



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

July 2, 2024

VIA ELECTRONIC MAIL

Ken Ernsberger
Topeka Graphics, Inc.
428 Hawpatch Drive
Topeka, Indiana 46571
ken.topgrafx@gmail.com

Re: Inspection Summary Letter
Topeka Graphics, Inc.
Source ID 087-00082
Topeka, LaGrange County

Dear Ken Ernsberger:

On July 1, 2024, a representative of the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), conducted an inspection of Topeka Graphics, Inc., located at 428 Hawpatch Drive in Topeka, 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 574-261-4003 or by email at jealexan@idem.in.gov.

Sincerely,

John Alexander, Compliance Inspector
Northern Regional Office
Office of Air Quality

ACES ID: 299049

ENCLOSURE

cc: John Alexander, Compliance and Enforcement Branch, Office of Air Quality

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



SOURCE INFORMATION	
SOURCE NAME	Topeka Graphics, Inc.
SOURCE LOCATION	428 Hawpatch Drive, Topeka, Indiana LaGrange County
MAILING ADDRESS	428 Hawpatch Drive, Topeka, Indiana 46571
PLANT ID	087-00082
<u>PERMIT INFORMATION</u>	Permit Type: FESOP Permit Number: 38347 Permit Expiration Date: 10/06/2027 VFC Document No.(hyperlink): 80532617
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 checked="" 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 recreational vehicle (RVs) graphic design painting operation.

INSPECTION INFORMATION			
INSPECTED BY	John Alexander <i>JA</i>		
INSPECTION DATE AND TIME	July 1, 2024	TIME IN: 9:10 am	TIME OUT: 9:15 am
REPORTED BY	John Alexander <i>JA</i>	REPORT DATE: 7/01/2024	
<u>COMPLIANCE PERIOD REVIEWED</u>	July 2, 2019 to July 1, 2024		
<u>INSPECTION NOTIFICATION</u>	<input checked="" type="checkbox"/> Unannounced Attempted, plant shut down for the week. <input type="checkbox"/> Announced:		
INSPECTION OBJECTIVE(S)	<input 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 checked="" type="checkbox"/> Other: Attempted <input type="checkbox"/> Surveillance		
ACES TRACKING NUMBER(S)	Inspection: 299049	Complaint:	Violation/Warning:
RM TRACKING NUMBER(S)	Complaint:		
<u>INSPECTION BACKGROUND</u>	The most recent compliance inspection was conducted on April 3, 2019. No violations were observed. The purpose of this inspection was to determine compliance with the company's permit and any additional state or federal air rules.		

SOURCE PERSONNEL INTERVIEWED			
Name	Title	Phone Number	Email Address
N/A			

INSPECTION AND COMPLAINT HISTORY (PREVIOUS 5 YEARS)			
Date	Inspection/Complaint Type	Result	Comments
N/A			

COMPLIANCE HISTORY (PREVIOUS 5 YEARS)			
Informal Enforcement Actions			
Date Issued	Action Taken	Describe Violation(s)	
N/A			
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:
Emissions Unit Description:
<p>(a) One (1) spray booth, identified as SB1, constructed in 2000, utilizing HVLP spray application, using fabric filters, identified as PF1, as particulate control, exhausting to stack 1 (S1) and stack 2 (S2), and equipped with 4 spray guns (SG1 through SG4), with a total maximum capacity of 0.68 vehicles per hour.</p> <p>Under 40 CFR Part 63, Subpart HHHHHH, spray booth SB1 is considered an affected facility.</p>
<p>(b) One (1) spray booth, identified as SB2, constructed in 2000, utilizing HVLP spray application, using fabric filters, identified as PF2, as particulate control, exhausting to stack 3 (S3) and stack 4 (S4), and equipped with 4 spray guns (SG5 through SG8), with a total maximum capacity of 0.68 vehicles per hour.</p> <p>Under 40 CFR Part 63, Subpart HHHHHH, spray booth SB2 is considered an affected facility.</p>
<p>(c) One (1) spray booth, identified as SB3, constructed in 2000, utilizing HVLP spray application, using fabric filters, identified as PF3, as particulate control, exhausting to stack 5 (S5), and equipped with 1 spray gun (SG9), with a maximum capacity of 2.33 parts per hour.</p> <p>Under 40 CFR Part 63, Subpart HHHHHH, spray booth SB3 is considered an affected facility.</p>
<p>(d) One (1) touch up spray gun, identified as SG10, constructed in 2000, utilizing HVLP spray application, with a maximum capacity of 0.17 vehicles per hour, using no controls, and exhausting indoors.</p> <p>Under 40 CFR Part 63, Subpart HHHHHH, spray gun SG10 is considered an affected facility.</p>
Insignificant Activities:
<p>(a) Two (2) natural gas fired air makeup unit, identified as AMU1 and AMU2, constructed in 2000, each with a heat input rate of 2.5 million British thermal units (MMBtu) per hour, using no controls, and exhausting to stack 6 and stack 7. Stacks are 24' high (from ground) with a diameter of 8".</p>

PERMIT SECTION D.1

- (b) One (1) natural gas fired air makeup unit, identified as AMU3, constructed in 2000, with a heat input rate of 1.25 million British thermal units (MMBtu) per hour, using no controls, and exhausting to Stack 8. Stack is 24' high with a diameter of 8".
- (c) One (1) natural gas fired air makeup unit, identified as AMU4, constructed in 2000, with a heat input rate of 0.2 million British thermal units (MMBtu) per hour, using no controls, and exhausting to stack 9. Stack is 24' high with a diameter of 8".
- (d) Two (2) natural gas fired radiant heaters, identified as RH1 and RH2, constructed in 2000, each with a heat input rate of 0.4 million British thermal units (MMBtu) per hour, using no controls, and exhausting to stacks 10 and stack 11. Stacks are 24' high with a 4" diameter.

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

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, 326 IAC 8-1-6, 326 IAC 2-8-4, 326 IAC 6-2-4

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, HAP, Weekly stack overspray observations, daily filter checks and monthly rooftop and ground overspray inspections		
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Observations and Comments:

Upon arrival at Topeka Graphics, Inc., the plant was closed. A person on the property stated that the plant was closed for the week and would be operating again the following week.

Emission Unit or Control Device	Parameter	Permitted Value/Range	Observation
Dry filter	Overspray	Normal	Did not observe. Attempted

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 E.1		
Emission Units and Control Devices:		
Emissions Unit Description:		
<p>(a) One (1) spray booth, identified as SB1, constructed in 2000, utilizing HVLP spray application, using fabric filters, identified as PF1, as particulate control, exhausting to stack 1 (S1) and stack 2 (S2), and equipped with 4 spray guns (SG1 through SG4), with a total maximum capacity of 0.68 vehicles per hour.</p> <p>Under 40 CFR Part 63, Subpart HHHHHH, spray booth SB1 is considered an affected facility.</p>		
<p>(b) One (1) spray booth, identified as SB2, constructed in 2000, utilizing HVLP spray application, using fabric filters, identified as PF2, as particulate control, exhausting to stack 3 (S3) and stack 4 (S4), and equipped with 4 spray guns (SG5 through SG8), with a total maximum capacity of 0.68 vehicles per hour.</p> <p>Under 40 CFR Part 63, Subpart HHHHHH, spray booth SB2 is considered an affected facility.</p>		
<p>(c) One (1) spray booth, identified as SB3, constructed in 2000, utilizing HVLP spray application, using fabric filters, identified as PF3, as particulate control, exhausting to stack 5 (S5), and equipped with 1 spray gun (SG9), with a maximum capacity of 2.33 parts per hour.</p> <p>Under 40 CFR Part 63, Subpart HHHHHH, spray booth SB3 is considered an affected facility.</p>		
<p>(d) One (1) touch up spray gun, identified as SG10, constructed in 2000, utilizing HVLP spray application, with a maximum capacity of 0.17 vehicles per hour, using no controls, and exhausting indoors.</p> <p>Under 40 CFR Part 63, Subpart HHHHHH, spray gun SG10 is considered an affected facility..</p> <p>(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)</p>		
Pollutants with Emission Limits or Applicable Standards:		
<input type="checkbox"/> SO ₂ <input type="checkbox"/> NO _x <input type="checkbox"/> CO <input type="checkbox"/> VOC <input type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input checked="" type="checkbox"/> HAPS		
Applicable Rule:		
40 CFR Part 63, Subpart HHHHHH		
Applicability Information:		
Topeka Graphics, Inc. is an existing affected source because they are an area source of HAPs, they perform spray application of coatings to motor vehicles, and they constructed prior to September 17, 2007.		
Compliance date: January 10, 2011		
Requirement:	Applicable	Violation Noted
Emission Limitations/Standards	<input type="checkbox"/> Yes <input checked="" 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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Compliance Monitoring Requirements	<input type="checkbox"/> Yes <input checked="" 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
Record Keeping Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Types of Records Reviewed: Initial and refresher training certifications, Spray booth filter efficiency documentation, documentation that spray guns meet transfer efficiency of HVLP if HVLP not used, notifications, deviations		
Reporting Requirements	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" 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
Observations and Comments:		
Upon arrival at Topeka Graphics, Inc., the plant was closed. A person on the property stated that the plant was closed for the week and would be operating again the following week.		

PERMIT SECTION E.1			
Emission Unit or Control Device	Parameter	Permitted Value/Range	Observation
Dry filters	N/A	N/A	Not observed. Attempted
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 checked="" type="checkbox"/> Annual Compliance Certification(s) <input type="checkbox"/> Annual Notification(s)	<input checked="" type="checkbox"/> Deviation & Compliance Monitoring Report(s) <input type="checkbox"/> Emission Statement(s)
The reports are consistent with inspection observations.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
The permit accurately represents emission units observed on site.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Compliance assistance was provided during the inspection.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" 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:	
Upon arrival at Topeka Graphics, Inc., the plant was closed. A person on the property stated that the plant was closed for the week and would be operating again the following week.	
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	None. Inspection was attempted. Another attempt to inspect will be made at a later date.

ATTACHMENTS
<ul style="list-style-type: none"> None