



# 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. Rockensuess**  
Commissioner

June 18, 2024

VIA ELECTRONIC MAIL:

Ms. Lynn Peterson  
Patrick Industries dba CANA, Inc.  
29194 Phillips Street  
Elkhart, Indiana 46514  
lpeterson@cana-inc.com

Re: Inspection Summary/Enforcement Action  
Letter  
Patrick Industries dba CANA, Inc.  
Source ID 039-00005  
Elkhart, Elkhart County

Dear Ms. Lynn Peterson:

On June 6, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Patrick Industries dba CANA, Inc., located at 29194 Phillips Street 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: Commitment  
Inspection Results: Violations were observed and will result in an enforcement referral

At the time of the inspection, the following violations were noted:

- 1) According to Permit Nos. 44866, 46880 and 46921, Condition E.1.2(4), §63.803(c)(1) Work Practice Standards, Inspection and maintenance plan. Each owner or operator of an affected source shall prepare and maintain, with the work practice implementation plan, a written leak inspection and maintenance plan that specifies: A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents.

PICI failed to conduct monthly visual leak inspections for all equipment used to transfer or apply coatings and adhesives. Leak inspection records were not available for review. Leak inspections were not conducted from June 2022 to June 6, 2024, in violation of Permit No.44866, 46880 and 46921, Condition E.1.2(4), §63.803(c)(1) Work Practice Standards.

- 2) According to Permit Nos. 44866, 46880 and 46921, Condition E.1.2(7), §63.806(e)(2), the owner or operator of an affected source subject to the work practice standards in §63.803 (Work Practice Standards) of this subpart shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to records

collected in accordance with the inspection and maintenance plan required by §63.803(c).

PICI failed to document monthly visual leak inspections for all equipment used to transfer or apply coatings and adhesives. Leak inspection records were not available for review from June 2022 to June 6, 2024, in violation of Permit No.44866, 46880 and 46921, Condition E.1.2(7), §63.806(e)(2) Record Keeping Requirements.

Within thirty (30) days of the date of this letter submit the revised 40 CFR 63, Subpart JJ Semiannual Reports for the following periods: first and second half 2022, first and second half 2023 stating noncompliance with the Leak Inspection Work Practice Standard. The required submittal should be mailed or emailed to:

Adrienne Balla, Compliance Inspector  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
300 N Dr. Martin Luther King, Jr. Blvd., Ste. 211  
South Bend, Indiana 46601  
aballa@idem.IN.gov

These violations are among those that IDEM has determined qualify for expedited enforcement. This means you will separately receive an expedited Notice of Violation (NOV) and a non-negotiable Agreed Order (AO) from an enforcement case manager. These documents will represent IDEM's best settlement offer in this matter to resolve the violation. The civil penalty included in the AO will be the penalty amount that IDEM will accept only for the settlement of the identified violations under its expedited enforcement program.

Please direct any questions to Adrienne Balla, Compliance Inspector, at 574-229-4701 or by email at aballa@idem.IN.gov.

Sincerely,



for

James E. Weingart, Director  
Northern Regional Office  
Office of Air Quality

ACES ID: 298090

ENCLOSURE

cc: Adrienne Balla, Compliance and Enforcement Branch, Office of Air Quality  
Elkhart County Health Department  
Mr. David McIver, Jennifer Bailey, Compliance and Enforcement Branch, Office of Air Quality

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



SOURCE INFORMATION	
SOURCE NAME	Patrick Industries dba CANA, Inc.
SOURCE LOCATION	29194 Phillips Street, Elkhart, Indiana Elkhart County
MAILING ADDRESS	29194 Phillips Street, Elkhart, Indiana 46514
PLANT ID	039-00005
<u>PERMIT INFORMATION</u>	Permit Type: TVOP Permit Number: 46921 Permit Expiration Date: 03/18/2027 VFC Document No.(hyperlink): <a href="#">83576315</a>
ATTAINMENT STATUS	<input checked="" type="checkbox"/> Attainment for all criteria pollutants <input type="checkbox"/> Nonattainment for <input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> CO <input type="checkbox"/> O <sub>3</sub> <input type="checkbox"/> NO <sub>2</sub> <input type="checkbox"/> Pb <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub>
SOURCE STATUS	<input type="checkbox"/> PSD Major (326 IAC 2-2) <input checked="" 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 wood cabinet making and surface coating operation.

INSPECTION INFORMATION			
INSPECTED BY	Adrienne Balla <i>AAB</i>		
INSPECTION DATE AND TIME	June 6, 2024	TIME IN: 8:30AM	TIME OUT: 11:50AM
REPORTED BY	Adrienne Balla <i>AAB</i>	REPORT DATE: 06/12/2024	
<u>COMPLIANCE PERIOD REVIEWED</u>	May 12, 2022 to Present		
<u>INSPECTION NOTIFICATION</u>	<input checked="" type="checkbox"/> Unannounced <input type="checkbox"/> Announced:		
INSPECTION OBJECTIVE(S)	<input checked="" type="checkbox"/> Compliance Monitoring Strategy (CMS) <input 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: 298090	Complaint:	Violation/Warning: 298091
RM TRACKING NUMBER(S)	Complaint:		
<u>INSPECTION BACKGROUND</u>	Purpose of Inspection: To determine compliance with the company's permit and any additional state or federal air rules.  Hours of Operation: 6:00AM-4:30PM, Monday through Friday. Due to current demand the hours of operation are 6:00AM-4:30PM Monday through Thursday, with some Fridays. If a holiday the source still operates a four day work week.		

SOURCE PERSONNEL INTERVIEWED			
Name	Title	Phone Number	Email Address
Lynn Peterson	Human Resources Generalist	574-294-7511 ext 1454 574-903-6066 Cell	lpeterson@cana-inc.com

SOURCE PERSONNEL INTERVIEWED			
Dan Garman	Continuous Improvement Manager	O: 574-262-7385 C: 574-361-5362	dgarman@canna-inc.com
Terry Mead	Maintenance Manager	C:574-292-1043	
Vikor Demchuk	Assembly Supervisor	C: 574-349-3806	

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	Inspection/Complaint Type	Result	Comments
08/20/2020	CMS	Violations Noted	ACES# 250299, 250300 Condition D.1.8(b) Record Keeping, Weekly Stack Observations. E.2.2(7) Record Keeping, Monthly Leak Inspections. §63.803(c), §63.806(e)(2)
05/11/2022	CMS	No Violations Noted	None

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)			
Informal Enforcement Actions			
Date Issued	Action Taken	Describe Violation(s)	
08/24/2020	Violation Letter	D.1.8(b) - Record-Keeping, Stack observations from the surface coating operations are not being recorded weekly as required (recorded monthly), E.2.2(7) - § 63.806(e)(2) [Record-Keeping], monthly Leak Inspections are not being recorded as required by § 63.803(c).	
06/29/2023	Violation Letter	ACES#s 285480, 284410 - B.9(a) – Annual Compliance Certification, late submittal.	
Formal Enforcement Actions			
Case Number	Enforcement Type	Civil Penalty	Describe Violation(s)
N/A		\$	
Other Relevant Actions			
Action Taken	Comments		
N/A			

PERMIT SECTION D.1
Emission Units and Control Devices:
<b>Emissions Unit Description:</b>
<u>Plant 1:</u>
(a) Two (2) spray booths, identified as SS-11 and SS-21, approved in 2018 for construction, approved in 2023 for modification, with maximum capacities of 211.76 wood parts per hour for SS-11 and 176.47 wood parts per hour for SS-21, using dry filters as control, and exhausting to stacks S-11 and S-21, respectively.
(b) Six (6) spray booths, identified as ST-12, ST-13, ST-14, ST-22, ST-23, and ST-24, approved in 2018 for construction, with ST-22 approved in 2023 for modification, with maximum capacities of 211.76 wood parts per hour for ST-12, ST-13, and ST-14 and 176.47 wood parts per hour for ST-22, ST-23, and ST-24, using dry filters as control, and exhausting to stacks S-12, S-13, S-14, S-22, S-23, and S-24, respectively.

**PERMIT SECTION D.1**

Under the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ), these coating operations are considered to be an existing wood furniture surface coating operation.

Plant 2:

- (d) One (1) linear sealer booth, identified as SB-1, equipped with airless spray guns, constructed in 1990, approved in 2023 for modification, with a maximum throughput of 240.00 wood parts per hour, with dry filters for control, exhausting to Stack S-1.
- (e) One (1) linear topcoat booth, identified as SB-2, equipped with airless spray guns, constructed in 1993, approved in 2023 for modification, with a maximum throughput of 514.29 wood parts per hour, with dry filters for control, exhausting to Stack S-2.
- (f) One (1) linear topcoat booth, identified as SB-3, equipped with airless spray guns, approved in 2018 for construction, approved in 2023 for modification, with a maximum throughput of 371.43 wood parts per hour, using dry filters as control, and exhausting to stack S-2.

Under the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ), these coating operations are considered to be an existing wood furniture surface coating operation.

**Specifically Regulated Insignificant Activities:**

- (b) Plant 1 open gluing areas, identified as Panel Assembly and Door Assembly, constructed in 1990, with a maximum capacity of 66.67 parts per hour and 329.41 parts per hour, respectively, and exhausting outdoors.

Under the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ), this gluing operation is considered to be an existing wood furniture surface coating operation.

- (c) Two (2) lineal stain/primer/paint vacuum coating machines with non-atomized flow applicator, located in Plant 2.

Under the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ), these coating operations are considered to be an existing wood furniture surface coating operation.

- (e) Plant 2 open gluing areas, approved in 2018 for construction, with a maximum capacity of 550 gallons of glue per year, uncontrolled, and exhausting to the indoors.

Under the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ), this gluing operation is considered to be an existing wood furniture surface coating operation.

Pollutants with Emission Limits or Applicable Standards:

- SO<sub>2</sub>  NO<sub>x</sub>  CO  VOC  PM  PM<sub>10</sub>  PM<sub>2.5</sub>  HAPS

Applicable Rules:

- 326 IAC 6-3-2, 326 IAC 8-2-12

<u>Requirement:</u>	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

PERMIT SECTION D.1			
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 content and amount of materials monthly, daily dry filter, weekly stack and monthly ground, roof logs.			
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Observations and Comments:			
<p>Upon arrival at the site, there was no opacity observed from the stacks. Ms. Peterson met with Ms. Balla for an opening meeting. Ms. Peterson and Mr. Dan Garmin escorted Ms. Balla through the facility.</p> <p>Plant 2 contains three linear topcoat booths; dry filters were installed. The three linear booths have an attached cabinet containing dry filters. No violations were determined with regard to placement, integrity and particle loading of the filters for Plants 2.</p> <p>Patrick Industries, dba CANNA, Inc. (PICl) uses a drone to observe the stacks and roofs to determine if overspray was present.</p> <p>Plant 1 is a newer building and contained eight (8) surface coating booths on the mezzanine. Dry particulate filters were installed and there was no separation between the filters and the exhaust. The filters were not torn or did not appear to be damaged. No violations were observed or determined regarding the placement, integrity, and particle loading of the filters for Plants 1.</p> <p>Daily filter checks, as well as weekly and monthly overspray checks are performed and logged. No overspray was observed on the ground, building or stacks. No violations were observed or determined at the time of the inspection.</p> <p>All containers containing VOCs and HAPs were closed.</p> <p>VOC records were available at the time of the inspection. No violations were observed or determined at the time of the inspection.</p> <p>The PMP for the coating operation was detailed and complete. No violations were observed or determined at the time of the inspection.</p>			
<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observation</i>
SS-11 and SS-21 Dry filters	The Permittee shall operate the control devices in accordance with manufacturer's specifications.	Installed with no gaps	Installed with no gaps
ST-12, ST-13, ST-14, ST-22, ST-23, and ST-24 Dry filters	The Permittee shall operate the control devices in accordance with manufacturer's specifications.	Installed with no gaps	Installed with no gaps
SB-1 Dry filters	The Permittee shall operate the control devices in accordance with manufacturer's specifications.	Installed with no gaps	Installed with no gaps
SB-2 Dry filters	The Permittee shall operate the control devices in accordance with manufacturer's specifications.	Installed with no gaps	Installed with no gaps
SB-3 Dry filters	The Permittee shall operate the control devices in accordance with manufacturer's specifications.	Installed with no gaps	Installed with no gaps

**PERMIT SECTION D.1**

Permit Section Compliance Status:

- No violations were observed or determined for this permit section at the time of the inspection.
- The following violations were determined for this permit section at the time of the inspection:

**PERMIT SECTION D.2**

Emission Units and Control Devices:

**Emissions Unit Description:**

- (c) Woodworking operations, identified as WW-1, approved in 2018 for construction, with a maximum capacity of 29,563 pounds of wood per hour, using dust collectors DC-01 and DC-04 as control, exhausting to stacks S-1N and S-1S, and consisting of the following operations and woodworking equipment:

Plant 2:

- (1) Mill Room
  - (A) One (1) Gang Rip Saw
  - (B) One (1) Paul Saw
  - (C) Three (3) Molders, identified as Molder 1 through Molder 3
  - (D) One (1) Resaw
  - (E) One (1) Tennonner
  - (F) One (1) Planar Sander
  - (G) One (1) Horizontal Grinder
  - (H) One (1) Vertical Grinder
  - (I) One (1) Sander
  - (J) Three (3) Chop Saws, identified as Chop Saw 1 through Chop Saw 3

Plant 1:

- (2) Cabinet Shop
  - (A) One (1) Manual Coper
  - (B) One (1) Table Saw
  - (C) One (1) Dovetail Machine
  - (D) One (1) One (1) Shaper
  - (E) One (1) Manual Router
  - (F) One (1) One Chop Saw, identified as Chop Saw 4
  - (G) One (1) Straight Line Sander
- (3) Framing Area
  - (A) Two (2) Pocket Screw Machines

Plant 1:

- (g) Woodworking operations, identified as WW-2, constructed in 1994, with a maximum throughput of 40,810 pounds of wood per hour, with one (1) cyclone and one (1) baghouse identified as DC-02, for control, maximum air flow rate of 23,000 cfm, exhausting to stack DC-02, and consisting of the following operations and woodworking equipment:
- (1) Assembly

**PERMIT SECTION D.2**

- (A) One (1) D-Saw
- (B) One (1) Miter Saw
- (C) One (1) Acumiter Saw
- (D) One (1) Floor Mat Coper
- (E) One (1) DET Shaper
- (F) Once (1) CNC Machine
- (G) One (1) Panel Saw
- (H) One (1) Chop Saw, identified as Chop Saw 5

(2) Finishing Department

- (A) One (1) Linear Line Panel Brush Sander
- (B) One (1) Linear Line Chop Saw
- (C) One (1) Bottom Head Sander
- (D) One (1) Top Head Sander
- (E) One (1) Brush Sander

Pollutants with Emission Limits or Applicable Standards:

SO<sub>2</sub>  NO<sub>x</sub>  CO  VOC  PM  PM<sub>10</sub>  PM<sub>2.5</sub>  HAPS

Applicable Rules:

N/A

<u>Requirement:</u>	<u>Applicable</u>	<u>Violation Noted</u>
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: daily visible emission notations and reason for not taken

Reporting Requirements  Yes  No  Yes  No

Observations and Comments:

At the time of the inspection the control equipment was in operation. The baghouse and cyclone (located outside) were in operation at the time of the inspection. An inspection of the outside ductwork determined that there were no leaks in the system. No visible emissions were determined. No violations were observed or determined at the time of the inspection regarding particulate control. PICI conducts quarterly baghouse inspections, and the last inspection was conducted in April 2024 and two repairs were conducted on March 12 and 29, 2024.

<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observation</i>
WW-1 dust collectors DC-01 and DC-04	The Permittee shall operate the control device in accordance with manufacturer's specifications.	Shall be in operation at all times that the woodworking operations are in operation.	Operating
WW-2 Cyclone and baghouse DC-02	The Permittee shall operate the control device in accordance with manufacturer's specifications.	Shall be in operation at all times that the woodworking operations are in operation.	Operating

Permit Section Compliance Status:



**PERMIT SECTION D.2**

- No violations were observed or determined for this permit section at the time of the inspection.
- The following violations were determined for this permit section at the time of the inspection:

**PERMIT SECTION E.1**

**Emission Units and Control Devices:**

**Emissions Unit Description:**

Plant 1:

- (a) Two (2) spray booths, identified as SS-11 and SS-21, approved in 2018 for construction, approved in 2023 for modification, with maximum capacities of 211.76 wood parts per hour for SS-11 and 176.47 wood parts per hour for SS-21, using dry filters as control, and exhausting to stacks S-11 and S-21, respectively.
- (b) Six (6) spray booths, identified as ST-12, ST-13, ST-14, ST-22, ST-23, and ST-24, approved in 2018 for construction, with ST-22 approved in 2023 for modification, with maximum capacities of 211.76 wood parts per hour for ST-12, ST-13, and ST-14 and 176.47 wood parts per hour for ST-22, ST-23, and ST-24, using dry filters as control, and exhausting to stacks S-12, S-13, S-14, S-22, S-23, and S-24, respectively.

Under the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ), these coating operations are considered to be an existing wood furniture surface coating operation.

Plant 2:

- (d) One (1) linear sealer booth, identified as SB-1, equipped with airless spray guns, constructed in 1990, approved in 2023 for modification, with a maximum throughput of 240.00 wood parts per hour, with dry filters for control, exhausting to Stack S-1.
- (e) One (1) linear topcoat booth, identified as SB-2, equipped with airless spray guns, constructed in 1993, approved in 2023 for modification, with a maximum throughput of 514.29 wood parts per hour, with dry filters for control, exhausting to Stack S-2.
- (f) One (1) linear topcoat booth, identified as SB-3, equipped with airless spray guns, approved in 2018 for construction, approved in 2023 for modification, with a maximum throughput of 371.43 wood parts per hour, using dry filters as control, and exhausting to stack S-2.

Under the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ), these coating operations are considered to be an existing wood furniture surface coating operation.

**Specifically Regulated Insignificant Activities:**

- (b) Plant 1 open gluing areas, identified as Panel Assembly and Door Assembly, constructed in 1990, with a maximum capacity of 66.67 parts per hour and 329.41 parts per hour, respectively, and exhausting outdoors.  
  
Under the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ), this gluing operation is considered to be an existing wood furniture surface coating operation.
- (c) Two (2) lineal stain/primer/paint vacuum coating machines with non-atomized flow applicator, located in Plant 2.

<b>PERMIT SECTION E.1</b>		
<p>Under the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ), these coating operations are considered to be an existing wood furniture surface coating operation.</p> <p>(e) Plant 2 open gluing areas, approved in 2018 for construction, with a maximum capacity of 550 gallons of glue per year, uncontrolled, and exhausting to the indoors.</p> <p>Under the National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations (40 CFR 63, Subpart JJ), this gluing operation is considered to be an existing wood furniture surface coating operation.</p>		
<u>Pollutants with Emission Limits or Applicable Standards:</u>		
<input type="checkbox"/> SO <sub>2</sub> <input type="checkbox"/> NO <sub>x</sub> <input type="checkbox"/> CO <input type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM <sub>10</sub> <input type="checkbox"/> PM <sub>2.5</sub> <input checked="" type="checkbox"/> HAPS		
<u>Applicable Rule:</u>		
40 CFR Part 63, Subpart JJ		
<u>Applicability Information:</u>		
<p>Patrick Industries dba CANA, Inc is a manufacturer of wood furniture or wood furniture components, and the plant site is a major existing source.</p> <p>Compliance date: 11/21/1997</p>		
<u>Requirement:</u>	Applicable	Violation Noted
Emission Limitations/Standards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Work Practice/Operating Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Compliance Monitoring Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Testing Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Record Keeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Types of Records Reviewed: HAP content, operator training		
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Preventive Maintenance Plan [326 IAC 1-6-3]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<u>Observations and Comments:</u>		
<p>PICI uses coating materials as supplied—no thinners are used. Adhesives contain no HAPs. Water is used for cleaning water-based coating equipment. Acetone is used to clean solvent applying equipment.</p> <p>Operator training records were reviewed. The annual training was conducted on November 9, 2023, November 19, 2022, and December 2, 2021 by D&amp;B Environmental Services, Osceola, Indiana.</p> <p>Leak inspection records were not available for review. PICI does have a log sheet for monitoring the monthly leak detections but had not been using it. Additionally, PICI stated in the second half 2022, first half 2023 and second half 2023 40 CFR 63, Subpart JJ Semiannual Compliance Status Report stated that the source was in compliance for Work Practice Standards. There was a change in personnel and the monthly monitoring of leak inspections were not conducted from June 2022 to present, in violation of Permit No.44866, 46880 and 46921, Condition E.1.2(4), §63.803(c)(1) Work Practice Standards, E.1.2(7), §63.806(e)(2) Record Keeping Requirements.</p> <p>PICI does not use strippable paint booth coating.</p> <p>The source uses coatings that contain trace amounts of formaldehyde and are less than the 1% by weight limit. No violations were observed or determined at the time of the inspection.</p> <p>The Semi-annual Compliance Report 40 CFR 63, Subpart JJ for the 2<sup>nd</sup> half of 2022, 1<sup>st</sup> half of 2023 and 2<sup>nd</sup> half of 2023 showed VHAP content below permit limits.</p>		

<b>PERMIT SECTION E.1</b>			
<i>Emission Unit or Control Device</i>	<i>Parameter</i>	<i>Permitted Value/Range</i>	<i>Observation</i>
None for HAPs			
SS-11 and SS-21 Dry filters	The Permittee shall operate the control devices in accordance with manufacturer's specifications.	Installed with no gaps	Installed with no gaps
ST-12, ST-13, ST-14, ST-22, ST-23, and ST-24 Dry filters	The Permittee shall operate the control devices in accordance with manufacturer's specifications.	Installed with no gaps	Installed with no gaps
SB-1 Dry filters	The Permittee shall operate the control devices in accordance with manufacturer's specifications.	Installed with no gaps	Installed with no gaps
SB-2 Dry filters	The Permittee shall operate the control devices in accordance with manufacturer's specifications.	Installed with no gaps	Installed with no gaps
SB-3 Dry filters	The Permittee shall operate the control devices in accordance with manufacturer's specifications.	Installed with no gaps	Installed with no gaps

**Permit Section Compliance Status:**

- No violations were observed or determined for this permit section at the time of the inspection.
- The following violations were determined for this permit section at the time of the inspection:
- 1) PICI failed to conduct monthly visual leak inspections for all equipment used to transfer or apply coatings and adhesives. Leak inspection records were not available for review. Leak inspections were not conducted from June 2022 to June 6, 2024, in violation of Permit No.44866, 46880 and 46921, Condition E.1.2(4), §63.803(c)(1) Work Practice Standards.
  - 2) PICI failed to document monthly visual leak inspections for all equipment used to transfer or apply coatings and adhesives. Leak inspection records were not available for review from June 2022 to June 6, 2024, in violation of Permit No.44866, 46880 and 46921, Condition E.1.2(7), §63.806(e)(2) Record Keeping Requirements.

**ADDITIONAL SOURCE COMPLIANCE REVIEW:**

The following reports are required and were reviewed:

- Annual Compliance Certification(s)       Deviation & Compliance Monitoring Report(s)
- Annual Notification(s)       Emission Statement(s)

- The reports are consistent with inspection observations.  Yes  No  N/A
- The permit accurately represents emission units observed on site.  Yes  No  N/A
- Compliance assistance was provided during the inspection.  Yes  No  N/A
- The source is required to have a Risk Management Plan [40 CFR 68].  Yes  No
- If yes, the source has a plan.  Yes  No  N/A
- If yes, the employees have been trained.  Yes  No  N/A

**Additional Information and Comments:**

None.

**ADDITIONAL SOURCE COMPLIANCE REVIEW:**

Additional Source Compliance Review Status:

- No violations were observed or determined for this permit section at the time of the inspection.
- The following violations were determined for this permit section at the time of the inspection:

**INSPECTION FINDINGS**

- No violations were observed or determined at the time of the inspection.
- The following violations were determined at the time of the inspection:

- 1) PICI failed to conduct monthly visual leak inspections for all equipment used to transfer or apply coatings and adhesives. Leak inspection records were not available for review. Leak inspections were not conducted from June 2022 to June 6, 2024, in violation of Permit No.44866, 46880 and 46921, Condition E.1.2(4), §63.803(c)(1) Work Practice Standards.
  
- 2) PICI failed to document monthly visual leak inspections for all equipment used to transfer or apply coatings and adhesives. Leak inspection records were not available for review from June 2022 to June 6, 2024, in violation of Permit No.44866, 46880 and 46921, Condition E.1.2(7), §63.806(e)(2) Record Keeping Requirements.

RECOMMENDED ACTION	Issue inspection summary/enforcement action letter and refer source for enforcement.
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EXIT INTERVIEW	I explained my findings, recommendations, and conclusions with Ms. Peterson, Dan Garman, and Terry Mead prior to exiting the facility.
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**ATTACHMENTS**

- Inspection Summary Enforcement Action Letter

**From:** [Lynn Peterson](#)  
**To:** [ROBERTS, GOLDIE](#)  
**Subject:** RE: Patrick Industries d/b/a CANA, Inc. - (039-00005) Inspection Summary/Enforcement Action Letter  
**Date:** Wednesday, June 19, 2024 2:54:05 PM

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\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\*

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received

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**From:** ROBERTS, GOLDIE <GROBERTS@idem.IN.gov>  
**Sent:** Tuesday, June 18, 2024 9:24 AM  
**To:** Lynn Peterson <lpeterson@cana-inc.com>  
**Cc:** Balla, Adrienne <ABalla@idem.IN.gov>; Mclver, David <DMclver@idem.IN.gov>; envhealth@elkhartcounty.com  
**Subject:** Patrick Industries d/b/a CANA, Inc. - (039-00005) Inspection Summary/Enforcement Action Letter  
**Importance:** High

\*\*\*\*\*This Message originated outside your organization.\*\*\*\*\*

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**Subject: Enforcement Action Letter**  
**Patrick Industries d/b/a CANA, Inc. - ID# 039-00005**

Dear Ms. Lynn Peterson:

Please find attached a PDF copy of the Inspection Summary/Enforcement Action Letter issued for Patrick Industries d/b/a CANA, Inc., Elkhart County, IN.  
If you have questions about the inspection or document review that identified the issues noted in the letter, please contact Adrienne Balla, Compliance Inspector, at (574) 229-4701 or [aballa@idem.IN.gov](mailto:aballa@idem.IN.gov).

Please confirm your receipt of this electronic document.

Thank you

**Goldie Roberts**  
**Administrative Assistant**  
**IDEM - Office of Air Quality**  
**Compliance & Enforcement Branch**  
**317-233-5523**  
[groberts@idem.in.gov](mailto:groberts@idem.in.gov)

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