



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Northwest Regional Office • 330 W. US Highway 30, Suite F • Valparaiso, IN 46385

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

August 6, 2024

VIA ELECTRONIC MAIL

Bob Sigel
C.D.E. Collision Centers
6100 U.S. 6
Portage, IN 46368
bsigel@cdecollisioncenters.com

Re: Inspection Summary Letter
C.D.E. Collision Centers
Portage, Porter County

Dear Bob Sigel:

On August 1, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of C.D.E. Collision Centers, located at 6100 U.S. 6 in Portage, 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:

Inspection Type: Autobody Refinishing
Inspection Results: No violations were observed

Please direct any questions to me at (219) 252-5989 or by email at thobson@idem.in.gov.

Sincerely,

Thalia Hobson, Compliance Inspector
Northwest Regional Office

ACES ID: 300158

cc: Thalia Hobson, Northwest Regional Office

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AUTO BODY INSPECTION REPORT**



| SOURCE INFORMATION | |
|--------------------|---|
| SOURCE NAME | C.D.E. Collision Centers |
| SOURCE LOCATION | 6100 U.S. 6, Portage, Indiana Porter County |
| MAILING ADDRESS | 6100 U.S. 6, Portage, IN 46368 |
| ATTAINMENT STATUS | <input type="checkbox"/> Attainment for all criteria pollutants <input checked="" type="checkbox"/> Nonattainment for <input type="checkbox"/> SO ₂ <input type="checkbox"/> CO <input checked="" type="checkbox"/> O ₃ <input type="checkbox"/> NO ₂ <input type="checkbox"/> Pb <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} |
| SOURCE DESCRIPTION | <p>326 IAC 8-10 applies to this source because:</p> <p><input checked="" type="checkbox"/> It refinishes motor vehicles, motor vehicle parts, motor vehicle components, or mobile equipment <u>AND</u> it refinishes more than 3 motor vehicles per calendar year.</p> <p>326 IAC 8-10 does not apply to this source because:</p> <p><input type="checkbox"/> It does not refinish motor vehicles, motor vehicle parts, motor vehicle components, or mobile equipment <u>OR</u> it refinishes 3 or fewer motor vehicles per calendar year.</p> <p>The source conducts the following exempt activities:</p> <p><input type="checkbox"/> Application of aerosol coating products</p> <p><input type="checkbox"/> Graphic design application</p> <p><input type="checkbox"/> Touch-up coating application</p> |

| INSPECTION INFORMATION | | | |
|--------------------------|---|-----------------------------|------------------------|
| INSPECTED BY | Thalia Hobson | | |
| INSPECTION DATE AND TIME | August 1, 2024 | TIME IN: 10:35 a.m. | TIME OUT: 11:35 a.m. |
| REPORTED BY | Thalia Hobson | REPORT DATE: August 2, 2024 | |
| INSPECTION NOTIFICATION | <input checked="" type="checkbox"/> Unannounced <input type="checkbox"/> Announced: | | |
| INSPECTION OBJECTIVE(S) | <input checked="" type="checkbox"/> Commitment <input type="checkbox"/> Complaint <input type="checkbox"/> Other: | | |
| ACES TRACKING NUMBER(S) | Inspection: 300158 | Complaint: N/A | Violation/Warning: N/A |
| RM TRACKING NUMBER(S) | Complaint: N/A | | |
| INSPECTION BACKGROUND | Inspection was conducted to determine the source's applicability to and compliance with 326 IAC 8-10. The dealership located on the same property was last inspected on October 22, 2008. Violations were observed. | | |

| SOURCE PERSONNEL INTERVIEWED | | | |
|------------------------------|------------------|---------------------|--|
| <i>Name</i> | <i>Title</i> | <i>Phone Number</i> | <i>Email Address</i> |
| Bob Sigel | Location Manager | (219) 787-8700 | bsigel@cdecollisioncenters.com |

| INSPECTION, COMPLAINT, AND COMPLIANCE HISTORY (PREVIOUS 5 YEARS) |
|--|
| None. |

| COMPLIANCE REQUIREMENTS | | |
|--|-------------------|--|
| <i>Requirement</i> | <i>Citation</i> | <i>Violation(s) Noted</i> |
| VOC EMISSION LIMITS AND STANDARDS | | |
| VOC content (as applied) of coatings or surface preparation products shall not exceed limits in 326 IAC 8-10-4(a). | 326 IAC 8-10-4(a) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A |

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| Application of specialty coatings (except anti-glare/safety coatings) shall not exceed 5% by volume of all coatings applied on a monthly basis. | 326 IAC 8-10-4(b) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A |
| WORK PRACTICE STANDARDS | | |
| Spray guns are cleaned in an enclosed device that: <ul style="list-style-type: none"> Is closed during spray gun equipment cleaning operations except when depositing and removing objects to be cleaned. Recirculates cleaning solvent during the cleaning operation. | 326 IAC 8-10-5(a) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A |
| Use only the equipment below for coating application: <ul style="list-style-type: none"> Electrostatic equipment High volume-low pressure (HVLP) spray equipment Pre-approved alternative [see 326 IAC 8-10-5(b)(3)] | 326 IAC 8-10-5(b) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A |
| HOUSEKEEPING | | |
| Store all paper, cloth, plastic, or other materials that have been contaminated with coatings or solvent in closed containers. | 326 IAC 8-10-5(c)(1) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A |
| Store all fresh or used refinishing materials including solvents, coatings, VOC-containing additives, materials, or waste materials in closed containers. | 326 IAC 8-10-5(c)(2) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A |
| Storage containers and equipment shall be free from cracks, holes, and leaks. | 326 IAC 8-10-5(c)(3) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A |
| Store waste coatings and used automotive fluids in closed containers. | 326 IAC 8-10-5(c)(4) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A |
| All coatings applied and cleaning shall be performed in a manner that minimizes overspray. | 326 IAC 8-10-5(c)(5,6,7) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A |
| TRAINING | | |
| Develop a written training program including written procedures and hands-on demonstration on the following: <ul style="list-style-type: none"> Identification of appropriate coatings or surface preparation products. Preparation of coatings or surface preparation products. Application of coatings or surface preparation products. Operation and maintenance of spray gun cleaning equipment. Work practice standards. Procedures to gather, record, monitor, and report data. | 326 IAC 8-10-5(d)(1) | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A |
| Provide annual refresher training prior to May 1 of each year appropriate to the job responsibilities of the employee | 326 IAC 8-10-5(d)(2) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A |
| Any person may perform 1 or more activities in (d)(1) for not more than 180 days provided: <ul style="list-style-type: none"> Untrained person works under supervision of person who meets training requirements Maintain the following records: <ul style="list-style-type: none"> Date the person was assigned to the activity. Date training was completed. Name of person providing supervision. | 326 IAC 8-10-5(d)(3) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A |
| RECORDKEEPING AND REPORTING | | |
| Maintain records of the training program including: <ul style="list-style-type: none"> Date training was completed List of persons, by name and activity and topics trained on Statement signed by trainer certifying each trainee who satisfactorily completed training in the topics and is proficient in the procedures | 326 IAC 8-10-5(d)(4) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A |
| Submit a statement signed by responsible official certifying facility has acquired and will continuously employ coatings or surface preparation products meeting the VOC limits in 326 IAC 8-10-4(a). | 326 IAC 8-10-6(c) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A |

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| <p>For each batch of coating mixed or refinishing job performed, maintain records of the following:</p> <ul style="list-style-type: none"> • Batch or job identification number or name. • Date batch made or job performed. • Coating category, consistent with the coating categories in section 4(a) of this rule. • Coating manufacturer's name and identification number. • Quantity used in making the mix or the mix ratio used. • VOC content as supplied or packaged. • Manufacturer's name and identification number of added components. • Quantity of components added or mix ratio used. | 326 IAC 8-10-9(a)(1) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A |
| <p>For each surface preparation product used, maintain records of the following:</p> <ul style="list-style-type: none"> • Manufacturer's name and identification number. • Substrate to which the product is applied. • VOC content as supplied per calendar month for: <ul style="list-style-type: none"> ○ Number of containers used; and ○ Volume of each container and the ratio of components added. | 326 IAC 8-10-9(a)(2) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A |
| <p>Maintain MSDS, product or other data sheets for a period of 3 years following use of the product.</p> | 326 IAC 8-10-9(a)(3) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A |
| <p>Report within 30 days the following:</p> <ul style="list-style-type: none"> • Any incidence in which noncompliant coating was used. • Reasons for use of the noncompliant coating. • Corrective actions taken. | 326 IAC 8-10-9(e) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A |

OBSERVATIONS AND COMMENTS

C.D.E Collision Centers (CDE) operates an auto body shop inside of a car dealership. The dealership does not paint more than three (3) car-equivalents per year. The inspection was limited to the CDE shop. All paints used at the facility are water based. Solvent-based additives such as thinners, thickeners, or primers are sometimes mixed in at a ratio not greater than one part solvent per nine parts paint. At this ratio it is impossible for CDE to exceed the VOC as-applied limits established under state regulations. CDE retains records on the composition of each paint batch to prove that the 10% limit is adhered to. I checked the records and found them to be adequate for this purpose.

The paint shop itself consists of an explosion-proof mixing room and a paint booth. The paint booth has an induced draft from filters on the ceiling of the room to the floor. I did not observe overspray on the ground or around the filters. I did not enter the paint booth as it was in use during the inspection. I was able to observe the booth through a window. Used solvent is kept in closed containers. There is a closed container for disposal of materials contaminated by solvents.

There is one (1) painter on staff. He attended a refresher course in July 2024. His certificate was made available to me. An initial notification was sent to the Environmental Protection Agency. The paint booth uses a high volume-low pressure spray gun. Documentation on the spray gun and booth filters' efficiency was made available to me.

INSPECTION FINDINGS

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|--|---|
| <input checked="" type="checkbox"/> No violations were observed or determined at the time of the inspection. <input type="checkbox"/> The following violations were determined at the time of the inspection: | |
| RECOMMENDED ACTION | Issue inspection summary letter. |
| EXIT INTERVIEW | I explained my findings, recommendations, and conclusions with Mr. Sigel prior to exiting the facility. |