Enkei America, Inc. Columbus, Indiana 47201 Telephone (812) 373-7000 Facsimile (812) 373-7201



June 17, 2024

Melanie Raplee
Compliance Inspector
Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ)
100 N. Senate Avenue
Indianapolis, IN 46204

Dear Melanie,

Thank you for your inspection here at Enkei America, Inc. on May 14, 2024. In response to your Inspection Summary / Violation letter, I am communicating our corrective actions to

In response to your Inspection Summary / Violation letter, I am communicating our corrective actions to following violations.

- 1) Pursuant to 326 IAC 8-3-2 and Permit No. 45206 Condition D.3.1 all degreasers must be closed when not in use.
- 2) Pursuant to 326 IAC 8-3-2 and Permit No. 45206 Condition D.3.1 all degreasers must also be labeled with the operating requirements in subdivisions (3), (4), (6), and (7) found in the above permit condition.

Attached are the corrective action requests that were created upon the receipt of your Inspection Summary / Violation letter. They include description of the violation, root cause analysis, short- and long-term corrective action and evidence of the implementation of our corrective action.

If you have questions or need additional information, please contact me at 812-373-7001 X-1411 or cell # 317-437-1267 or email to mwirt@enkeiamerica.com

Sincerely,

Matt Wirt

Environmental Manager

Enkei America, Inc.

CORRECTIVE ACTION REQUEST (CAR)			CAR#		RETURN TO				
FUNCTION/AREA/PROCESS			,	24-141 Matt Wirt					
Maintenance (Process Repair) Cam Lynch				V					
DATE ISSUED DATE DUE					CAR ORIGIN				
05/17/24 6/10/24				IDEM - Air Permit inspection - Violation					
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Matt Wirt 06/17/24									

Page 37 of 54 T005-45206-00042

Enkei America, Inc. Columbus, Indiana

Permit Reviewer: Daniel W. Pell

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities

(a) Four (4) cold solvent Degreasing operations that do not exceed a total of 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2] Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

- (a) Ensure the following control equipment and operating requirements are met:
 - (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

326 IAC 8-3-2 - Cold cleaner degreaser control equipment and operating requirements

State Regulations Compare Authority: IC 13-14-8; IC 13-17-3-4; IC 13-17-3-11; IC 13-17-3-12 Affected: IC 13-17-3 (a) The owner or operator of a cold cleaner degreaser shall comply with the following control equipment and operating requirements: (1) Equip the degreaser with a cover. (2) Equip the degreaser with a device for draining cleaned parts. (3) Close the degreaser cover whenever parts are not being handled in the degreaser. (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7). (6) Store waste solvent only in closed containers. (7) Prohibit the disposal or transfer of waste solvent in a manner that would allow greater than twenty percent (20%) of the waste solvent by weight to evaporate into the atmosphere. (b) The owner or operator of a cold cleaner degreaser subject to this subsection shall comply with the following additional control equipment and operating (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit): (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater. (B) A water cover when solvent used is insoluble in, and heavier than, water. (C) A refrigerated chiller. (D) Carbon adsorption. (E) VOC emission control equipment operated in accordance with section 8(b)(3) of this rule. (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated. (3) If used, solvent spray must be: (A) performed in an enclosed chamber, with or without venting; or (B) a solid, fluid stream applied at a pressure that does not cause excessive splashing.

Notes

326 IAC 8-3-2 Air Pollution Control Division; 326 IAC 8-3-2; filed Mar 10, 1988, 1:20 p.m.: 11 IR 2537; readopted filed Jan 10, 2001, 3:20 p.m.: 24 IR 1477; filed Jan 30, 2013, 12:33 p.m.: 20130227-IR-326070352FRA Filed 5/11/2021, 11:22 a.m.: 20210609-IR-326180542FRA

CHECK INDEX BEFORE USE

Root Cause Analysis	CAR # 24-141					
This Page is to be used to: A) Provide space for documentation of methodical problem solving approach. B) Sign off for Root Cause Analysis by Initiator.						
Root Cause Analysis						
why was the lid open when not in use						
Maintenance Tech left lid open because they didn't understand the importance of closing it.						
ACCEPTANCE AND REVIEW	OF ROOT CALISE ANALYSIS					
CAR ACCEPTED BY AND DATE	ANALYSIS APPROVED BY AND DATE					
Matt Wirt 06/17/24						

Evidence of Implementation

CAR # 24-141

This Page is to be used to:

- A) Provide space for Evidence of Implementation
- B) Sign off for Implementation

Evidence of Implementation

A)



ACCEPTANCE AND REVIEW OF IMPLEMENTATION

CAR ACCEPTED BY AND DATE
Matt Wirt 06/17/24

IMPLEMENTATION VERIFIED BY AND DATE

CHECK INDEX BEFORE USE

Evidence of Effectiveness		CAR # 24-141
This Page is to be used to: A) Document how Effectiveness will be verified. (At tim B) Provide space for Evidence of Effectiveness C) Sign off for Effectiveness		
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Evidence of	Effectiveness	
B)	Effectiveness	
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3								
Yes					Yes	No		
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If yes, is Poka Yoke confirmation frequency documented?								
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Matt Wirt 6/14/24								
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Matt Wirt 6/14/24								



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

May 16, 2024

VIA ELECTRONIC MAIL Matt Wirt Enkei America, Inc 2900 W Inwood Drive Columbus, IN 47201-9758

> Inspection Summary/Violation Letter Enkei America, Inc Source ID 005-00042 Columbus, Bartholomew County

Dear Matt Wirt:

On May 14, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Enkei America, Inc, located at 2900 W Inwood Drive in Columbus, Indiana. This inspection was conducted pursuant to IC 13-14-22. 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

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

- Pursuant to 326 IAC 8-3-2 and Permit No. 45206 Condition D.3.1 all degreasers must be closed when not in use.
 Pursuant to 326 IAC 8-3-2 and Permit No. 45206 Condition D.3.1 all degreasers must
- also be labeled with the operating requirements in subdivisions (3), (4), (6), and (7) found in the above permit condition.

Within thirty (30) days of the date of this letter, a written detailed explanation, documenting how compliance with each of the violations listed above will be achieved and maintained. Photo evidence of the new labels posted at each of the degreasers as well as a copy of the label for proofing in the correspondence, which is only required if the label is not legible from the photos alone. The above example is what is required to be submitted to the inspector. The required submittal should be sent via email to:

Melanie Raplee, Compliance Inspector, at MRaplee@idem.IN.gov

Page 37 of 54 T005-45206-00042

Enkei America, Inc. Columbus, Indiana

Permit Reviewer: Daniel W. Pell

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326 IAC 8-3-2 Air Pollution Control Division; 326 IAC 8-3-2; filed Mar 10, 1988, 1:20 p.m.: 11 IR 2537; readopted filed Jan 10, 2001, 3:20 p.m.: 24 IR 1477; filed Jan 30, 2013, 12:33 p.m.: 20130227-IR-326070352FRA Filed 5/11/2021, 11:22 a.m.: 20210609-IR-326180542FRA

CHECK INDEX BEFORE USE

CAR# **Root Cause Analysis** 24-142 This Page is to be used to: A) Provide space for documentation of methodical proble solving approach. B) Sign off for Root Cause Analysis by Intiator. **Root Cause Analysis** During the audit on 5/14/24, the IDEM inspector observed in the location of all solvent degreaser the proper operational requirements were not posted. Pursuant to 326 IAC 8-3-2 and Permit No. 45206 Condition D.3.1 all degreasers must also be labeled with the operating requirements in subdivisions (3), (4), (6), and (7) found in the above permit condition. 1 why The existing Enkei America Environmental Management System did not include a document that could be posted with the requirements of subdivisions (3), (4), (6) & (7) found in section D.3.1 (a). 2 why During the document review process for our new Title V Operating Permit renewal, the ECO did not confirm that all degreasers had the necessary labeling to meet the operating requirements in subdivisions (3), (4), (6) & (7) found in section D.3.1 (a) of the new Air Permit. 3 why Failure of the ECO to understand the specific posting requirement of this section of the Air Permit.

ACCEPTANCE AND REVIEW OF ROOT CAUSE ANALYSIS

ANALYSIS APPROVED BY AND DATE

CAR ACCEPTED BY AND DATE

Matt Wirt 6/14/24

Cold Solvent Degreasing Operations

Per the Enkei America - Columbus Title V Air permit and Indiana law 326 IAC 8-3-2 Cold degreaser control equipment and operating requirements, we shall ensure the following control equipment and operating requirements to be met:

- 1. Equip the degreaser with a cover.
- 2. Equip the degreaser with a device for draining cleaned parts.
- 3. CLOSE the degreaser cover whenever parts are not being handled in the degreaser.
- 4. DRAIN cleaned parts for at least fifteen (15) seconds or until dripping ceases.
- 5. Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6) and (7)
- 6. Store waste solvent in only closed containers.
- 7. Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater that twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

Check Index Before Use

Operaciones de desengrase con disolventes en frío

Según el permiso aéreo del Título V de Enkei America - Columbus y la ley de Indiana 326 IAC 8-3-2 Equipo de control de desengrasante en frío y requisitos operativos, nos aseguraremos de que se cumplan los siguientes requisitos de control y funcionamiento:

- 1. Equipe el desengrasante con una cubierta.
- 2. Equipe el desengrasante con un dispositivo para drenar las piezas limpias.
- 3. CIERRE la tapa del desengrasante siempre que no se estén manipulando piezas en el desengrasante.
- 4. **ESCURRA** las piezas limpias durante al menos quince (15) segundos o hasta que cese el goteo.
- 5. Proporcionar una etiqueta permanente y visible que enumere los requisitos operativos en las subdivisiones (3), (4), (6) y (7)
- 6. Guarde el disolvente de desecho solo en recipientes cerrados.
- 7. Prohibir la eliminación o transferencia de solventes residuales de tal manera que puedan permitir que más del veinte por ciento (20%) del solvente residual (en peso) se evapore a la atmósfera.



CHECK INDEX BEFORE USE SS ENKEI TRAINING SIGNATURE ROSTER Instructors: Please here employees sign and date. Record number of instruction hours. If course is multiple days, employees should sign on the day of completion. Course (\$\text{bl}\) SOLUBIT DECREASING OPERATION \(\text{VendorInstructor} \) MATT WIRT

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Signature

A Yardo Garcia Date 6-7-24 Print Name (Legibly)
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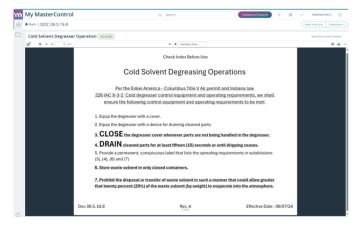
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Kerry Kopp	Signature	Date
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