



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

Date: November 20, 2014

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

Source Name: Reelcraft Industries

Permit Level: Registration - Administrative Amendment

Permit Number: 183 - 35027 - 00047

Source Location: 2842 E Business Hwy 30, Columbia City, IN,

Type of Action Taken: Revisions to permit requirements
Changes that are administrative in nature

Notice of Decision: Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 35027.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

(continues on next page)

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 from 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.



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November 20, 2014

Donald Taylor, Sustainability Manager
Reelcraft Industries, Inc.
2842 E. Business Hwy 30
Columbia City, IN 46725

Re: 183-35027-00047
Administrative Amendment to
R183-32855-00047

Dear Mr. Taylor:

Reelcraft Industries, Inc. was issued a Registration No. R183-32855-00047 on May 10, 2013 for a stationary source for the manufacture of industrial and commercial hose reels located at 2842 E. Business Hwy 30, Columbia City, IN 46725. On October 9, 2014, the Office of Air Quality (OAQ) received an application from the source requesting to remove the applicability requirement of 40 CFR 63, Subpart XXXXXX (National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories).

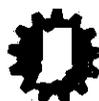
The source is engaged in the manufacture of fabricated metal products under SIC 3499. Based on this code, IDEM determined that this source is subject to 40 CFR 63, Subpart XXXXXX (National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories) for its welding operations. However, according to US EPA documentation, the SIC 3499 corresponds to the NAICS numbers 332117, (Powder Metallurgy Part Manufacturing) and 332999, (All Other Miscellaneous Fabricated Metal Product Manufacturing) and this combination of codes is what make the source subject to this specific NESHAP.

Reelcraft Industries states that neither of those NAICS categories represents the majority of the work done at the facility. Reelcraft's primary activity (70% to 75%) is pressing and stamping sheet metal to form various parts for commercial and industrial hose reels. The finished reels are then assembled from these various parts. NAICS 332119, which includes establishments primarily engaged in "metal stampings (except automotive, cans and coins), unfinished, manufacturing," is representative of the work done at the facility.

The SIC and the NAICS code combination of 3499 and 332119 used by this source to describe their primary activity is not one of the combinations specifically listed in US EPA documentation.¹ IDEM concurs that this facility is not subject to 40 CFR 63, Subpart XXXXXX (National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories) and will amend the current registration accordingly.

Pursuant to 326 IAC 2-5.5-6(d)(5), this change to the registration is considered an administrative amendment because the registration is amended to incorporate or delete applicable requirements as a result of a change in applicability and there is no new equipment and no change to the operations or processes.

¹ US EPA Document: *Nine Metal Fabrication and Finishing Area Source Categories, (40 CFR Part 63, Subpart 6X) Questions & Answers, November, 2011*



Pursuant to 326 IAC 2-5.5-6, the registration is hereby amended as follows, with deleted language as ~~strikeouts~~ and new language **bolded**:

Change 1:

The following statement has been removed from the A.2 section of the permit:

~~Under 40 CFR 63, Subpart XXXXXX, this unit is considered an affected source/facility.~~

Change 2:

The entire Section E.1 has been removed from the permit:

SECTION E.1 OPERATION CONDITIONS

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

~~(h) One (1) miller hand welder, identified as MW-1, constructed in 1992, with a maximum capacity of 12.30 lb/hr and exhausting indoors.~~

~~Under 40 CFR 63, Subpart XXXXXX, this unit is considered an affected source/facility.~~

~~(i) One (1) miller hand welder, identified as MW-2, constructed in 1982, with a maximum capacity of 12.30 lb/hr and exhausting indoors.~~

~~Under 40 CFR 63, Subpart XXXXXX, this unit is considered an affected source/facility.~~

~~(j) Three (3) Lincoln electric hand welds, identified as MW-3-5, constructed in 1982, with a maximum capacity of 12.30 lb/hr each and exhausting indoors.~~

~~Under 40 CFR 63, Subpart XXXXXX, this unit is considered an affected source/facility.~~

~~(k) One (1) Lincoln electric TIG weld, identified as MW-6, constructed in 1982, with a maximum capacity of 5.60 lb/hr and exhausting indoors.~~

~~Under 40 CFR 63, Subpart XXXXXX, this unit is considered an affected source/facility.~~

~~(l) One (1) stick weld for maintenance, identified as MW-7, constructed in 1988, with a maximum capacity of 10.00 lb/hr and exhausting indoors.~~

~~Under 40 CFR 63, Subpart XXXXXX, this unit is considered an affected source/facility.~~

~~(m) One (1) miller robotic welders, identified as RW-1, constructed in 2002, with a maximum capacity of 12.30 lb/hr and exhausting indoors.~~

~~Under 40 CFR 63, Subpart XXXXXX, this unit is considered an affected source/facility.~~

~~(n) One (1) Lincoln robotic welder, identified as RW-2, constructed in 2013, with a maximum capacity of 12.30 lb/hr and exhausting indoors.~~

~~Under 40 CFR 63, Subpart XXXXXX, this unit is considered an affected source/facility.~~

~~(o) One (1) spot welder, identified as SW-1, constructed in 1982, with a maximum capacity of 12.30 lb/hr and exhausting indoors.~~

~~Under 40 CFR 63, Subpart XXXXXX, this unit is considered an affected source/facility.~~

~~(p) One (1) spot welder, identified as SW-2, constructed in 1988, with a maximum capacity of 12.30 lb/hr and exhausting indoors.~~

~~Under 40 CFR 63, Subpart XXXXXX, this unit is considered an affected source/facility.~~

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

~~E.1.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR 63, Subpart A]~~

~~(a) Pursuant to 40 CFR 63.1, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, except as otherwise specified in 40 CFR 63, Subpart XXXXXX.~~

~~(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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~~

~~and~~

~~United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590~~

~~E.1.2 National Emission Standards for Hazardous Air Pollutants (NESHAP): Area Source Standards for Nine Metal Fabrication and Finishing Source Categories [40 CFR Part 63, Subpart XXXXXX]~~

~~The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart XXXXXX (included as Attachment A of this permit), except as otherwise specified in 40 CFR Part 63, Subpart XXXXXX:~~

- ~~(1) 40 CFR 63.11514 (a)(2),(b)(5),(c)~~
- ~~(2) 40 CFR 63.11515 (a)~~
- ~~(3) 40 CFR 63.11516 (f)(1)(2)(3)(4)(5)(6)(7)(8)~~
- ~~(4) 40 CFR 63.11517 (c),(d)~~
- ~~(5) 40 CFR 63.11519 (a),(b)(1)(2)(4)(8)(9),(c)(1)(12)(13)(15)~~
- ~~(6) 40 CFR 63.11521~~
- ~~(7) 40 CFR 63.11522~~
- ~~(8) 40 CFR 63.11523~~

The source shall continue to operate according to 326 IAC 2-5.5 (Registrations). All other conditions of the registration shall remain unchanged and in effect. Please find attached the entire registration as amended.

Previously issued approvals for this source are available on the Internet at:
<http://www.in.gov/ai/appfiles/idem-caats/>.

A copy of the registration is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Deborah Cole at (800) 451-6027, ext. 4-5377, or dial (317) 234-5377.

Sincerely,



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

IC/dac

Attachment: Amended Registration

cc: File - Whitley County
Whitley County Health Department
Compliance and Enforcement Branch



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REGISTRATION OFFICE OF AIR QUALITY

Reelcraft Industries, Inc.
2842 E Business Hwy 30
Columbia City, IN, 46725

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. 183-32855-00047	
Issued by: <i>Original Signed by:</i> Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 10, 2013
Administrative Amendment No. 183-35027-00047	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 20, 2014

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 source that manufactures industrial and commercial hose reels.

Source Address:	2842 E Business Hwy 30, Columbia City, IN, 46725
General Source Phone Number:	260-244-2026
SIC Code:	3469 (Metal Stampings), 3499 (Fabricated Metal Products), 3479 (Metal Coating and Allied Services)
County Location:	Whitley 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) automatic powder coating booth, identified as PCB-1 Automatic Booth (Electrostatic), constructed in 1989, coating a maximum of 4000 units/hr and 30 lbs of powder per hour, and using a filter as control and exhausting indoors.
- (b) One (1) manual powder coating booth, identified as PCB-2 Manual Booth (Electrostatic), constructed in 1989, coating a maximum of 4000 units/hr and 30 lbs of powder per hour, using a filter as control and exhausting indoors.
- (c) One (1) offline manual powder coating booth, identified as PCB-3 Off line Manual Booth (Electrostatic), approved for construction in 2013, coating a maximum of 100.00 units/hr and 30 lbs of powder per hour, using a filter as control and exhausting indoors.
- (d) One (1) stage 1 wash burner, identified as CU-1, constructed in 1988, with a maximum capacity of 2.50 MMBtu/hr and exhausting to stacks STK-1A&B.
- (e) One (1) dry off oven burner, identified as CU-2, constructed in 1988, with a maximum capacity of 2.50 MMBtu/hr and exhausting to stacks STK-2A, B, C.
- (f) One (1) powder paint bake oven, identified as CU-3, constructed in 1988, with a maximum capacity of 3.00 MMBtu/hr and exhausting to stacks STK-3A&B.
- (g) One (1) burn off oven, identified as CU-4, constructed in 1988, with a maximum capacity of 0.78 MMBtu/hr and exhausting to stack STK-4.
- (h) One (1) miller hand welder, identified as MW-1, constructed in 1992, with a maximum capacity of 12.30 lb/hr and exhausting indoors.
- (i) One (1) miller hand welder, identified as MW-2, constructed in 1982, with a maximum capacity of 12.30 lb/hr and exhausting indoors.
- (j) Three (3) Lincoln electric hand welds, identified as MW-3-5, constructed in 1982, with a maximum capacity of 12.30 lb/hr each and exhausting indoors.

- (k) One (1) Lincoln electric TIG weld, identified as MW-6, constructed in 1982, with a maximum capacity of 5.60 lb/hr and exhausting indoors.
- (l) One (1) stick weld for maintenance, identified as MW-7, constructed in 1988, with a maximum capacity of 10.00 lb/hr and exhausting indoors.
- (m) One (1) miller robotic welders, identified as RW-1, constructed in 2002, with a maximum capacity of 12.30 lb/hr and exhausting indoors.
- (n) One (1) Lincoln robotic welder, identified as RW-2, constructed in 2013, with a maximum capacity of 12.30 lb/hr and exhausting indoors.
- (o) One (1) spot welder, identified as SW-1, constructed in 1982, with a maximum capacity of 12.30 lb/hr and exhausting indoors.
- (p) One (1) spot welder, identified as SW-2, constructed in 1988, with a maximum capacity of 12.30 lb/hr and exhausting indoors.
- (q) One (1) plasma cutter for scrap recovery , identified as PC-1, constructed in 2002, with a maximum capacity of 15.00 in/min and exhausting indoors.
- (r) One (1) pretreatment wash tank, constructed in 1989, used prior to the powder coating process, using non-VOC and non-HAP containing solvents. There are no emissions from this process.
- (s) One (1) surface grinding operation, including one (1) sanding tent, one (1) saw, one (1) turret press and one (1) large frame saw, with a maximum capacity of 625 lbs/hr, utilizing no control and exhausting inside.
- (t) Twenty Six (26) Space Heating Units, with a total of 3.15 MMBtu/hr.

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. 183-32855-00047 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 condition(s) 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) automatic powder coating booth, identified as PCB-1 Automatic Booth (Electrostatic), constructed in 1989, coating a maximum of 4000 units/hr and 30 lbs of powder per hour, and using a filter as control and exhausting indoors.
- (b) One (1) manual powder coating booth, identified as PCB-2 Manual Booth (Electrostatic), constructed in 1989, coating a maximum of 4000 units/hr and 30 lbs of powder per hour, using a filter as control and exhausting indoors.
- (c) One (1) offline manual powder coating booth, identified as PCB-3 Off line Manual Booth (Electrostatic), approved for construction in 2013, coating a maximum of 100.00 units/hr and 30 lbs of powder per hour, using a filter as control and exhausting indoors.

(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 Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from each unit shall not exceed the following pound per hour limit listed in the table below:

Emission Unit	Process Weight Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable PM Emission Rate (lb/hr)
PCB-1 Automatic Booth (Electrostatic)	30	0.015	0.25
PCB-2 Manual Booth (Electrostatic)	30	0.015	0.25
PCB-3 Off line Manual Booth (Electrostatic)	30	0.015	0.25

These limits were calculated from 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 these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee'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

- (a) In order to comply with condition D.1.1, the filters for particulate control shall be in operation and control emissions from the paint booths, identified as PCB-1 Automatic Booth, PCB-2 Manual Booth, at all times that these units are 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:	Reelcraft Industries, Inc.
Address:	2842 E Business Hwy 30
City:	Columbia City, IN, 46725
Phone Number:	260-244-2026
Registration No.:	183-32855-00047

I hereby certify that Reelcraft Industries, Inc. is:

still in operation.

I hereby certify that Reelcraft Industries, Inc. is:

no longer in operation.

in compliance with the requirements of Registration No. 183-32855-00047.

not in compliance with the requirements of Registration No. 183-32855-00047.

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

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Donald Taylor
Reelcraft Industries
2842 E Business Hwy 30
Columbia City, IN 46725

DATE: November 20, 2014

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

SUBJECT: Final Decision
Registration - Administrative Amendment
183 - 35027 - 00047

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:
Ed Walter, Engineering Manager
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

IDEM Staff	LPOGOST 11/20/2014 Reelcraft Industries, Inc. 183 - 35027 - 00047 final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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1		Donald Taylor Reelcraft Industries, Inc. 2842 E Business Hwy 30 Columbia City IN 46725 (Source CAATS) Via confirmed delivery										
2		Ed Walter Engineering Manager Reelcraft Industries, Inc. 2842 E Business Hwy 30 Columbia City IN 46725 (RO CAATS)										
3		Mr. Janel Rogers 2050 E Linker Rd Columbia City IN 46725 (Affected Party)										
4		Mr. Nondus Carr 1760 South 500 East Columbia City IN 46725 (Affected Party)										
5		Mr. Thomas E. Delaney 2640 East 400 Columbia City IN 46725 (Affected Party)										
6		Mr. Robert F. Taylor 7856 S 800 E-92 Fort Wayne IN 46814 (Affected Party)										
7		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
8		Whitley County Commissioners 220 West Van Buren Street Suite 207 Columbia City IN 46725 (Local Official)										
9		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)										
10		Gene Donaghy Northeastern REMC 4901 E. Park 30 Drive Columbia City IN 46725-8790 (Affected Party)										
11		Mr. Lynn Weirick 3954 E Old Trail Rd Columbia City IN 46725 (Affected Party)										
12		Whitley County Health Department 220 West Van Buren Steetr Suite 111 Columbia City IN 46725-2056 (Health Department)										
13		Ms. Camille Amiri News Channel 15 2915 W State Blvd Fort Wayne IN 46808 (Affected Party)										
14		Charles Acheson 4655 S. 700 East Columbia City IN 46725 (Affected Party)										
15		Michael Gayle 1315 S. 500 East Columbia City IN 46725 (Affected Party)										

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