



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant

DATE: December 16, 2013

RE: SpaceGuard Products / 071-33887-00020

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FN-REGIS.dot 6/13/2013



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REGISTRATION OFFICE OF AIR QUALITY

**SpaceGuard Products
711 S Commerce Dr
Seymour, IN 47274-4023**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. R 071-33887-00020	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 16, 2013

SECTION A

SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary steel wire enclosures production plant.

Source Address:	711 S Commerce Dr, Seymour, IN 47274-4023
General Source Phone Number:	(317) 392-8344
SIC Code:	3496 (Miscellaneous Fabricated Wire Products)
County Location:	Jackson County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) powder coating booth, identified as EU01, constructed in 2000, equipped with eight (8) coating applicators, with a maximum capacity of 12 pounds of coating per hour, using dry filters for particulate control, and exhausting to stack S01.
- (b) One (1) natural gas-fired curing oven, identified as EU02, constructed in 2000, with a maximum heat input rate of 0.29 MMBtu/hr.
- (c) One (1) natural gas-fired Johnson air handler, constructed in 2000, with a maximum heat input rate of 0.80 MMBtu/hr.
- (d) One (1) natural gas-fired August air handler and heater, constructed in 2000, with a maximum heat input rate of 1.29 MMBtu/hr.
- (e) Three (3) MIG welding stations, identified as EU03, each with a maximum capacity of 1.10 pounds per hour.
- (f) One (1) packaging and shipping area.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this registration shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No. R 071-33887-00020 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue

MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251

- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

B.8 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific conditions in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The Registrant shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Registrant to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Registrant is required by 40 CFR Part 60 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this registration:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

Testing Requirements [326 IAC 2-5.1-3(e)(2)]

C.3 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this registration, a test protocol, except as provided elsewhere in this registration, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date.

- (b) The Registrant shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Registrant submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)]

C.4 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this registration, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Registrant may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Registrant can demonstrate that an alternative instrument specification will adequately ensure compliance with registration conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.5 Response to Excursions or Exceedances [326 IAC 2-5.1-3(e)(2)]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this registration:

- (a) The Registrant shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Registrant has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the registration.
- (e) The Registrant shall record the reasonable response steps taken.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)]

C.6 General Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)]

- (a) Records of all required monitoring data, reports and support information required by this registration shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Registrant, the Registrant shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this registration, for all record keeping requirements not already legally required, the Registrant shall be allowed up to ninety (90) days from the date of registration issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.7 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-5.1-3(e)(2)] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this registration shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this registration, any notice, report, or other submission required by this registration shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this registration or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this registration. For the purpose of this registration, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1

OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) One (1) powder coating booth, identified as EU01, constructed in 2000, equipped with eight (8) coating applicators, with a maximum capacity of 12 pounds of coating per hour, using dry filters for particulate control, and exhausting to stack S01.
- (b) One (1) natural gas-fired curing oven, identified as EU02, constructed in 2000, with a maximum heat input rate of 0.29 MMBtu/hr.
- (c) One (1) natural gas-fired Johnson air handler, constructed in 2000, with a maximum heat input rate of 0.80 MMBtu/hr.
- (d) One (1) natural gas-fired August air handler and heater, constructed in 2000, with a maximum heat input rate of 1.29 MMBtu/hr.
- (e) Three (3) MIG welding stations, identified as EU03, each with a maximum capacity of 1.10 pounds per hour.
- (f) One (1) packaging and shipping area.

(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 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the powder coating booth EU01 shall not exceed 0.13 pounds per hour when operating at a process weight rate of 12 pounds per hour.

The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this facility and its control device. Section B - Preventive Maintenance Plan contains the Registrant's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.3 Particulate Control

In order to comply with Condition D.1.1, the dry filters for particulate control shall be in operation and control emissions from powder coating booth EU01 at all times that this facility is in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

**REGISTRATION
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	SpaceGuard Products
Address:	711 S Commerce Dr
City:	Seymour, IN 47274-4023
Phone Number:	(317) 392-8344
Registration No.:	R 071 - 33887 - 00020

I hereby certify that SpaceGuard Products is : still in operation.
 no longer in operation.

I hereby certify that SpaceGuard Products is : in compliance with the requirements
of Registration No. R 071 - 33887 - 00020.
 not in compliance with the requirements
of Registration No. R 071 - 33887 - 00020

Authorized Individual (typed):
Title:
Signature:
Phone Number:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Description and Location

Source Name: SpaceGuard Products
Source Location: 711 S Commerce Dr, Seymour, IN 47274-4023
County: Jackson
SIC Code: 3496 (Miscellaneous Fabricated Wire Products)
Registration No.: R 071 - 33887 - 00020
Permit Reviewer: Renee Traivaranon

On November 15, 2013, the Office of Air Quality (OAQ) received an application from SpaceGuard Products requesting a registration for an operation of an existing stationary steel wire enclosures production plant.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Jackson County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective December 29, 2005, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Jackson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Jackson County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore,

direct PM_{2.5}, SO₂, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants

Jackson County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-5.1-2 (Registration) applicability.

Unregistered Emission Units and Pollution Control Equipment

The source consists of the following unregistered emission units:

- (a) One (1) powder coating booth, identified as EU01, constructed in 2000, equipped with eight (8) coating applicators, with a maximum capacity of 12 pounds of coating per hour, using dry filters for particulate control, and exhausting to stack S01.
- (b) One (1) natural gas-fired curing oven, identified as EU02, constructed in 2000, with a maximum heat input rate of 0.29 MMBtu/hr.
- (c) One (1) natural gas-fired Johnson air handler, constructed in 2000, with a maximum heat input rate of 0.80 MMBtu/hr.
- (d) One (1) natural gas-fired August air handler and heater, constructed in 2000, with a maximum heat input rate of 1.29 MMBtu/hr.
- (e) Three (3) MIG welding stations, identified as EU03, each with a maximum capacity of 1.10 pounds per hour.
- (f) One (1) packaging and shipping area.

Enforcement Issues

IDEM is aware that equipment has been constructed and operated prior to obtaining a registration. IDEM is reviewing this matter and will take the appropriate action. This approval is intended to satisfy the requirements of the registration rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Registration

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)									
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Powder Coating (EU01)	18.19	18.19	18.19	0.00	0.00	0.00	0.00	0.00	-	0.00
Natural Gas Combustion	0.02	0.07	0.07	0.01	0.98	0.05	0.83	1186.17	0.02	0.02
Welding	0.08	0.08	0.08	0.00	0.00	0.00	0.00	0.00	0.05	0.05 (Mn)
Total PTE of Entire Source	18.28	18.34	18.34	0.01	0.98	0.05	0.83	1,186.17	0.07	0.05 (Mn)
Registration Levels	< 25	< 25	< 25	< 25	< 25	< 25	< 100	< 100,000	< 25	< 10

negl. = negligible
 *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".
 **The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

Criteria Pollutants (PM10, PM2.5, SO2, NOx, VOC, and CO)

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM, PM10 and PM2.5 are within the ranges listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued.

Hazardous Air Pollutants

- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Greenhouse Gases (GHGs) as CO₂e

- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the registration.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63.3880, Subpart MMMM (4M)) are not included for this source, because this source does not use coatings that contain hazardous air pollutants (HAP) in the surface coating of metal wires, and this source is not a major source for HAPs.

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Metal Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included in the permit, since the facility's manufacturing process does not meet the criteria as described in the applicability section of Subpart HHHHHH. The source does not perform any metal stripping operations; the source does not perform autobody refinishing operations; and the source does not perform a spray application of coatings containing compounds of chromium, lead, manganese, nickel, or cadmium. Therefore, the requirements of 40 CFR Part 63, Subpart HHHHHH do not apply.
- (d) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the registration.

Compliance Assurance Monitoring (CAM)

- (e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the registration, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-5.1-2 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this registration:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.
- (g) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (h) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Powder coating operation

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the powder coating booth (EU01) shall not exceed 0.13 pounds per hour when operating at a process weight rate of 12 pounds per hour. The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filter shall be in operation at all times the powder coating booth is in operation, in order to comply with this limit.

- (b) 326 IAC 8 (VOC Rules)
The powder coating booth is not subject to the requirements of 326 IAC 8, since there is no VOC emissions from this operation.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on November 15, 2013.

The construction and operation of this source shall be subject to the conditions of the attached proposed Registration No. 071 - 33887 - 00020. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

- (a) Questions regarding this proposed registration can be directed to Ms. Renee Traivaranon at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5615 or toll free at 1-800-451-6027 extension 4-5615.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem

**Emission Calculations
Summary**

Company Name: SpaceGuard Products
Address City IN Zip: 711 S Commerce Dr, Seymour, IN 47274-4023
Permit Number: 071 - 33887 - 00020
Plt ID: 071 - 00020
Reviewer: Renee Traivaranon
Date: December 4, 2013

Potential To Emit (tons/yr)											
Emission Unit ID	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	GHG	Single HAP		Total HAPs
Powder Coating (EU01)	18.19	18.19	18.19	0.00	0.00	0.00	0.00	0.00	0.00	-	-
Natural Gas Combustion	0.02	0.07	0.07	0.01	0.98	0.05	0.83	1186.17	0.02	Hexane	0.02
Welding	0.08	0.08	0.08	0.00	0.00	0.00	0.00	0.00	0.05	Mn	0.05
TOTALS	18.28	18.34	18.34	0.01	0.98	0.05	0.83	1,186.17	0.05	Mn	0.07

**Emissions Calculations
Powder Coating Booth**

Company Name: SpaceGuard Products
Address City IN Zip: 711 S Commerce Dr, Seymour, IN 47274-4023
Permit Number: 071 - 33887 - 00020
Plt ID: 071 - 00020
Reviewer: Renee Traivaranon
Date: December 4, 2013

Material	Pounds of materials (lbs/unit)	Maximum (Units/hour)	Maximum Usage (lbs/hr)	PTE PM (lbs/hr)	PTE PM (tons/yr)	PTE PM10 (tons/yr)	PTE PM2.5 (tons/yr)	Transfer Efficiency (%)	Controlled Efficiency (%)
SpaceGuard Grey	0.94	12.62	11.86	4.15	18.19	18.19	18.19	65.0%	97.0%

METHODOLOGY

Assumption PM = PM10 = PM2.5
 Powder coating formulations do not contain VOC

Potential PM Tons per Year = Particulate Potential (lbs/hr) * (8760 hr/yr) * (1 ton/2000 lbs)*(1-Transfer efficiency)
 Potential PM10 Tons per Year = Particulate Potential (lbs/hr) * (8760 hr/yr) * (1 ton/2000 lbs)*(1-Transfer efficiency)
 Potential PM2.5 Tons per Year = Particulate Potential (lbs/hr) * (8760 hr/yr) * (1 ton/2000 lbs)*(1-Transfer efficiency)

Maximum Process (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)	Controlled Emissions (lbs/hr)
12	0.01	0.13	0.12

Methodology

Allowable Emissions = 4.10(Process Weight Rate)^0.67

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Company Name: SpaceGuard Products
 Address City IN Zip: 711 S Commerce Dr, Seymour, IN 47274-4023
 Permit Number: 071 - 33887 - 00020
 Plt ID: 071 - 00020
 Reviewer: Renee Traivaranon
 Date: December 4, 2013

Emission Unit	Maximum Heat (MMBtu/hr)	HHV	Potential Throughput
Johnson Air Handler	1.20	mmBtu	MMCF/yr 19.6
August Air Handler & Htr	0.80	mmBtu	
Curing Oven	0.29	mmscf	
	2.29	1020	

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.02	0.07	0.07	0.01	0.98	0.05	0.83

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 PM2.5 emission factor is filterable and condensable PM2.5 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	2.063E-05	1.179E-05	7.369E-04	1.768E-02	3.340E-05	1.849E-02

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.912E-06	1.081E-05	1.375E-05	3.733E-06	2.063E-05	5.384E-05
					Total HAPs	1.854E-02
					Worst HAP	1.768E-02

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Greenhouse Gas Calculations

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	1,179	0.0	0.0
Summed Potential Emissions in tons/yr	1,179		
CO2e Total in tons/yr	1,186		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Emissions Calculations
Welding Operations**

Company Name: SpaceGuard Products
Address City IN Zip: 711 S Commerce Dr, Seymour, IN 47274-4023
Permit Number: 071 - 33887 - 00020
Plt ID: 071 - 00020
Reviewer: Renee Traivaranon
Date: December 4, 2013

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Submerged Arc	0	0		0	0			0.000	0.000	0.000	0	0.000
Metal Inert Gas (MIG)(Steel)(KC-28)	3	1.1		0.0052	0.0032	0.00001	0.00001	0.017	0.011	0.000	0.000033	0.011
Stick (E7018 electrode)	0	0		0	0			0.000	0.000	0.000	0	0.000
Tungsten Inert Gas (TIG)(Steel)	0	20.73		0.0052	0.0032	0.00001	0.00001	0.000	0.000	0.000	0	0.000
Oxyacetylene(carbon steel)	0			0	0			0.000	0.000	0.000	0	0.000
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	0	2	15	0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000
Oxymethane	0			0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma** (see separate calculation sheet)	0	0.375	150	0.0039				0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.02	0.01	0.00	0.00	0.01
Potential Emissions lbs/day								0.41	0.25	0.00	0.00	0.26
Potential Emissions tons/year								0.08	0.05	0.00	0.00	0.05

Methodology:

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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TO: Hauris Lewis
SpaceGuard Products
711 South Commerce Drive
Seymour, IN 47274-4023

DATE: December 16, 2013

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Registration
071-33887-00020

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Jim Dodson, Cornerstone Environmental
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

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1		Hauris Lewis Spaceguard Products 711 S Commerce Dr Seymour IN 47274-4023 (Source CAATS)		Confirmed Delivery								
2		Jackson County Commissioner Jackson County Courthouse Brownstown IN 47220 (Local Official)										
3		Mr. Tome Earnhart 3960 N. CR 300 W. North Vernon IN 47265 (Affected Party)										
4		Seymour City Council and Mayors Office 301 North Chestnut Street Seymour IN 47274 (Local Official)										
5		Jackson County Health Department 801 West 2nd Street Seymour IN 47274-2711 (Health Department)										
6		Mr. Jim Dodson Cornerstone Environmental 880 Lennox Ct Zionsville IN 46077 (Consultant)										
7		JVB Investments LP 1444 Horn Street Clarksville IN 47129 (Affected Party)										
8		Viren Inc. 220 Commerce Drive Seymour IN 47274 (Affected Party)										
9		Competition Properties, LLC 2600 Montgomery Drive Seymour IN 47274 (Affected Party)										
10		Thomas J & Karen S Allman 4904 N US Highway 31 Seymour IN 47274 (Affected Party)										
11		Imogene S Trimpe 4200 S Cloverleaf Drive Seymour IN 47274 (Affected Party)										
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