



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

December 30, 2024

VIA ELECTRONIC MAIL

Carrie Andecover
Draper, Inc.
411 South Pearl Street
Spiceland, IN 47385
carrie.andecover@draperinc.com

Re: Inspection Summary Letter
Draper, Inc.
Source ID 065-00029
Spiceland, Henry County

Dear Carrie Andecover:

On December 19, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Draper, Inc., located at 411 South Pearl Street in Spiceland, 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: Commitment
Inspection Results: No violations were observed

Please direct any questions to me at 317-233-0033 or by email at rhayes@IDEM.IN.gov.

Sincerely,

Rebecca Hayes, Compliance Inspector
Compliance Section 1
Office of Air Quality

ACES ID: 304722

ENCLOSURE

cc: Rebecca Hayes, Compliance and Enforcement Branch, Office of Air Quality

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



SOURCE INFORMATION	
SOURCE NAME	Draper, Inc.
SOURCE LOCATION	411 South Pearl Street, Spiceland, Indiana Henry County
MAILING ADDRESS	411 South Pearl Street, Spiceland, IN 47385
PLANT ID	065-00029
<u>PERMIT INFORMATION</u>	Permit Type: MSOP Permit Number: 43888 Permit Expiration Date: 12/6/2025 (issued 4/1/2021) VFC Document No.(hyperlink): 83136322
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>	stationary Window Coverings, Projection Screens and Gymnasium Equipment Manufacturing facility

INSPECTION INFORMATION			
INSPECTED BY	Rebecca Hayes		
INSPECTION DATE AND TIME	December 19, 2024	TIME IN: 2:30 pm	TIME OUT: 4 pm
REPORTED BY	Rebecca Hayes	REPORT DATE: 12/23/2024	
<u>COMPLIANCE PERIOD REVIEWED</u>	5/19/2015 to 12/19/2024		
<u>INSPECTION NOTIFICATION</u>	<input checked="" type="checkbox"/> Unannounced <input type="checkbox"/> Announced:		
INSPECTION OBJECTIVE(S)	<input type="checkbox"/> Compliance Monitoring Strategy (CMS) <input checked="" type="checkbox"/> Commitment <input type="checkbox"/> Mega-Site: <input type="checkbox"/> FCE <input type="checkbox"/> PCE <input type="checkbox"/> Complaint <input type="checkbox"/> Other: <input type="checkbox"/> Surveillance		
ACES TRACKING NUMBER(S)	Inspection: 304722	Complaint:	Violation/Warning:
RM TRACKING NUMBER(S)	Complaint:		
<u>INSPECTION BACKGROUND</u>	Full Compliance Inspection		

SOURCE PERSONNEL INTERVIEWED			
Name	Title	Phone Number	Email Address
Chris Field	Facilities and Maintenance Manager	765-987-7999	cfield@draperinc.com
Carrie Andecover	EHS Manager		carrie.andecover@draperinc.com

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
<i>Date</i>	<i>Inspection/Complaint Type</i>	<i>Result</i>	<i>Comments</i>
5/19/2015	Commitment	Violations Noted	Violation Letter issued 6/22/2015

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)			
Informal Enforcement Actions			
<i>Date Issued</i>	<i>Action Taken</i>	<i>Describe Violation(s)</i>	
3/15/2023	Violation Letter	Exceeded VOC usage on 5/24/2022 and 7/19/2022	
11/13/2019	Violation Letter	Failed to maintain daily records of VOC usage daily	
10/25/2019	Violation Letter	Late ACC submission	
6/22/2015	Violation Letter	Failed to conduct paint booth monitoring	
Formal Enforcement Actions			
<i>Case Number</i>	<i>Enforcement Type</i>	Civil Penalty	Describe Violation(s)
		\$	
Other Relevant Actions			
<i>Action Taken</i>	<i>Comments</i>		

PERMIT SECTION D.1		
Emission Units and Control Devices:		
<p>One (1) paint spray booth, identified as PANT-BTH-001, constructed in 2000, utilizing an air atomization spray application system, coating a maximum of 10 flexible projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S5.</p> <p>One (1) paint spray booth, identified as PANT-BTH-002, constructed in 2000, approved in 2020 for modification, utilizing HVLP spray application system, coating a maximum of 6 wood cases, or 60 projection screens per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as S6.</p>		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input checked="" type="checkbox"/> VOC <input checked="" type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> HAPS		
Applicable Rules:		
326 IAC 8-1-1 326 IAC 8-2-12 326 IAC 6-3-2		
Requirement	Applicable	Violation Noted
Emission Limitations and Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Preventive Maintenance Plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Determination Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Recordkeeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: VOC emissions daily, daily, weekly and monthly paint booth monitoring		
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Observations and Comments:		
<p>The facility is a manufacturer of window coverings and projection screens. Much of the operations are for assembly of the final product. They have a paint booth (PANT-BTH-001) used to surface coating the flexible projection screens. They no longer have the wood surface coating operations with paint booth (PANT-BTH-002). Some of the housings for screens were made of wood historically, but they no longer use any wood for that application.</p> <p>The facility was in operation during the inspection. I observed dry filters on the paint booth exhaust that were in place and being used appropriately. I spot checked the daily, weekly, and monthly paint booth monitoring logs and found them adequate.</p> <p>The facility is calculating the daily VOC emissions and reporting those in each quarter's compliance monitoring reports.</p>		
Permit Section Compliance Status:		
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:		

ADDITIONAL SOURCE COMPLIANCE REVIEW:	
The following reports are required and were reviewed:	
<input type="checkbox"/> Annual Compliance Certification(s)	<input type="checkbox"/> Deviation & Compliance Monitoring Report(s)
<input checked="" type="checkbox"/> Annual Notification(s)	<input type="checkbox"/> Emission Statement(s)
The reports are consistent with inspection observations.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
The permit accurately represents emission units observed on site.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Compliance assistance was provided during the inspection.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
The source is required to have a Risk Management Plan [40 CFR 68].	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, the source has a plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
If yes, the employees have been trained.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Additional Information and Comments:	
Additional Source Compliance Review Status:	
<input checked="" type="checkbox"/> No violations were observed or determined for this permit section at the time of the inspection. <input type="checkbox"/> The following violations were determined for this permit section at the time of the inspection:	

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 with source contacts prior to exiting the facility.