



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Northern Regional Office • 300 N. Dr. Martin Luther King Jr. Blvd, Suite 211 • South Bend, IN 46601-1295

(800) 753-5519 • (574) 245-4870 • Fax (574) 245-4877 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockness
Commissioner

September 17, 2024

VIA ELECTRONIC MAIL

Mr. Oscar Orta
Custom Superior Paint, LLC
1700 West Lusher Avenue
Elkhart, IN 46517
scpaintllc@gmail.com

Re: Inspection Summary Letter
Custom Superior Paint, LLC
Source ID 039-00979
Elkhart, Elkhart County

Dear Mr. Oscar Orta:

On September 12, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Custom Superior Paint, LLC, located at 1700 West Lusher Avenue in Elkhart, 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: Complaint
Inspection Results: No violations were observed

Please direct any questions to me at 574-229-4303 or by email at pkarkiew@idem.in.gov.

Sincerely,
Paul Karkiewicz
Paul Karkiewicz, Compliance Inspector
Northern Regional Office
Office of Air Quality

ACES ID: 301815

cc: Paul Karkiewicz, Compliance and Enforcement Branch, Office of Air Quality

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FIELD INSPECTION REPORT**



SOURCE INFORMATION	
SOURCE NAME	Custom Superior Paint, LLC
SOURCE LOCATION	1700 West Lusher Avenue, Elkhart, Indiana Elkhart County
MAILING ADDRESS	1700 West Lusher Avenue, Elkhart, IN 46517
PLANT ID	039-00979
<u>PERMIT INFORMATION</u>	Permit Type: FESOP Permit Number: 46350 Permit Expiration Date: 06/16/2028 VFC Document No.(hyperlink): 83489879
ATTAINMENT STATUS	<input checked="" type="checkbox"/> Attainment for all criteria pollutants <input type="checkbox"/> Nonattainment for <input type="checkbox"/> SO ₂ <input type="checkbox"/> CO <input 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 STATUS	<input type="checkbox"/> PSD Major (326 IAC 2-2) <input type="checkbox"/> Major Source of HAPs <input type="checkbox"/> Emission Offset (326 IAC 2-3) <input type="checkbox"/> Area Source of HAPs <input type="checkbox"/> Acid Rain (326 IAC 21)
<u>SOURCE DESCRIPTION</u>	The Permittee owns and operates a stationary custom recreational vehicle painting service.

INSPECTION INFORMATION			
INSPECTED BY	Paul Karkiewicz		
INSPECTION DATE AND TIME	September 12, 2024	TIME IN: 1:00 PM	TIME OUT: 1:30 PM
REPORTED BY <i>PSK</i>	Paul Karkiewicz	REPORT DATE: September 12, 2024	
<u>COMPLIANCE PERIOD REVIEWED</u>	August 1, 2024, to September 12, 2024		
<u>INSPECTION NOTIFICATION</u>	<input checked="" type="checkbox"/> Unannounced <input type="checkbox"/> Announced:		
INSPECTION OBJECTIVE(S)	<input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Surveillance <input type="checkbox"/> Other:		
ACES TRACKING NUMBER(S)	Inspection: 301815	Complaint: 301816	Violation/Warning:
RM TRACKING NUMBER(S)	Complaint: 114333		
<u>INSPECTION BACKGROUND</u>	<p>On September 11, 2024, the following anonymous complaint was made to the IDEM Complaint Clearinghouse (which was forwarded to the Northern Regional Office the following day):</p> <p>I used to work there, and the environment is horrible, we are painting full paint RVs and Fifth Wheels with no paint booth and poor circulation for fans. I don't know How we can paint with no paint Booth LEGALLY!! There don't even require respirators, and in the winter heat area with salamanders I am quitting and will Never Go back !!</p>		

SOURCE PERSONNEL INTERVIEWED			
Name	Title	Phone Number	Email Address
Oscar Orta	Owner	574-596-2065	scpaintllc@gmail.com

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	Inspection/Complaint Type	Result	Comments
May 14, 2024	Complaint	Violations Noted	EAL issued on June 5, 2024 (see below)
COMPLIANCE HISTORY (PREVIOUS 5 YEARS)			
Informal Enforcement Actions			
Date Issued	Action Taken	Describe Violation(s)	
N/A			
Formal Enforcement Actions			
Case Number	Enforcement Type	Civil Penalty	Describe Violation(s)
2024-30220-A	Formal Enforcement	Open	<p>During May 14, 2024, Complaint Inspection (EAL sent on June 5, 2024, the following violations were noted:</p> <ol style="list-style-type: none"> 1) CSP failed to use dry particulate filters to control emissions from the paint booths identified as PBA and PBB, on May 14, 2024, in violation of Permit No. 46530, Condition D.2.3, Particulate Emission Limitations for Manufacturing Processes. 2) CSP failed to prepare and maintain Preventive Maintenance Plans (PMP), in violation of Permit No. 46530, for Conditions D.1.2 and D.2.5, Preventive Maintenance Plan. 3) CSP failed to prepare or obtain VOC data sheets, which are necessary to determine compliance with the VOC limitations noted in Conditions D.2.1(FESOP Limit) and D.2.4 (VOC BACT Avoidance), between June 16, 2023, to present, in violation of Permit No. 46530, Condition D.2.6(a). 4) CSP failed to prepare or obtain Hazardous Air Pollutant (HAP) data sheets, which are necessary to determine compliance with the HAP minor limitation noted in Condition D.2.2, between June 16, 2023, to present, in violation of Permit No. 46530, Condition D.2.6(b) VOC and HAPs. 5) CSP failed to perform daily inspections to verify the placement, integrity and particle loading of the paint booth filters (PBA, PBB, and PBC), and conduct weekly overspray observations of the paint booth stacks (S1 through S6), between June 16, 2023, and May 14, 2024, in violation of Permit No. 46530, Condition D.2.7(a) Monitoring. 6) CSP failed to conduct monthly inspections of coating emissions from the paint booth stacks (S1 through S6), and nearby ground, between June 16, 2023, and May 14, 2024, in violation of Permit No. 46530, Condition D.2.7(b), Monitoring. 7) CSP failed to maintain records of the VOC and HAP content for each coating and solvent used less water, between June 16, 2023, and May

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
			<p>14, 2024, in violation of Permit No. 46530, Condition D.2.8(a)(1), Record Keeping Requirements.</p> <p>8) CSP failed to maintain records concerning the amount of coating material and solvent less water used on a monthly basis between June 16, 2023, and May 14, 2024, in violation of Permit No. 46530, Condition D.2.8(a)(2), Record Keeping Requirements.</p> <p>9) CSP failed to maintain monthly cleanup solvent usage records, between June 16, 2023, and May 14, 2024, in violation of Permit No. 46530, Condition D.2.8(a)(3), Record Keeping Requirements.</p> <p>10) CSP failed to maintain records of the daily, weekly, and monthly inspections required by Conditions D.2.3 and D.2.7, in violation of Condition D.2.8(b), of Permit No. 46530, Record Keeping Requirements.</p> <p>11) CSP failed to maintain records of total VOC, total single HAP, and combined HAP input, including coatings, dilution solvents, and cleaning solvents, for each month and each compliance period, between June 16, 2023, and May 14, 2024, in violation of Permit No. 46530, Condition D.2.8(a)(4), Record Keeping Requirements.</p> <p>12) CSP failed to ensure and certify that all new and existing personnel responsible for surface coating at the facility had been properly trained in the proper aspects of surface coatings as defined in §63.11180 in violation of §63.11173(e)(1), and Condition E.1.2(5), of Permit No. 46350.</p> <p>13) CSP failed to retain records demonstrating the dry filters used at the source achieve at least 98 percent capture of paint overspray, in violation of §63.11177(b) and Condition E.1.2(9), of Permit No. 46350.</p> <p>14) CSP failed to retain records showing the manufacture tested efficiency for the high volume, low pressure (HVLP) spray guns, in violation of §63.11177(c), and Condition E.1.2(9), of Permit No. 46350.</p> <p>15) CSP failed to submit the initial notification as required by §63.11175(a), in violation of §63.11175(a), and Condition E.1.2(7), of Permit No. 46350.</p> <p>16) CSP failed to submit Quarterly Deviation and Compliance Monitoring Reports, and quarterly summaries to document compliance with Conditions D.2.1 (FESOP)</p> <p>17) CSP failed to submit the Affidavit of</p>

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
			Construction, verifying that the emission units were constructed as described in the permit application, in violation of Condition B.3, of Permit No. 46350.
2024-29919-A	Formal Enforcement	Open	<p>An EAL was sent on January 22, 2024, for the following violations found during a permit application review:</p> <p>1) According to 326 IAC 2-5.1-3, a source with a potential to emit any criteria pollutant of 100 tons per year or greater shall obtain a Part 70 construction permit.</p> <p>It was determined during review of the Permit Application on February 28, 2023, that Custom Superior Paint, LLC., constructed three (3) surface coating booths, identified as PBA, PBB, and PBC on March 1, 2023. The construction of surface coating booths PBA, PBB, and PBC PTE VOC was greater than 100 tpy. As such, Custom Superior Paint, LLC., constructed a major source of air emissions prior to obtaining a Part 70 construction permit, from March 1, 2023 to June 15, 2023, in violation of 326 IAC 2-5.1-3.</p>

INSPECTION OBSERVATIONS AND COMMENTS
<p>On September 12, 2024, the IDEM, NRO – Air Compliance Section performed a Complaint Inspection of Custom Superior Paint, LLC located in Elkhart, Indiana. No visible emissions were observed from the source during the pre-inspection surveillance. The nature of the complaint was discussed with Oscar Orta, Owner. Mr. Orta provided the Compliance Monitoring inspection logs for review. He then led a tour of the Custom Superior Paint facility. Paint Booth C (PBC) is being used for storage and is not currently being used as a paint booth. Paint Booth A (PBA) was not in operation at the time of the inspection. Some gaps were observed in the filter placement. Mr. Orta said they were getting ready to change these filters which were loaded with paint residue. He said filters are changed every 3 days. Paint Booth B (PBB) was operating with dry filters installed.</p> <p>Mr. Orta was advised to make sure that filters were properly installed in all booths and to continue the permit required Compliance Monitoring.</p>

INSPECTION FINDINGS	
<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 to Mr. Orta prior to exiting the facility.

ATTACHMENTS
<ul style="list-style-type: none"> N/A