



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • Fax (317) 233-6647 • www.idem.in.gov

Mike Braun
Governor

Clint Woods
Commissioner

September 2, 2025

VIA CERTIFIED MAIL #9589 0710 5270 0682 2483 39

John B. Poindexter, Manager
Truck Accessories Group, LLC
600 Travis Street, Suite 400
Houston, TX 77002-2935

VIA ELECTRONIC MAIL:

Corporation Service Company,
Registered Agent
135 North Pennsylvania Street,
Suite 1610
Indianapolis, IN 46204
sop@cscglobal.com

Re: Notice of Violation and Proposed Agreed Order
for Violations Identified via Inspection
Truck Accessories Group, LLC
Plant ID No. 039-00097
Elkhart, Elkhart County
Case No. 2025-30969-A

Dear Mr. Poindexter:

On March 4, 2025, a representative of the Indiana Department of Environmental Management ("IDEM"), Office of Air Quality, conducted an inspection of Truck Accessories Group, LLC located at 58288, 58390, and 28858 Ventura Drive in Elkhart, Indiana. This inspection was conducted pursuant to IC 13-14-2-2, and a summary of the inspection, mailed on August 4, 2025, was provided pursuant to IC 13-14-5.

As a result of information obtained during this inspection, IDEM alleges that violations of environmental permit conditions occurred. Specifically, Truck Accessories Group, LLC failed to perform and maintain records of daily dry filter inspections across multiple units in Plant 1 on multiple occasions.

In accordance with IC 13-30-3-3, this letter includes a Notice of Violation that sets forth the alleged violations and an Agreed Order that provides Truck Accessories Group, LLC the opportunity to settle this enforcement action. IDEM encourages settlement by Agreed Order when possible to quickly correct environmental violations and avoid litigation.

The alleged violations identified in the Notice of Violation are among those that IDEM has determined qualify for expedited enforcement. This means the enclosed Agreed Order is non-negotiable, and it represents IDEM's best settlement offer in this matter. The civil penalty included in the Agreed Order is the penalty amount that IDEM

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Letterhead ID: 2025-01-12-001

will accept only for the settlement of the alleged violations identified therein under its expedited enforcement program.

If Truck Accessories Group, LLC agrees to settle this enforcement action in accordance with the enclosed Agreed Order, its responsible official should sign and return the entire original Agreed Order within sixty (60) days of receipt to IDEM at the following address:

Natalie Ruiz, Case Manager
Compliance and Enforcement Branch – Mail Code 61-53
Indiana Department of Environmental Management
Indiana Government Center North
100 North Senate Avenue, Room 13W
Indianapolis, IN 46204-2251
Nsruiz@idem.in.gov

The civil penalty should be sent to the address listed in the Agreed Order within fifteen (15) days of your receipt of a copy of the final adopted Agreed Order. The final adopted Agreed Order will be mailed to you after it is approved and signed by the Assistant Commissioner of IDEM's Office of Air Quality.

IDEM is not required to extend the offer of entry into the Agreed Order for more than sixty (60) days. Because Indiana law allows a source to enter into an Agreed Order without admitting that the violation occurred, the attached Agreed Order includes this non-admission language. (See line 3 of the first paragraph of the Agreed Order.) If the Agreed Order is not entered into, IDEM may proceed with additional enforcement action requiring compliance with the environmental permit conditions and may seek monetary penalties in accordance with IDEM's Civil Penalty Policy (ID No. Enforcement 99-0002-NPD), which likely will result in a greater penalty than the penalty amount offered in this Agreed Order.

Please contact Natalie Ruiz, Case Manager, of my staff at 317-752-7860 or nsruiz@idem.in.gov if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Janusz Johnson', with a long horizontal line extending to the right.

Janusz Johnson, Branch Chief
Compliance and Enforcement
Office of Air Quality

cc: Jose Barbosa, EHS Manager, jbarbosa@truckgroup.com
Kevin Parks, D&B Environmental Consultant, kparks@dbesi.com
Elkhart County Health Department
Natalie Ruiz, Compliance and Enforcement Branch, Office of Air Quality
Adrienne Balla, Compliance and Enforcement Branch, Office of Air Quality
Randy Hoffman, Compliance and Enforcement Branch, Office of Air Quality



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NOTICE OF VIOLATION

John B. Poindexter, Manager
Truck Accessories Group, LLC
600 Travis Street, Suite 400
Houston, TX 77002-2935

Corporation Service Company, Registered
Agent
135 North Pennsylvania Street,
Suite 1610
Indianapolis, IN 46204
sop@cscglobal.com

Case No. 2025-30969-A

Based on an inspection on March 4, 2025, the Indiana Department of Environmental Management ("IDEM") has reason to believe that Truck Accessories Group, LLC ("Respondent") has violated environmental permit conditions. The violations are based on the following:

1. Respondent owns and operates a stationary pickup truck covers (fiberglass reinforced caps and tonneaus, and aluminum caps) manufacturing and coating plant with Plant ID No. 039-00097 located at 58288, 58390, and 28858 Ventura Drive in Elkhart, Elkhart County, Indiana (the "Site").
2. Pursuant to Part 70 Operating Permit No. 039-44965-00097 ("Permit 44965"), Conditions D.1.9(a) and D.1.10(c)(2), Respondent shall perform and maintain records of daily dry filter inspections. Respondent shall include in its records when an inspection was not performed and the reason for lack of inspection (e.g. the process did not operate that day).

Respondent failed to perform and maintain records of daily dry filter inspections for Plant 1 Gel Coat Booth on March 28 to March 31, 2023 and for Plant 1 Chop Booth on March 31, 2023, in violation of Permit 44965, Conditions D.1.9(a) and D.1.10(c)(2).

3. Pursuant to Permit 44965, Conditions D.1.9(a) and D.1.10(c)(2), and corresponding conditions in subsequent permits, Respondent shall perform and maintain records of daily dry filter inspections. Respondent shall include in its records when an inspection was not performed and the reason for lack of inspection (e.g. the process did not operate that day).

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LD 00000001 03/01/2024

Respondent failed to perform and maintain records of daily filter inspections for the Plant 1 Prep Booth in March 2023, May 2023, and June through December 2023, in violation of Permit 44965, Conditions D.1.9(a) and D.1.10(c)(2), and corresponding conditions in subsequent permits.

Respondent failed to perform and maintain records of daily dry filter inspections for Plant 1 Cap Carpet Booth in April 2023, and June through September of 2023, in violation of Permit 44965, Conditions D.1.9(a) and D.1.10(c)(2), and corresponding conditions in subsequent permits.

Respondent failed to perform and maintain records of daily dry filter inspections for Plant 1 Tonneau Carpet Booth in March 2023, June through August 2023, and November through December 2023, in violation of Permit 44965, Conditions D.1.9(a) and D.1.10(c)(2), and corresponding conditions in subsequent permits.

4. Pursuant to Part 70 Operating Permit No. 039-46560-00097 ("Permit 46560"), Conditions D.1.9(a) and D.1.10(c)(2), and corresponding conditions in subsequent permits, Respondent shall perform and maintain records of daily dry filter inspections. Respondent shall include in its records when an inspection was not performed and the reason for lack of inspection (e.g. the process did not operate that day).

Respondent failed to perform and maintain records of daily dry filter inspections for Plant 1 Paint Booths, identified as P1PB1 and P1PB2, on January 31, 2024; March 28 to March 31, 2024; May 24, and May 29 to May 31, 2024, in violation of Permit 46560, Conditions D.1.9(a) and D.1.10(c)(2), and corresponding conditions in subsequent permits.

In accordance with IC 13-30-3-3, the Commissioner herein provides notice that a violation may exist and offers an opportunity to enter into an Agreed Order providing for the actions required to correct the violation and for the payment of a civil penalty for the violation. The Commissioner is not required to extend this offer for more than sixty (60) days. An Agreed Order for your consideration is attached. As noted on the attached Agreed Order, it is a qualified offer of settlement of this matter and, therefore, is inadmissible pursuant to Indiana's Rules of Evidence.

As provided in IC 13-30-3-3, an alleged violator may enter into an Agreed Order without admitting that the violation occurred. IDEM encourages settlement by Agreed Order to quickly correct environmental violations and to avoid litigation.

If the Agreed Order is not entered into within sixty (60) days of receipt of this Notice of Violation, the Commissioner may proceed with additional enforcement action requiring compliance with the environmental permit conditions and seek additional monetary penalties in accordance with IDEM's Civil Penalty Policy (ID No. Enforcement 99-0002-NPD). Pursuant to IC 13-30-4-1, the Commissioner may assess penalties of up to \$25,000 per day for each violation.

Please contact Natalie Ruiz, Case Manager, of my staff at 317-752-7860 or nsruiz@idem.in.gov if you have any questions.

For the Commissioner:



Date: 9-2-25

Janusz Johnson, Chief
Compliance and Enforcement Branch
Office of Air Quality

cc: Jose Barbosa, EHS Manager, jbarbosa@truckgroup.com
Kevin Parks, D&B Environmental Consultant, kparks@dbesi.com
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