit numbers:	163 43449 00018 w/ significant modification 45	(11) Reporting Period:	01/01/2023 42/31/2023
(12) Contact person:	Timothy Tanner	(13) Email Address:	tjtanner@redspot.com
(13) Phone number:	812.428.9239	(15) Fax number:	812.435.1777
(14) Comments:			

SOURCE COMPLIANCE INFORMATION	
(17) CHECK THE BOX NEXT TO EITHER (A) OR (B) BELOW. (The terms "continuous compliance" and "intermittent compliance" are defined on the Definitions page).	
(A) This source was in <b>CONTINUOUS COMPLIANCE</b> with all of the permit terms and conditions that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in the permit.	<input type="checkbox"/>
(B) This source was in <b>CONTINUOUS COMPLIANCE</b> with all of the permit terms and conditions that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in the permit, <b>except</b> for the terms and conditions listed in the following table for which the source reported intermittent compliance.	<input checked="" type="checkbox"/>

**IMPORTANT:** If you select option (B), you must complete the following table in which you list any permit terms for which compliance was intermittent during the permit for the reporting period covered by this Compliance Certification.

**(18) PERMIT TERMS FOR WHICH COMPLIANCE WAS INTERMITTENT – Attach additional sheets if necessary**

Source Name: Red Spot Paint & Varnish Co, Inc.			Source Permit Number: 163-45716-00018
Permit Term/Condition	Description of Permit Condition	*Method Codes	Report Date/Comments
C.17 (a)	Quarterly Deviation and Compliance Report	RK	On November 30, 2023, IDEM conducted an inspection and noted that at the time of the visit the Q3 2023 Quarterly Deviation and Compliance Report and the Q3 2023 Quarterly HAP Emissions Summary Report had not been submitted to the IDEM & EPA by the October 30, 2023 deadline. Per the December 6, inspection summary, Red Spot failed to track the facility's monthly toluene emissions (Condition D, 5(3)). Red Spot tracks HAP emissions electronically. Due to recent employee turnover, at the time of the inspection, Timothy Tanner did not have access to the emissions system to demonstrate compliance. Red Spot received a warning for the violations. The signed reports indicating the permit conditions were submitted electronically to both agencies on December 5, 2023.
D.1.6	Quarterly HAP Emissions Summary Report	RK	

**\*Method Codes:**


Monitoring methods: CEMS = continuous emissions monitoring system; COMS = continuous opacity monitoring system; ST = stack test;

VE = visible emissions; RK = record keeping; RR = review of records; MB = mass balance; EF = emissions factor; Insp = inspections; FA = fuel analysis; WP = work practice; PM = parametric monitoring;

Calc = calculations; O = other (specify in Comments)

**For Part 70 sources:** The submittal by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**For FESOP sources:** The notification which shall be submitted by the Permittee requires the certification by the "authorized individual" as defined by 326 IAC 21.1-1 (1).

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.			
Signature:		Title/Position:	VP Legal Affairs Strategic Planning, & Operations
Printed Name:	Timothy Tanner	Date:	April 4, 2024
Phone number:	812.428.9239	Email:	tjtanner@redspot.com

**PLEASE NOTE: YOU MUST EITHER SIGN THIS FORM OR ATTACH THE CERTIFICATION FORM INCLUDED IN YOUR PERMIT.**

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, IN 46204-2251

**PART 70 / FESOP PERMIT- ANNUAL COMPLIANCE CERTIFICATION**

This form can be used to satisfy the annual compliance certification requirements for Part 70 sources under 326 IAC 2-7-5, 326 IAC 2-7-6(5)(C) and FESOP sources under 326 IAC 2-8-5(a)(1)(C).

SOURCE INFORMATION			
(1) Source name:	Red Spot Paint & Varnish Co, Inc.		
(2) Source address:	1016 East Columbia Street		
(3) City:	Evansville	(4) State:	IN (5) Zip code: 47711
(6) Mailing address:	PO Box 418		
(7) Mailing City:	Evansville	(8) Mailing State:	IN (9) Mailing Zip code: 47703
(10) Permit numbers:	163-43449-00018 w/ significant modification 45716	(11) Reporting Period:	01/01/2023-12/31/2023
(12) Contact person:	Timothy Tanner	(13) Email Address:	tj_tanner@redspot.com
(13) Phone number:	81242 89239	(15) Fax number:	812435.1777
(14) Comments:			

SOURCE COMPLIANCE INFORMATION	
(17) CHECK THE BOX NEXT TO EITHER (A) OR (B) BELOW. (The terms "continuous compliance" and "intermittent compliance" are defined on the Definitions page).	
(A) This source was in <b>CONTINUOUS COMPLIANCE</b> with all of the permit terms and conditions that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in the permit.	<input type="checkbox"/>
(B) This source was in <b>CONTINUOUS COMPLIANCE</b> with all of the permit terms and conditions that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in the permit <b>except</b> for the terms and conditions listed in the following table for which the source reported intermittent compliance.	<input checked="" type="checkbox"/>
<b>IMPORTANT:</b> If you select option (B), you must complete the following table in which you list any permit terms for which compliance was intermittent during the permit for the reporting period covered by this Compliance Certification.	

## Title V / FESOP Annual Compliance Certification Review Sheet

To: IDEM Virtual File Cabinet	Through: Supervisor	NC	ACES ID:	295987
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### Source Information

Source Name:	Red Spot Paint & Varnish Co	Plant ID:	163-00018
Permit Number(s):	45716, 43449	County:	Vanderburgh
Certification Year:	2023	Date ACC postmarked:	4/10/24
Reviewer:	Haug, Tammy	Date compliance review started:	6/20/24

### Compliance Review

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Was the ACC submitted late?	
		If submitted late, what action will be taken?	
		<input type="checkbox"/> Violation Letter	
		<input type="checkbox"/> Enforcement Action Letter	
		<input type="checkbox"/> Other:	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did the source identify any deviations in the ACC?	
		If yes, has OAQ already addressed the identified deviations? If so, what actions were taken, including the date the action was taken (e.g., VL; EAL, other)?	
		<b>VL issued on 12/6/23</b>	
		If no action was previously taken by OAQ, what action will be taken to follow-up (e.g., VL; EAL, other)?	
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you identify any violations not reported in the ACC?	
		If yes, describe the violation(s):	
		What action has been/will be taken to address the violation(s) (e.g., VL; EAL, other)?	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Was a revised ACC required to be submitted?	
		Date(s) the source submitted the revised ACC:	<b>Add permit number</b>
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did the source identify any emergencies in the ACC?	
		If yes, does the reported emergency qualify as an emergency under 326 IAC 2-7-1(12)?	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		If the reported emergency does not qualify as an emergency under 326 IAC 2-7-1(12), or relevant federal regulation, what action has been/will be taken?	
<b>6/20/24</b>		Date compliance review completed	
		Additional comments:	