



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

July 5, 2024

VIA ELECTRONIC MAIL

Matt Kovar
2020 Custom Molded Plastics, LLC
785 Decker Drive
Bluffton, IN 46714
mkovar@2020cmp.com

Re: Inspection Summary Letter
2020 Custom Molded Plastics, LLC
Source ID 179-00024
Bluffton, Wells County

Dear Matt Kovar:

On June 27, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of 2020 Custom Molded Plastics, LLC, located at 785 Decker Drive in Bluffton, 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 317-741-0829 or by email at aversema@idem.in.gov.

Sincerely,

Angela Verseman, Compliance Inspector
Compliance Section 1
Office of Air Quality

ACES ID: 298927

ENCLOSURE

cc: Angela Verseman, Compliance and Enforcement Branch, Office of Air Quality

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



SOURCE INFORMATION	
SOURCE NAME	2020 Custom Molded Plastics, LLC
SOURCE LOCATION	785 Decker Drive, Bluffton, Indiana Wells County
MAILING ADDRESS	785 Decker Drive, Bluffton, IN 46714
PLANT ID	179-00024
<u>PERMIT INFORMATION</u>	Permit Type: MSOP Permit Number: 179-46810-00024 Permit Expiration Date: March 27, 2029 VFC Document No.(hyperlink): 83616897
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 high density polyethylene structural foam production plant.

INSPECTION INFORMATION			
INSPECTED BY	Angela Verseman		
INSPECTION DATE AND TIME	June 27, 2024	TIME IN: 1:47 pm	TIME OUT: 2:53pm
REPORTED BY	Angela Verseman	REPORT DATE: June 28,2024	
<u>COMPLIANCE PERIOD REVIEWED</u>	7/24/2020 to 6/27/2024		
<u>INSPECTION NOTIFICATION</u>	<input checked="" type="checkbox"/> Unannounced <input type="checkbox"/> Announced:		
INSPECTION OBJECTIVE(S)	<input type="checkbox"/> Compliance Monitoring Strategy (CMS) <input type="checkbox"/> Mega-Site: <input type="checkbox"/> FCE <input type="checkbox"/> PCE <input type="checkbox"/> Other:	<input checked="" type="checkbox"/> Commitment <input type="checkbox"/> Complaint <input type="checkbox"/> Surveillance	
ACES TRACKING NUMBER(S)	Inspection: 298927	Complaint:	Violation/Warning:
RM TRACKING NUMBER(S)	Complaint:		
<u>INSPECTION BACKGROUND</u>	This is a commitment inspection. Source transitioned from a FESOP to a MSOP on March 27, 2024.		

SOURCE PERSONNEL INTERVIEWED			
Name	Title	Phone Number	Email Address
Matt Kovar	Plant Manager	260-565-2020	mkovar@2020cmp.com

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	Inspection/Complaint Type	Result	Comments
7/23/2020	Commitment	Violations Noted	

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)			
Informal Enforcement Actions			
Date Issued	Action Taken	Describe Violation(s)	
7/23/2020	Violation Letter	Pressure drop readings not taken	
6/23/2020	Violation Letter	Late quarterly report	
6/27/2019	Violation Letter	Late quarterly, modification of equipment, no pressure drop, no calibration of pressure drop gauges	
Formal Enforcement Actions			
Case Number	Enforcement Type	Civil Penalty	Describe Violation(s)
2020-26907-A	Expedited Enforcement	\$ 500.00	Late quarterly, modification of equipment, no pressure drop , no calibration of pressure drop gauges
Other Relevant Actions			
Action Taken	Comments		
None			

PERMIT SECTION D.1					
Emission Units and Control Devices:					
(a) One (1) raw material receiving and handling process, identified as Raw1, and consisting of the following units:					
(1) Twenty five (25) storage silos					
Emission Unit ID	Year Constructed	Maximum Capacity (lbs/hr)	Storage Capacity (lbs)	Control Device	Stack ID
Silo (S1)	1998	3125	190,000	--	SV2
Silo (S2)	1998	3125	190,000	--	
Silo (S3)	1998	3125	190,000	--	SV3
Silo (S4)	1998	3125	190,000	--	
Silo (S5)	2019	3125	150,000	--	SV5
Silo (S6)	2019	3125	190,000	--	SV6
Silo (S7)	2019	3125	75,000	--	SV7
Silo (S8)	2019	3125	168,000	--	SV8
Silo (S9)	2019	3125	75,000	--	SV9
Silo (S10)	2019	3125	168,000	--	SV10
Silo (S11)	2021	3125	75,000	--	SV11
Silo (S12)	2021	3125	158,000	--	SV12
Silo (S13)	2021	3125	75,000	--	SV13
Silo (S14)	2021	3125	158,000	--	SV14
Silo (S15)	2021	3125	75,000	--	SV15
Silo (S16)	2021	3125	85,000	--	SV16
Silo (S17)	2021	3125	85,000	--	SV17
Silo (S18)	2021	3125	135,000	--	SV18
Silo (S19)	2021	3125	75,000	--	SV19
Silo (S20)	2021	3125	85,000	--	SV20
Silo (S21)	2021	3125	75,000	--	SV21

PERMIT SECTION D.1						
Silo (S22)	2021	3125	135,000	--	SV22	
Silo (S23)	Approved in 2024 for construction	3125	100,000	--	SV23	
Silo (S24)	Approved in 2024 for construction	3125	100,000	--	SV24	
Silo (S25)	Approved in 2024 for construction	3125	100,000	--	SV25	
	Total	78,125	--	--		

2) Two (2) vacuum receivers:

Emission Unit ID	Year Constructed	Maximum Capacity (lbs/hr)	Control Device	Stack ID
	1998	28,000	Filter (V1)	SV1
	Approved in 2024 for Construction	15,000	Filter (R2)	SR2
	Total	43,000	--	--

(b) One (1) intermediate material handling process, identified as Intermediate 1, and consisting of the following units:

(1) Two (2) surge bins, identified as SB01 and SB02, constructed in 1998, each with a maximum capacity of 12,500 pounds per hour, controlled by two (2) baghouses, identified as V4 and V5, respectively, and exhausting indoors.

(2) One (1) pressure receiver, identified as VF06, constructed in 1998, with a maximum capacity of 15,500 pounds per hour, controlled by a filter, identified V6 for industrial hygiene purposes, and exhausting indoors.

(c) Thirty-four (34) receiving units, identified as MaGuire1 through MaGuire34, constructed in 2021, each with a maximum capacity of 2,375 pounds per hour, using a filter (V7) as controls for industrial hygiene purposes, and exhausting to stacks MS1 through MS34. The throughput of each receiving unit is limited by the press unit associated with it.

(d) Thirty (30) high density polyethylene foam extruder/injection molding processes, using no control, exhausting indoors, and consisting of the following

Emission Unit ID	Year Constructed	Maximum Capacity (lbs/hr)
PressF-0	2021	1518
Press F -1	2021	3036
Press F-2	2012*	3036
Press F -3	1998*	1518
Press F -4	1998*	1518
Press F -5	1998*	1518
Press F -6	1998*	1518
Press F -7	2007*	1518
Press F -8	2021	1518
Press F -9	1998*	1518
Press F -10	2007*	1518
Press F -11	1998*	1518

PERMIT SECTION D.1			
Press F -12	1998*	1518	
Emission Unit ID	Year Constructed	Maximum Capacity (lbs/hr)	
Press F-13	1998*	1518	
Press F -14	2021	3036	
Press F -15	2021	3036	
HP-1	2021	300	
HP-2	2021	300	
HP-3	2021	300	
HP-4	2021	300	
HP-5	2021	325	
HP-6	2021	325	
HP-7	2021	325	
HP-8	2023	306	
HP-9	2023	367	
HP-10	2023	367	
Midway -1	2023	1518	
Midway -2	2023	1518	
FM-1	2023	1518	
FM-2	2023	1518	
	Total	39,647	

(e) One (1) grinding operation, identified as GR1, constructed in 1998, approved in 2024 to increase maximum capacity, with a maximum capacity of 800 pounds of polyethylene scrap per hour, utilizing a cyclone (C1) for particulate control for industrial hygiene purposes, and exhausting indoors.

Pollutants with Emission Limits or Applicable Standards:

SO₂ NO_x CO VOC PM PM₁₀ PM_{2.5} HAPS

Applicable Rules:

- 326 IAC 6-3-2

Requirement:

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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Testing Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Recordkeeping Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

Types of Records Reviewed:

Reporting Requirements	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
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Observations and Comments:

The source was operating at the time of the inspection. At 2020 Custom Molded Plastics, LLC they make various plastic structures. The receivers pull material from rail car and convey it into the silo. For the emission units the silos hold the material for the source. The MaGuires pull the material from the silos to make the product. Source recycles the scrap plastic they can. The grinding process grinds up plastic and turns the plastic back into material. The source has a preventive maintenance plan that seems adequate. Prior to March 27, 2024, source had a FESOP. The source had a checklist and completed preventive maintenance as equipment recommends. Visible emission notations were taken daily on a checklist. The pressure drop of water was between 1.0 to 3.0 inches of water per parametric monitoring on a daily basis as well.

Permit Section Compliance Status:

PERMIT SECTION D.1

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:

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.	<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:

Source has submitted their 2023 ACC in a timely manner. They are aware that next year due to permit change they will submit an annual compliance certification for FESOP requirements and an annual notification for MSOP requirements.

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:

RECOMMENDED ACTION	Issue inspection summary letter.
EXIT INTERVIEW	I explained my findings, recommendations, and conclusions with Mr. Kovar prior to exiting the facility.

ATTACHMENTS

- None