



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

October 14, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: General Cable Industries, Inc. / 053-14834-00001

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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 13-15-5-3, this permit 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.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require 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, Room 1049, 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
FNPER.dot 9/16/03



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) Renewal OFFICE OF AIR QUALITY

**General Cable Industries, Inc.
440 East 8th Street
Marion, Indiana 46953**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F053-14834-00001	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 14, 2004 Expiration Date: October 14, 2009

SECTION A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
A.5	Prior Permit Conditions	
SECTION B	GENERAL CONDITIONS	8
B.1	Permit No Defense [IC 13]	
B.2	Definitions [326 IAC 2-8-1]	
B.3	Permit Term [326 IAC 2-8-4(2)]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.11	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.12	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]	
B.13	Emergency Provisions [326 IAC 2-8-12]	
B.14	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.15	Permit Modification, Reopening, Revocation and Reissuance, or Termination	
B.16	Permit Renewal [326 IAC 2-8-3(h)]	
B.17	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.18	Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]	
B.19	Permit Revision Requirement [326 IAC 2-8-11.1]	
B.20	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC13-30-3-1] [13-17-3-2]	
B.21	Transfer of Ownership or Operation [326 IAC 2-8-10]	
B.22	Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
SECTION C	SOURCE OPERATION CONDITIONS	17
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Particulate Emission Limitations For Manufacturing Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1][IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Operation of Equipment [326 IAC 2-8-5(a)(4)]	
C.8	Stack Height [326 IAC 1-7]	
C.9	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.10	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.11	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]	
C.12	Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]	
C.13	Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]	
C.14	Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]	

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS

Two natural gas/No. 2 oil fired boilers 23

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 Particulate [326 IAC 6-2-3]
- D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 7-2-1]
- D.1.3 Fuel Usage Limitation [326 IAC 2-8-4]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.5 Sulfur Dioxide Emissions and Sulfur Content

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.1.6 Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.7 Record Keeping Requirements
- D.1.8 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS

Manufacturing Operations 26

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.2.1 Particulate [326 IAC 6-3-2]
- D.2.2 FESOP PM10 limit [326 IAC 2-8-4]
- D.2.3 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8]
- D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.2.5 Volatile Organic Compounds (VOC)

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.2.6 Visible Emissions Notations
- D.2.7 Parametric Monitoring
- D.2.8 Baghouse Inspections
- D.2.9 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.2.10 Record Keeping Requirements
- D.2.11 Reporting Requirements

Certification Form	31
Emergency Occurrence Form	32
Natural Gas Fired Boiler Certification	34
Quarterly Report Form	35-37
Quarterly Deviation anCompliance Monitoring Report Form	38

SECTION A SOURCE SUMMARY

This permit 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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee 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 Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary cable manufacturing plant.

Authorized individual:	Plant Manager
Source Address:	440 East 8 th Street, Marion, Indiana 46953
Mailing Address:	440 East 8 th Street, Marion, Indiana 46953
General Source Phone:	(765) 664 2321
SIC Code:	3357, 3087, 3356, 3471, 3499
Source Location Status:	Grant
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) natural gas fired boiler (ID# 1) using no. 2 fuel oil as a back-up, with a maximum heat input capacity of 48.0 million Btu per hour, constructed in 1952 and exhausting through stack SS-1.
- (b) One (1) natural gas fired boiler (ID# 2) using no. 2 fuel oil as a back-up, with a maximum heat input capacity of 42.0 million Btu per hour, constructed in 1942 and exhausts through stack SS-2.
- (c) One (1) North Lead line (ID# 5) with a maximum capacity of 3.3 tons per hour, with particulate emissions controlled by a baghouse (ID # SS-9), and exhausting through stack SS-9. This lead line is equipped with an organic solvent wash pot, and adhesive application pot, a lead pot, a dross pot, two (2) rubber extruders, and a lead press extruder. Both the organic solvent wash pot and the adhesive application pot exhaust through stack SS-50 (constructed in 1967).
- (d) One (1) South Lead Line (ID# 6) with a maximum capacity of 2.1 tons per hour of lead, not controlled by any control devices, and exhausting through stacks SS-8 and SS-50. This lead line is equipped with an organic solvent wash pot, and adhesive application pot, a lead pot, a dross pot, and rubber extruder, and a lead press extruder (constructed in 1967).
- (e) One (1) lead stripper operation (ID# 8) with a maximum capacity of 18.0 tons per hour of lead, with particulate emissions controlled by two baghouses (ID#s SS-51A and SS-51B), constructed in 1986 and exhausting through a common stack SS-51 (constructed in 1986). There is also one (1) associated solvent wash pot exhausting through stack ID# SS-52.

- (f) No. 8 Rewind and Unshield Lines with maximum solvent usage of 15.5 tons per year and consisting of following (constructed in 1967):
 - (1) No. 8 Rewind Line (ID# 9a) which exhausts through stack SS-64. This line is equipped with three (3) organic solvent wash pots;
 - (2) Unshield Line (ID# 9b) which exhausts through stack SS-65. This line is equipped with an organic solvent wash pot.
- (g) Stranding Lines, CAT CV, and Continuous Vulcanization (CV) Lines with maximum solvent usage of 6.3 tons per year and consisting of following (constructed in 1967):
 - (1) Stranding Lines which exhaust through general ventilation GV;
 - (2) No. 1, 2, and 3 CAT CV Lines (ID#s CV-1, CV-2 and CV-3 (constructed in 1997)) which exhaust through general ventilation (GV). Each of these lines is equipped with an insulation shield extruder, strand shield extruder, and a main extruder; and
 - (3) No. 4, 5 and 6 CV Lines (ID#s E-1c, E-1d, and E-1e) which exhaust through general ventilation GV. Each of these lines is equipped with a strand shield extruder and a main extruder.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates (uncontrolled)).

Low Voltage Compounding process (ID# 3) with a maximum capacity of 3.5 tons per hour, constructed in 1954 and consisting of the following:

 - (i) One (1) jet zone cooler that exhausts through stack SS-31; and
 - (ii) One (1) raw material bucket charging operation, one (1) primary Banbury mixer, and one (1) secondary Banbury mixer, attached to a baghouse (ID# SS-76) and exhausting through stack SS-76.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) Other categories with emissions below insignificant thresholds:
Wire Drawing Lines; No. 1 and 2 Tinning Lines; CPE/PVC Line; No. 1 Poly Line; J3 Line; Armor Lines, Braiding Lines; Philsheath Lines; and Bunching Lines.
- (e) One (1) waste oil burner with heat input capacity of 500,000 Btu per hour.
- (f) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

- (g) Closed loop heating and cooling systems.
- (h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent by volume.
- (i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (j) Heat exchanger cleaning and repair.
- (k) Asbestos abatement projects regulated by 326 IAC 14-10.
- (l) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (m) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (n) Vehicle traffic.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit 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 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit 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 annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), 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.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
 - (c) 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 Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
 - (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967
- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) 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.
- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC13-30-3-1] [13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, an authorized representative, or the U.S. EPA to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

-
- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
 - (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
 - (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration);
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 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 permit:

- (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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

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

The Permittee 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).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 Permittee 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 Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ

upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit 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 Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit 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.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) natural gas fired boiler (ID# 1) using no. 2 fuel oil as a back-up, with a maximum heat input capacity of 48.0 million Btu per hour, constructed in 1952 and exhausting through stack SS-1.
- (b) One (1) natural gas fired boiler (ID# 2) using no. 2 fuel oil as a back-up, with a maximum heat input capacity of 42.0 million Btu per hour, constructed in 1942 and exhausts through stack SS-2.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from Boilers ID #1 and #2 shall be limited to 0.45 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

C = 50 u/m³

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr)

N = number of stacks

a = plume rise factor (0.67)

h = stack height (ft)

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from the boilers ID # 1 and 2, each rated at 48.0 and 42.0 MMBtu/hr, respectively, shall not exceed five tenths (0.5) pounds per MMBtu heat input when combusting No. 2 fuel oil. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a thirty (30) day rolling weighted average.

D.1.3 Fuel Usage Limitation [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4(1), the following limit shall apply:

The total input of No. 2 fuel oil to the two (2) boilers (ID# 1 and 2) rated at 48.0 and 42.0 MMBtu/hr, respectively, shall be limited to less than 2,580,000 U.S. gallons per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit sulfur dioxide (SO₂) from the source to less than 100 tons per 12 consecutive month period with compliance determined at the end of each month, based on a maximum fuel oil sulfur content of 0.5% by weight.

Compliance with this condition makes the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.1.5 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options when the boilers are fired with No. 2 fuel oil.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification; or
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boilers (ID # 1 and 2), using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the boilers ID# 1 and 2 stack exhaust shall be performed once per shift during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.3 when burning No. 2 fuel oil, the Permittee shall maintain records in accordance with (1) through (6) below.
- (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the boiler ID # 1 and 2 stack exhausts while combusting fuel oil.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

- (a) The natural gas fired boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (c) One (1) North Lead line (ID# 5) with a maximum capacity of 3.3 tons per hour, with particulate emissions controlled by a baghouse (ID # SS-9), and exhausting through stack SS-9. This lead line is equipped with an organic solvent wash pot, and adhesive application pot, a lead pot, a dross pot, two (2) rubber extruders, and a lead press extruder. Both the organic solvent wash pot and the adhesive application pot exhaust through stack SS-50 (constructed in 1967).
- (d) One (1) South Lead Line (ID# 6) with a maximum capacity of 2.1 tons per hour of lead, not controlled by any control devices, and exhausting through stacks SS-8 and SS-50. This lead line is equipped with an organic solvent wash pot, and adhesive application pot, a lead pot, a dross pot, and rubber extruder, and a lead press extruder (constructed in 1967).
- (e) One (1) lead stripper operation (ID# 8) with a maximum capacity of 18.0 tons per hour of lead, with particulate emissions controlled by two baghouses (ID#s SS-51A and SS-51B), constructed in 1986 and exhausting through a common stack SS-51 (constructed in 1986). There is also one (1) associated solvent wash pot exhausting through stack ID# SS-52.
- (f) No. 8 Rewind and Unshield Lines with maximum solvent usage of 15.5 tons per year and consisting of following (constructed in 1967):
 - (1) No. 8 Rewind Line (ID# 9a) which exhausts through stack SS-64. This line is equipped with three (3) organic solvent wash pots;
 - (2) Unshield Line (ID# 9b) which exhausts through stack SS-65. This line is equipped with an organic solvent wash pot.
- (g) Stranding Lines, CAT CV, and Continuous Vulcanization (CV) Lines with maximum solvent usage of 6.3 tons per year and consisting of following (constructed in 1967):
 - (1) Stranding Lines which exhaust through general ventilation GV;
 - (2) No. 1, 2, and 3 CAT CV Lines (ID#s CV-1, CV-2 and CV-3 (constructed in 1997)) which exhaust through general ventilation (GV). Each of these lines is equipped with an insulation shield extruder, strand shield extruder, and a main extruder; and
 - (3) No. 4, 5 and 6 CV Lines (ID#s E-1c, E-1d, and E-1e) which exhaust through general ventilation GV. Each of these lines is equipped with a strand shield extruder and a main extruder.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following facilities shall be limited as follows:

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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Emission Unit	Process Weight Rate (ton/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
S-9 (North Lead Line, ID: #5)	3.30	9.12
S-8 (South Lead Line, ID: #6)	2.10	6.74
S-51 (Lead Stripper, ID: #8)	18.0	28.4

D.2.2 FESOP PM10 limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), PM10 emissions from the North Lead Line (ID# 5), South Lead Line (ID # 6) and Lead Stripper (ID # 8) shall be limited to 5.03, 3.20 and 3.04 lb/hr, respectively, which is equivalent to total PM10 emissions of 49.36 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.2.3 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

The Permittee shall comply as follows:

- (a) The total volatile organic compounds (VOC) input minus the VOC waste disposed off-site to the operations including North and South Lead lines (ID #s 5 and 6), No. 8 Rewind Line and Unishield lines, CAT CV 1-3 lines, CV 4-6 lines, and insignificant activities shall be limited to less than 97.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the source-wide VOC emissions shall be limited to less than 100 tons per twelve (12) consecutive month period.
- (b) The single hazardous air pollutants (HAP) and total HAPs input minus the HAP waste disposed off-site to the operations including North and South Lead lines (ID #s 5 and 6), CAT CV 1-3 lines, CV 4-6 lines, and insignificant activities shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the source-wide single HAP and total HAPs emissions shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period, respectively.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Lead Stripper (ID# 8) and its control devices.

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP input limitations contained in Condition D.2.3, and the amount of VOC waste disposed off-site shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.6 Visible Emissions Notations

- (a) Visible emission notations of the Lead Stripper stack exhaust shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.7 Parametric Monitoring

The Permittee shall record the differential pressure across the baghouse used in conjunction with the Lead Stripper, at least once per shift when it is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

D.2.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the Lead Stripper. All defective bags shall be replaced.

D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouses's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and/or the VOC and HAPs emission limits established in Condition D.2.3.
- (1) VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent used less water on monthly basis.
 - (i) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (ii) Records of used solvent sent off site as waste shall be maintained when such is included in a demonstration of compliance with Conditions D.2.3.
 - (3) The volume weighted VOC and HAP content of the coatings used for each month.
 - (4) The cleanup solvent usage for each month.
 - (5) The total VOC and HAP usage for each month.
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of once per shift visible emission notations of the Lead Stripper stack exhausts.
- (c) To document compliance with Condition D.2.7, the Permittee shall maintain once per shift

records of the differential pressure during normal operation when venting to the atmosphere.

- (d) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-7-1(34).

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: General Cable Industries, Inc.
Source Address: 440 East 8th Street, Marion, IN 46953
Mailing Address: 440 East 8th Street, Marion, IN 46953
FESOP No.: 053-14834-00001

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: General Cable Industries, Inc.
Source Address: 440 East 8th Street, Marion, IN 46953
Mailing Address: 440 East 8th Street, Marion, IN 46953
FESOP No.: 053-14834-00001

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
☐ The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
☐ The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: General Cable Industries, Inc.
Source Address: 440 East 8th Street, Marion, IN 46953
Mailing Address: 440 East 8th Street, Marion, IN 46953
FESOP No.: 053-14834-00001

<input checked="" type="checkbox"/> Natural Gas Only
<input checked="" type="checkbox"/> Alternate Fuel burned
From: _____ To: _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature: _____
Printed Name: _____
Title/Position: _____
Date: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: General Cable Industries, Inc.
 Source Address: 440 East 8th Street, Marion, IN 46953
 Mailing Address: 440 East 8th Street, Marion, IN 46953
 FESOP No.: 053-14834-00001
 Facility: North and South Lead lines (ID #s 5 and 6), No. 8 Rewind Line and Unshield lines, CAT CV 1-3 lines, CV 4-6 lines, Others and insignificant activities
 Parameter: VOC Emissions
 Limit: Total VOC input minus the VOC waste disposed off-site to the listed facilities shall be limited to less than 97.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	VOC usage per month (tons) I	VOC shipped off-site as waste per month (tons) II	VOC input per month (tons) III = I-II	VOC input for previous 12 months (tons) III
Month 1				
Month 2				
Month 3				

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: General Cable Industries, Inc.
 Source Address: 440 East 8th Street, Marion, IN 46953
 Mailing Address: 440 East 8th Street, Marion, IN 46953
 FESOP No.: 053-14834-00001
 Facility: North and South Lead lines (ID #s 5 and 6), Lead Stripper (ID # 8), No. 8 Rewind Line and Unishield lines, CAT CV 1-3 lines, CV 4-6 lines, Others and insignificant activities
 Parameter: single HAP and total HAPs
 Limit: Single HAP and total HAPs input minus the HAP waste disposed off-site to the listed facilities shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

YEAR: _____

Month	HAP usage per month A. worst single (tons) B. total (tons) I	HAP shipped off-site as waste per month A. worst single (tons) B. total (tons) II	HAP input per month A. worst single (tons) B. total (tons) III = I - II	HAP input for previous 12 months A. worst single (tons) B. total (tons) III
Month 1				
Month 2				
Month 3				

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: General Cable Industries, Inc.
 Source Address: 440 East 8th Street, Marion, IN 46953
 Mailing Address: 440 East 8th Street, Marion, IN 46953
 FESOP No.: 053-14834-00001
 Facility: Boilers ID # 1 and 2
 Parameter: No. 2 fuel oil usage
 Limit: Total input of No. 2 distillate fuel oil with a maximum sulfur content of 0.5% boilers ID# 1 and 2 shall be limited to less than 2,580,000 U.S. gallons per twelve (12) consecutive month period with compliance determined at the end of each month, so that SO₂ emissions are limited below 100 tons per year.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	No. 2 Distillate Fuel Oil Usage This Month	No. 2 Distillate Fuel Oil Usage Previous 11 Months	12 Month Total No. 2 Distillate Fuel Oil Usage
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: General Cable Industries, Inc.
 Source Address: 440 East 8th Street, Marion, IN 46953
 Mailing Address: 440 East 8th Street, Marion, IN 46953
 FESOP No.: 053-14834-00001

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality**

**Addendum to the
Technical Support Document (TSD) for a Federally Enforceable State Operating
Permit (FESOP) Renewal**

Source Background and Description

Source Name: General Cable Industries, Inc.
Source Location: 440 East 8th Street, Marion, IN 46953
County: Grant
SIC Code: 3357, 3087, 3356, 3471, 3499
Operation Permit No.: F053-14834-00001
Permit Reviewer: Adeel Yousuf / EVP

On March 18, 2004, the Office of Air Quality (OAQ) had a notice published in the Marion Chronicle Tribune in Munster, Marion, Indiana, stating that General Cable Industries, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a cable manufacturing plant. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed FESOP renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP renewal should be issued as proposed.

On April 16, 2004, Guinn P. Doyle on behalf of General Cable Industries, Inc., submitted comments on the proposed FESOP renewal permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted).

Comment 1

B.11 Annual Compliance Certification

This condition requires that the Permittee certify compliance with all the terms and conditions in the FESOP even if the terms or conditions did not apply to the Permittee such as Conditions B.4, B.6, B.9, and C.11 (in part). IDEM should revise the permit to identify each condition that does not apply to the Permittee for purposes of the Annual Compliance Certification. Alternatively, the condition should be revised to allow the Permittee to provide a general compliance certification supported by the required quarterly reports covering the reporting period.

Response 1

Pursuant to rule 326 IAC 2-8-5(a)(1), it's a Permittee's responsibility to identify which conditions in the permit are subject to compliance certification requirements. This is also explicitly stated under B.11(c)(1) "the appropriate identification of each term or condition of this permit that is the basis of the certification." Also, the conditions in the B and C sections are general conditions applicable to the source and can not contain references to other permit conditions (i.e. Section D conditions) as the permit conditions could be modified in the future, in which case all such conditions would need to be modified and will create confusion.

Furthermore, the Non-Rule Policy Revision Document (AIR 007 NPD; Guidelines for Submittal and Review of Annual Compliance Certification under the Federally Enforceable State Operating Permit (FESOP) and Part 70 Programs), which became effective in 2003, clearly states that “the source should review the permit terms and conditions carefully when completing the annual compliance certification to make sure the certification is accurate and address each relevant permit term and condition.” Therefore in accordance with AIR 007 NPD, IDEM, OAQ has determined that it is the Permittee’s responsibility to certify compliance with each permit condition.

As stipulated by Condition B.11, Annual Compliance Certifications are required to be submitted annually pursuant to 326 IAC 2-8-5(1), and can not be incorporated as an alternative to quarterly reports. There will be no changes to this condition in the final permit as a result of this comment.

Comment 2

B.12 Preventive Maintenance Plan

Preventive Maintenance Plans are only required for emission units that have emission control devices that are necessary to comply with the FESOP. Condition B.12 should be modified to read as follows:

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) ~~for~~ **for emission control devices** including the following information on each ~~facility~~ **emission control device**:

- (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.

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) 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 Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

Response 2

The Preventive Maintenance Plan requirement must be included in every applicable FESOP permit pursuant to 326 IAC 2-8-4(9). This rule refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)).
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(1)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. 326 IAC 1-6-3(b) provides that "...as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section."

Additionally, if an emission unit is subject to PMP requirements then the D section for that emission unit will contain a PMP requirement. This is also illustrated in paragraph (a) of condition B.13 "If required by specific condition(s) in Section D of this permit....". Therefore it is not necessary to explain explicitly in condition B.12 that PMP requirements apply only to emission units with control devices and what units. There will be no changes to this condition in the final permit as a result of this comment.

Comment 3

B.20 Inspection and Entry

Permit condition B.20 should define who would be an authorized representative. Second, the permit condition B.20 is inconsistent with the wording of the regulation and should be revised as follows:

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC 13-30-3-1] [13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, **an authorized representative, or the U.S. EPA,** ~~or an authorized representative~~ to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

Response 3

An employee of IDEM, with a proper identification card is considered an authorized representative of the Commissioner. IDEM, OAQ feels that the language contained in condition B.20 adequately fulfills the intent of the condition and it is not necessary to define the "authorized representative" in the condition. The language has been revised to be consistent with the language of the regulations as follows:

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC13-30-3-1] [13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, **an authorized representative, or the U.S. EPA,** ~~or an authorized representative~~ to perform the following:

Comment 4

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour

This condition should be revised to delete subsection (a) because 40 CFR 52 Subpart P does not incorporate 326 IAC 6-3-2(e)(2) concerning processes that have a process weight rate of less than one hundred (100) pounds per hour.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

~~(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

~~(a)(b)~~ Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

Response 4

The rule 40 CFR Subpart P establishes particulate emission limitations for process operations. Any surface coating operation at the source which has a process weight rate less than 100 pounds per hour will be subject to the requirements of 40 CFR Subpart P until the revisions to 326 IAC 6-3 are approved into the SIP. The 0.551 lb/hr emission rate is directly calculated from the equation ($E = 4.01P^{0.67}$) contained under rule 326 IAC 6-3-2, at the process weight rate of 100 lb/hr. Therefore, it is mandatory to have 40 Subpart P particulate emission limitation for an insignificant surface coating operation. There will be no changes to this condition in the final permit as a result of this comment.

Comment 5

C.2 Overall Source Limit

This condition should be revised to eliminate the reference to 326 IAC 2-3 which does not apply to the Permittee as the source is located in an area that is designated as in attainment with all regulated pollutants.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. ~~This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);~~

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

~~(c)(b)~~ This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

~~(d)(c)~~ Section D of this permit contains independently enforceable provisions to satisfy this requirement.

Response 5

IDEM, OAQ agrees, Condition C.2 has been revised as follows:

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-32 (~~Emission Offset~~ **Prevention of Significant Deterioration**);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(eb) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(dc) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

Comment 6

C.9 Asbestos Abatement Projects

This condition should be revised simply to require that the Permittee comply with 326 IAC 14-10, rather than setting out portions of the rule, since many portions may or may not apply, depending on the circumstances.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with 326 IAC 14-10.

~~(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.~~

~~(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~

~~(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or~~

~~(2) If there is a change in the following:~~

~~(A) Asbestos removal or demolition start date;~~

~~(B) Removal or demolition contractor; or~~

~~(C) Waste disposal site.~~

~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~

~~(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

~~(e) Procedures for Asbestos Emission Control The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(e). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~

~~(f) Demolition and Renovation The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).~~

~~(g) Indiana Accredited Asbestos Inspector The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.~~

Response 6

As requested, Condition C.9 has been replaced with a streamlined version of Asbestos Abatement Projects simply stating that the Permittee shall comply with 326 IAC 14-10. The following changes have been made to the permit as a result of this comment.

~~C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]~~

~~(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.~~

~~(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~

~~(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or~~

~~(2) If there is a change in the following:~~

~~(A) Asbestos removal or demolition start date;~~

~~(B) Removal or demolition contractor; or~~

~~(C) Waste disposal site.~~

~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~

- ~~(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(e) Procedures for Asbestos Emission Control~~

~~The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~

- ~~(f) Demolition and Renovation~~

~~The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).~~

- ~~(g) Indiana Accredited Asbestos Inspector~~

~~The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.~~

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

Comment 7

C.14 Pressure Gauge and Other Instrument Specifications

The rules of the Indiana Air Pollution Control Board do not authorize IDEM to specify what type of gauge must be utilized. Second, the Permittee does not utilize a PH meter. This condition should be deleted.

~~C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]~~

~~(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.~~

~~(b) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.~~

~~(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.~~

Response 7

Condition C.14 (Pressure Gauge and Other Instrument Specifications) is required by IDEM, OAQ to ensure that the measurements of operational parameters that are set in the permit are in fact being met by the source. Without requiring a certain degree of accuracy in the equipment, the operating parameters will not provide reasonable assurance of compliance. IDEM, OAQ believes that monitoring the pressure drop across the baghouses is important for determining the proper operation of the baghouses (see response to comment 21). In order to accurately measure the pressure drop, adequate pressure drop gauges must be used. The authority for the condition is under 326 IAC 2-1.1-11, 326 IAC 2-8-4(3) and 326 IAC 2-8-5(1) and is cited in the title of the condition. However, IDEM, OAQ agrees that the Permittee does not utilize a pH meter, therefore subsection (b) is not applicable and has been removed. The following change has been made to Condition C.14 as a result of this comment.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

~~(b) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.~~

(~~b~~) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Comment 8

C.16 Compliance Response Plan

The rules of the Indiana Air Pollution Control Board do not authorize the Indiana Department of Environmental Management to require a compliance response plan. As EPA stated with respect to Indiana's Title V program: "Applicable requirements must exist independently of Title V permits... Title V authority cannot modify existing applicable requirements." See 67 Fed. Reg. 34844, 34847 (May 16, 2002). In addition, as noted in EPA's recent rulemaking entitled "Revisions to Clarify the Scope of Certain Monitoring Requirements for Federal and State Operating Permits Programs," the general umbrella provisions do not "authorize permitting authorities to create new monitoring in operating permits." See 69 Fed. Reg. 3202. Therefore, this condition must be deleted.

~~C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]~~

~~(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:~~

~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.~~

~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~

~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~

~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~

~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~

~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~

~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~

~~(c) The Permittee is not required to take any further response steps for any of the following reasons:~~

~~(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~

~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.~~

~~(3) An automatic measurement was taken when the process was not operating.~~

~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~

~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~

~~(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~

~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~

Response 8

An important goal of the FESOP program is to assure that each Permittee has the ability to assure compliance with applicable requirements on a continuous basis.

During the development of the FESOP and Part 70 permit program, IDEM worked with interested parties, such as the:

Clean Air Act Advisory Council's Permit Committee,
Indiana Manufacturing Association,
Indiana Chamber of Commerce, and
individual Part 70 sources.

A consensus was reached that written plans, outside of the permit document, such as the Compliance Response Plan (CRP), are vital tools that the Permittee can implement to ensure compliance. CRPs are also the documents to implement if an emission unit or air pollution control device deviates from its normal operation.

It is correct that 326 IAC 2-8-4 and 326 IAC 2-8-5 do not have or use the exact term "CRP" however, 326 IAC 2-8-5(a)(4) provides the Department the authority to specify provisions in the FESOP as the Commissioner may require with respect to ensuring compliance with applicable requirements. IDEM has determined that a CRP provision is necessary with respect to compliance assurance.

The requirement to develop and implement the plan does not prescribe any new applicable requirement. The CRP is a compilation of reasonable responses, schedules, work practices and other information developed by the Permittee from the standpoint of good business practices and the prevention of environmental problems. The Permittee has to implement these reasonable responses and schedules to maintain or return to compliance. The steps documented in the plan are reasonable actions to be taken for specific deviations that occur at the emission unit or control device.

Permittees already have maintenance schedules and trouble shooting guidelines that specify options and steps to be taken when the emission unit or control device is not operating or functioning properly. The Permittee has the knowledge, expertise and experience on how to operate the equipment at the plant, and is required to develop the CRP based on this knowledge, experience and expertise. The CRP maintains the documentation, such that changes in personnel will not hinder the proper operation of the emission unit and control device. The CRP provides the plant's employees a quick reference on how to respond when an emission unit or air pollution control device deviates from its normal operation, thus avoiding long periods of deviations.

While the IDEM, OAQ recognizes the U.S. EPA's action and its interpretation of the federal provisions, the action does not affect the OAQ's ability or authority to require compliance monitoring in FESOP and Part 70 permits. Indiana's FESOP (326 IAC 2-8-4) rules concerning compliance monitoring are significantly different than the corresponding federal counterpart (40 CFR 70.6). 40 CFR 70.6(c)(1) states that all FESOP and Part 70 permits shall contain sufficient compliance monitoring to demonstrate compliance. The provisions of 326 IAC 2-8-4(3) state that the Part 70 permits must include: "Monitoring and related record keeping and reporting requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements." The need to ensure continuous compliance in 326 IAC 2-8-4(3) gives IDEM broader authority than what is specified in 40 CFR 70.6(c)(1). In addition, the language of 326 IAC 2-8-4(3) clearly suggests that existing federal monitoring requirements are considered only as minimum permit requirements. Therefore, the difference between the corresponding state and federal rules results in IDEM's warranted and legal ability to institute additional and more stringent compliance monitoring. There will be no changes to this condition in the final permit, due to this comment.

Comment 9

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test

The rules of the Indiana Air Pollution Control Board do not authorize the Indiana Department of Environmental Management to impose the requirements in C.17(a), (b), or (c). This condition should be deleted in its entirety.

~~C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]~~

~~(a) When the results of a stack test performed in conformance with Section C – Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.~~

~~(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.~~

~~(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests. The response action documents submitted pursuant to this condition do require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).~~

Response 9

Condition C.17 (Actions Related to Noncompliance Demonstrated by a Stack Test) can not be removed from the permit. OAQ has authority under 326 IAC 2-8-5(4) to require this condition. OAQ also has authority under 326 IAC 2-8-4. Since this source does not have any testing requirements, this condition would not be applicable to the source at this time. However, the condition is required to stay in the permit because a new emission unit could be added to the source at some later date that could require testing. If the new emission unit has testing requirements, the Permittee will be aware of its responsibilities under the testing requirements. There will be no changes to this condition in the final permit, due to this comment.

Comment 10

D.1.4 Preventive Maintenance Plan

Preventive Maintenance Plans are only required for emission control devices. The boilers are not equipped with emission control devices. Moreover, nothing in Condition B.12 or D.1.4 describes what is required of a preventive maintenance plan for boilers.

~~D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]~~

~~A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for these facilities.~~

Response 10

The Preventive Maintenance Plan requirement must be included in every applicable FESOP permit pursuant to 326 IAC 2-8-4(9). This rule refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. 326 IAC 1-6-3(b) provides that "...as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section."

Many types of facilities require maintenance in order to prevent excess emissions. In addition to preventive maintenance performed on the control devices, preventive maintenance should be performed on the boilers themselves because lack of proper maintenance on the boiler can result in boiler tube leaks or improper burner air settings which can result in increased emissions. There will be no changes to this condition in the final permit, due to this comment.

Comment 11

D.1.5 Sulfur Dioxide Emissions and Sulfur Content

This condition should be revised to make it clear that the condition only applies when the boilers are fired with Number 2 fuel oil.

Compliance shall be determined utilizing one of the following options **when the boilers are fired with Number 2 fuel oil.**

(a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by:

- (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification; or
- (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

(A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Response 11

IDEM, OAQ agrees and has decided to make the following change as requested.

D.1.5 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options **when the boilers are fired with No. 2 fuel oil.**

Comment 12

D.1.6 Visible Emission Notations

Rules of the Indiana Air Pollution Control Board do not authorize IDEM to require that the Permittee determine when emissions or "normal" or "abnormal". As EPA stated with respect to Indiana's Title V program: "Applicable requirements must exist independently of Title V permits... [T]itle V authority cannot modify existing applicable requirements." See 67 Fed. Reg. 34844, 34847 (May 16, 2002). In addition, as noted in EPA's recent rulemaking entitled "Revisions to Clarify the Scope of Certain Monitoring Requirements for Federal and State Operating Permits Programs," the general umbrella provisions do not "authorize permitting authorities to create new monitoring in operating permits." See 69 Fed. Reg. 3202. Permit condition D.1.6 establishes a "standard" that has not been developed by notice and comment rulemaking and must be deleted.

~~D.1.6 Visible Emissions Notations~~

~~(a) Visible emission notations of the boilers ID# 1 and 2 stack exhaust shall be performed once per shift during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.~~

~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~

~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~

~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C—Compliance Monitoring Plan—Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

Response 12

Compliance monitoring conditions such as the requirement to perform visible emission notations, are required in order to demonstrate continuous compliance with the permit requirements. Visible emission notations are used to indicate compliance with 326 IAC 5-1 and the particulate matter limits pursuant to 326 IAC 6-2-3. This requirement is designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with emission limitations.

There is sufficient authority for IDEM to require visible emission notations as part of Compliance Monitoring. 326 IAC 2-8-4(1) requires that all FESOP permits contain operational requirements and limitations that assure compliance with all applicable requirements. 326 IAC 2-8-4(3) requires that all FESOP permits contain monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with applicable requirements. 326 IAC 2-8-4(3)(ii) requires that, at a minimum, the periodic monitoring requirements must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance, even where the applicable requirement does not require periodic testing or instrumental monitoring. There will be no changes to this condition in the final permit, due to this comment.

Comment 13

D.1.7 Recordkeeping Requirements

This condition should be revised to clearly indicate that it only applies for the period when fuel oil is used to fire the boilers. This condition requires submission of "supporting information that includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation..." If the "supporting information" relates to monitoring equipment, it should be deleted as the boilers are not equipped with emission monitoring instrumentation. If it does not, then it should be removed because it requires submission of information the Permittee is not required to maintain. This condition requires the statement from a fuel supplier that certifies the sulfur content. This is not a record required by Condition D.1.5. Finally, Condition D.1.7(b) should be removed consistent with the deletion of Condition D.1.6 which is also not authorized by the rules of the Indiana Air Pollution Control Board.

D.1.7 Record Keeping Requirements

(a) To document compliance with Conditions D.1.2 and D.1.3 **when burning Number 2 fuel oil**, the Permittee shall maintain records in accordance with (1) through (6) below.

(1) Calendar dates covered in the compliance determination period;

(2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;

(3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1); and If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained.

(4) ~~Fuel supplier~~ **Vendor's analysis and** certifications.

(5) The name of the fuel supplier; and

(6) ~~A statement from the fuel supplier that certifies the sulfur content of the fuel oil.~~

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes ~~all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and~~ copies of all reports required by this permit.

~~(b) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the boiler ID # 1 and 2 stack exhausts while combusting fuel oil.~~

~~(e)~~(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Response 13

IDEM, OAQ agrees to add "when burning No. 2 fuel oil" under subsection (a) as requested. However, it is not necessary to replace "Fuel Supplier" with "Vendor" as any vendor supplying fuel would be considered a "Fuel Supplier".

Subsection (a)(6) will not be removed because the "statement from the fuel supplier that certifies the sulfur content of the fuel oil" is essential to show compliance with sulfur dioxide limit stated under Condition D.1.5. Without such statement, IDEM would have no way to determine whether the source is complying with the sulfur dioxide limit. Therefore, it is essential to keep records of these statements.

IDEM, OAQ agrees with the source to remove the reference to "strip chart recordings for continuous monitoring instrumentation" as the unit does not have any strip chart recorders and is not required to have any continuous monitoring instrumentations. However, the reference to "calibration and maintenance records" will remain as these are applicable to the unit at this source.

For the reasons mentioned above under Response 12, the facility is subject to the requirements of visible emission notations as part of the compliance monitoring, therefore, subsection (b) can not be removed and will remain in the final permit. The following changes have been made in the final permit as a result of this comment:

D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.3 **when burning No. 2 fuel oil**, the Permittee shall maintain records in accordance with (1) through (6) below.
- (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1); and If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:
 - (4) Fuel supplier certifications.

- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records ~~and all original strip chart recordings for continuous monitoring instrumentation~~, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the boiler ID # 1 and 2 stack exhausts while combusting fuel oil.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 14

D.1.8 Reporting Requirements

The Natural Gas Fired Boiler Certification form should be deleted because the FESOP Quarterly Report will satisfy the underlying requirement. If it is not deleted, then it should be revised to include the reporting period covered by the form.

Response 14

The Natural Gas Fired Certification on page 37 of 43 of the permit is to be submitted semi-annually to certify what type of fuel (natural gas or alternative fuel) has been burned in the past six months. Natural gas certification serves the assurance that unit is complying with the particulate limit in Condition D.1.1 as visible emission notation is not required when natural gas is burned. The natural Gas Fired Certification is separate from the FESOP Quarterly Report which will report alternative fuel usage every quarter. The following change has been made as a result of this comment.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) SEMI- ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION

Comment 15

D.2.1 Particulate

The table in Condition D.2.1 should be revised to correct the units in the Process Weight Rate column to tons/hour from pounds/hour.

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following facilities shall be limited as follows:

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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Emission Unit	Process Weight Rate (lb/hr) Ton/hr	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
S-9 (North Lead Line, ID: #5)	3.30	9.12
S-8 (South Lead Line, ID: #6)	2.10	6.74
S-51 (Lead Stripper, ID: #8)	18.0	28.4

Response 15

The following change has been made as requested to the table in Condition D.2.1.

Emission Unit	Process Weight Rate (lb/hr) (ton/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
S-9 (North Lead Line, ID: #5)	3.30	9.12
S-8 (South Lead Line, ID: #6)	2.10	6.74
S-51 (Lead Stripper, ID: #8)	18.0	28.4

Comment 16

D.2.3 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)
 Condition D.2.3(a) and (b) require determination of compliance by the amount of VOC and HAP “delivered” to the emission unit. Compliance with the VOC and HAPs emission limit cannot be determined by the amounts delivered because not all VOCs and HAPs delivered to the emission units are emitted. Some VOCs and HAPs are shipped off-site as waste and therefore are not emitted. Rather than use VOC and HAPs delivered, General Cable proposes to demonstrate compliance with the VOCs and HAPs limits using the proposed forms attached to these comments as Attachment A. D.2.3(a) and (b) use the term “Others” which is not defined and therefore should be removed.

D.2.3 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

The Permittee shall comply as follows:

(a) The total volatile organic compounds (VOC) ~~delivered to~~ **emitted from** the operations including North and South Lead lines (ID #s 5 and 6), Lead Stripper (ID # 8), No. 8 Rewind Line and Unishield lines, CAT CV 1-3 lines, CV 4-6 lines, ~~Others~~ and insignificant activities shall be limited to less than 97.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the source-wide VOC emissions shall be limited to less than 100 tons per twelve (12) consecutive month period.

(b) The single hazardous air pollutants (HAP) and total HAPs ~~delivered to~~ **emitted from** the operations including North and South Lead lines (ID #s 5 and 6), Lead Stripper (ID # 8), CAT CV 1-3 lines, CV 4-6 lines, ~~Others~~ and insignificant activities shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the source-wide single HAP and total HAPs emissions shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period, respectively.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION

FESOP Semi-Annual Report

Source name: General Cable Industries, Inc.
 Source Address: 440 East 8th Street, Marion, Indiana 46953
 FESOP No.: F053-5471-00001
 Facility: entire source
 Parameter: HAP emissions
 Limit: single HAP - Less than 10 tons per 12 consecutive month period rolled on a monthly basis
 total HAPs - Less than 25 tons per 12 consecutive month period rolled on a monthly basis

Year _____

Month	HAP usage per month	HAP shipped-off as waste per month	HAP emissions per month	HAP emissions for previous 12 months
	A. worst single (tons) B. total (tons)			
	I	II	III=I-II	III
Month 1 (Month)	A. B.	A. B.	A. B.	A. B.
Month 2 (Month)				
Month 3 (Month)				
Month 4 (Month)				
Month 5 (Month)				
Month 6 (Month)				

Submitted by: _____

Title/Position: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION

FESOP Semi-Annual Report

Source name: General Cable Industries, Inc.
 Source Address: 440 East 8th Street, Marion, Indiana 46953
 FESOP No.: F053-5471-00001
 Facility: entire source
 Parameter: VOC emissions
 Limit: VOC - Less than 100 tons per 12 consecutive month period rolled on a monthly basis

Year _____

Month	VOC usage per month (tons) I	VOC shipped-off as waste per month (tons) II	VOC emissions per month (tons) III=I-II	VOC emissions for previous 12 months (tons) III
Month 1 (Month)				
Month 2 (Month)				
Month 3 (Month)				
Month 4 (Month)				
Month 5 (Month)				
Month 6 (Month)				

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Response 16

IDEM, OAQ agrees that all the VOC delivered is not emitted as some of it is disposed off-site as waste. However, IDEM, OAQ prefers to use the term "input" instead of "emitted" since the coating material usage and related VOC and volatile organic HAP emissions assume an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operations. In addition, reference to Lead Stripper (ID #8) has been removed as the source has confirmed that Lead Stripper does not use any VOC anymore. IDEM, OAQ has agreed to make the following changes in Condition D.2.3 as a result of this comment.

D.2.3 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

The Permittee shall comply as follows:

- (a) The total volatile organic compounds (VOC) ~~delivered input usage to the operations including North and South Lead lines (ID #s 5 and 6), No. 8 Rewind Line and Unishield lines, CAT CV 1-3 lines, CV 4-6 lines, and insignificant activities, including solvent usage, minus the VOC in coating materials and/or cleanup solvents shipped out to be disposed,~~ to the operations including North and South Lead lines (ID #s 5 and 6), Lead Stripper (ID # 8), No. 8 Rewind Line and Unishield lines, CAT CV 1-3 lines, CV 4-6 lines, Others and insignificant activities shall be limited to less than 97.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the source-wide VOC emissions shall be limited to less than 100 tons per twelve (12) consecutive month period.
- (b) The single hazardous air pollutants (HAP) and total HAPs ~~delivered input usage to the operations including North and South Lead lines (ID #s 5 and 6), No. 8 Rewind Line and Unishield lines, CAT CV 1-3 lines, CV 4-6 lines, and insignificant activities, including solvent usage, minus the VOC in coating materials and/or cleanup solvents shipped out to be disposed,~~ to the operations including North and South Lead lines (ID #s 5 and 6), Lead Stripper (ID # 8), CAT CV 1-3 lines, CV 4-6 lines, Others and insignificant activities shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the source-wide single HAP and total HAPs emissions shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period, respectively.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

Furthermore, Quarterly Reporting is required to document compliance with the VOC and HAP limitations listed in Condition D.2.3 of the permit. If reporting was only submitted semi-annually, the possibility of exceeding the limitations at the facility would not be detected soon enough and would lead to a deviation from the permit requirements. There will be no change in the reporting frequency. FESOP Quarterly reporting forms have been revised as follows.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: General Cable Industries, Inc.
 Source Address: 440 East 8th Street, Marion, IN 46953
 Mailing Address: 440 East 8th Street, Marion, IN 46953
 FESOP No.: 053-14834-00001
 Facility: North and South Lead lines (ID #s 5 and 6), ~~Lead Stripper (ID # 8),~~
 No. 8 Rewind Line and Unshield lines, CAT CV 1-3 lines, CV 4-6
 lines, ~~Others~~ and insignificant activities
 Parameter: VOC Emissions

Limit: Total VOC emissions input minus the VOC waste disposed off-site ~~from to~~ the listed facilities shall be limited to less than 97.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions This Month	VOC Emissions Previous 11 Months	VOC Emissions 12 Month Total
Month 1			
Month 2			
Month 3			

Month	VOC usage per month (tons) I	VOC shipped-off-site as waste per month (tons) II	VOC input per month (tons) III=I-II	VOC input for previous 12 months (tons) III
Month 1				
Month 2				
Month 3				

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: General Cable Industries, Inc.
 Source Address: 440 East 8th Street, Marion, IN 46953
 Mailing Address: 440 East 8th Street, Marion, IN 46953
 FESOP No.: 053-14834-00001
 Facility: North and South Lead lines (ID #s 5 and 6), ~~Lead Stripper (ID # 8),~~
 No. 8 Rewind Line and Unishield lines, CAT CV 1-3 lines, CV 4-6
 lines, ~~Others~~ and insignificant activities

Parameter: single HAP and total HAPs
 Limit: Single HAP and total HAPs ~~emissions~~ **input minus the HAP waste disposed off-site from to** the listed facilities shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

YEAR: _____

Month	Column 1		Column 2		Column 1 + Column 2	
	Single HAP Emission This Month (tons)	Total HAP Emission This Month (tons)	Single HAP Emission Previous 11 Months (tons)	Single HAP Emission Previous 11 Months (tons)	Single HAP Emission 12 Month Total (tons)	Total HAP Emission 12 Month Total (tons)
Month 1						
Month 2						
Month 3						

Month	HAP usage per month A. worst single (tons) B. total (tons)	HAP shipped off-site as waste per month A. worst single (tons) B. total (tons)	HAP input per month A. worst single (tons) B. total (tons)	HAP input for previous 12 months A. worst single (tons) B. total (tons)
	I	II	III=I-II	III
Month 1	A. B.	A. B.	A. B.	A. B.
Month 2	A. B.	A. B.	A. B.	A. B.
Month 3	A. B.	A. B.	A. B.	A. B.

Comment 17

D.2.4 Volatile Organic Compounds (VOCs)

This condition should be removed as General Cable no longer uses VOCs in the lead stripper.

D.2.4 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The total input usage of volatile organic compounds (VOC) at Lead Stripper (ID # 8), shall be less than 25 tons per twelve (12) consecutive month period. Compliance with these limitations shall make the requirements of 326 IAC 8-1-6 (BACT) not applicable to the source.

Response 17

IDEM, OAQ has decided to remove Condition D.2.4 as the Permittee has confirmed that no VOC is used or emitted from the Lead Stripper (ID # 8). References to the Lead Stripper were also removed from Condition D.2.3 and the Quarterly reporting forms as noted in Response 16. Condition D.12 (now re-numbered D.2.11) has been revised as well to reflect this change. All the succeeding conditions have been re-numbered accordingly. Following changes have been made as a result of this comment.

~~D.2.4 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]~~

~~The total input usage of volatile organic compounds (VOC) at Lead Stripper (ID # 8), shall be less than 25 tons per twelve (12) consecutive month period. Compliance with these limitations shall make the requirements of 326 IAC 8-1-6 (BACT) not applicable to the source.~~

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: ~~General Cable Industries, Inc.~~
Source Address: ~~440 East 8th Street, Marion, IN 46953~~
Mailing Address: ~~440 East 8th Street, Marion, IN 46953~~
FESOP No.: ~~053-14834-00001~~
Facility: ~~Lead Stripper (ID # 8)~~
Parameter: ~~VOC~~
Limit: ~~The total input usage of VOC at Lead Stripper (ID # 8) shall be limited to less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	VOC This Month	VOC Previous 11 Months	VOC for 12 Month Total
Month 1			
Month 2			
Month 3			

~~☑ No deviation occurred in this quarter.~~

~~☑ Deviation/s occurred in this quarter.
Deviation has been reported on:~~

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

D.2.121 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions ~~D.2.3 and D.2.4~~ shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-7-1(34).

Comment 18

D.2.5 Preventive Maintenance Plan

The rules of the Indiana Air Pollution Control Board only require a preventive maintenance plans for emission control devices. Moreover, the uncontrolled potential PM emissions from this unit is 3.0 lbs/hr which is significantly less than the allowable PM emissions of 28.4 lbs/hr and therefore there is no need for a preventive maintenance plan.

~~D.2.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Lead Stripper (ID# 8) and its control devices.~~

Response 18

Due to the reasons listed under Response 10, Condition D.2.6 (now re-numbered D.2.5) is required for this unit and will not be removed from the permit.

Comment 19

D.2.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

This condition should be revised to delete the reference to Condition D.2.4 and to be consistent with the reporting method proposed by General Cable for determining compliance with the VOC and HAPs limits. (see Attachment A)

D.2.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC and HAP ~~content and usage limitations~~ **emission limits** contained in Conditions D.2.3 ~~and D.2.4~~ shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Response 19

For the reasons mentioned under Response 16, IDEM, OAQ prefers to use the term "input" than using "emitted" in regards to VOC and HAPs limitations, therefore to be consistent with the Condition D.2.3 revision, the following changes have been made to Condition D.2.6 (now re-numbered D.2.5).

Additionally, to incorporate the changes made under comment/resonse 16, the Permittee shall evaluate the VOC waste disposed as per 326 IAC 8-1-4. This change has been made as follows:

D.2.65 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

- (a) Compliance with the VOC and HAP ~~content and usage~~ **input** limitations contained in Conditions D.2.3 ~~and D.2.4~~ shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

- (b) The Permittee shall determine the VOC and HAP contents of the coating material and/or clean-up solvents in a container shipped out to be disposed by one of the following:**
- (1) The VOC and HAP contents of cleanup solvent in a container shipped out to be disposed may be determined by the:**
- (A) as applied VOC and HAP data sheets for the solvent, if the container consists of only one (1) cleanup solvent, or**
- (B) the weighted average of the as applied VOC and HAP data sheets for all of the solvents in container, if the weight of each solvent in the container is known.**
- (2) The VOC and HAP contents of the combined coating material and/or cleanup solvents in a container shipped out to be disposed shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner. The sampling must be conducted after the final addition to the container. Testing shall be conducted in accordance with Section C-Performance Testing, except for notifying IDEM of the test in paragraph (a), all of paragraph (b), and all of paragraph (c).**
- (c) Compliance with the VOC and HAP input limitations contained in condition D.2.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total VOC and HAP used for the previous month, minus the VOC and HAP solvent shipped out to be disposed, and adding it to previous 11 months total VOC and HAP usages, minus the VOC and HAP solvent shipped out to be disposed, so as to arrive at VOC and HAP emissions for the most recent twelve (12) consecutive month period.**

For the limits in condition D.2.3, the VOC and HAP emissions for a month can be arrived at using the following equation:

$$VOC\ emitted = SCO - SD$$

Where

SCO = The total amount of VOC and HAPs, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, for the North and South Lead lines (ID #s 5 and 6), No. 8 Rewind Line and Unishield lines, CAT CV 1-3 lines, CV 4-6 lines, and insignificant activities; and

SD = The total amount of VOC and HAPs, in tons, shipped out to be disposed, including coatings, dilution solvents, and cleaning solvents, for the North and South Lead lines (ID #s 5 and 6), No. 8 Rewind Line and Unishield lines, CAT CV 1-3 lines, CV 4-6 lines, and insignificant activities.

Comment 20

D.2.7 Visible Emissions Notations

The rules of the Indiana Air Pollution Control Board do not authorize the Indiana Department of Environmental Management to require visible emission notations for the lead stripper. As EPA stated with respect to Indiana's Title V program: "Applicable requirements must exist independently of Title V permits... [T]itle V authority cannot modify existing applicable requirements." See 67 Fed. Reg. 34844, 34847 (May 16, 2002). In addition, as noted in EPA's recent rulemaking entitled "Revisions to Clarify the Scope of Certain Monitoring Requirements for Federal and State Operating Permits Programs," the general umbrella provisions do not "authorize permitting authorities to create new monitoring in operating permits." See 69 Fed. Reg. 3202. Also, as stated above, the potential uncontrolled emissions from this unit are approximately a tenth of the allowable PM emissions and therefore there is no basis for this condition. Permit condition D.2.7 establishes a "standard" that has not been developed by notice and comment rulemaking and must be deleted.

~~D.2.7 Visible Emissions Notations~~

~~(a) Visible emission notations of the Lead Stripper stack exhaust shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.~~

~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~

~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~

~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C—Compliance Response Plan—Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

Response 20

Due to the reasons mentioned under Response 12, visible emission notations are required as a compliance monitoring requirement to demonstrate continuous compliance with the permit requirements. There will be no change made to the permit as a result of this comment.

Comment 21

D.2.8 Parametric Monitoring

The rules of the Indiana Air Pollution Control Board do not authorize IDEM to impose this condition. As EPA stated with respect to Indiana's Title V program: "Applicable requirements must exist independently of Title V permits... [T]itle V authority cannot modify existing applicable requirements." See 67 Fed. Reg. 34844, 34847 (May 16, 2002). In addition, as noted in EPA's recent rulemaking entitled "Revisions to Clarify the Scope of Certain Monitoring Requirements for Federal and State Operating Permits Programs," the general umbrella provisions do not "authorize permitting authorities to create new monitoring in operating permits." See 69 Fed. Reg. 3202. Moreover, the potential uncontrolled PM emissions from this unit are significantly less than allowable PM emissions so there is no basis for this condition.

~~D.2.8 Parametric Monitoring~~

~~The Permittee shall record the differential pressure across the baghouse used in conjunction with the Lead Stripper, at least once per shift when it is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C—Compliance Response Plan—Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take~~

~~response steps in accordance with Section C—Compliance Response Plan—Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

~~The instrument used for determining the pressure shall comply with Section C—Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.~~

Response 21

326 IAC 2-8-4 and 326 IAC 2-8-5(a)(1) provide IDEM the authority to require compliance monitoring conditions as necessary to assure continuous compliance with the emission limits. The monitoring of the pressure drop of the baghouses provides an indication of whether the control device is operating properly. Monitoring of the static pressure drop can alert the operator to relative changes (such as dust cake resistance) over a period of time. The operator can use this information to chart trends and determine if the unit is operating within the optimal range as determined by baseline testing of the unit and manufacturer's specifications. Pressure drop is an indicator of a variety of conditions within the baghouse. Any deviations from the normal operational range of the unit, whether gradual or sudden, should alert the operator that the unit needs maintenance. The Compliance Response Plan should include response steps to anticipate corrective actions when abnormal conditions arise. Both gradual and sudden changes in the pressure drop could result in damage to the bags if not properly addressed.

Furthermore, failure to take any response steps after observing a pressure drop that is outside the normal range is considered a deviation from the permit. An abnormal pressure drop can indicate a pending or current malfunction of the control device, which could cause an exceedance of a particulate matter limitation or an exceedance of an opacity limit. Without taking any response steps or doing any stack tests, the only information available regarding emissions would be that the pressure drop of the baghouse was outside the normal operating range. Without any other evidence to the contrary, the out of range pressure drop would be credible evidence that the control device was not functioning properly and emissions from the stack could be in violation of the particulate matter and opacity limits in the permit. For these reasons, the Permittee is required to take response steps whenever the pressure drop is outside the normal range, and the failure to take any response steps in accordance with the CRP will be considered a deviation from the permit. The requirements to measure the pressure drops across the baghouses will not be deleted from the permit.

Comment 22

D.2.9 Baghouse Inspections

This condition is not authorized by the rules of the Indiana Air Pollution Control Board and therefore must be deleted. As EPA stated with respect to Indiana's Title V program: "Applicable requirements must exist independently of Title V permits... [T]itle V authority cannot modify existing applicable requirements." See 67 Fed. Reg. 34844, 34847 (May 16, 2002). In addition, as noted in EPA's recent rulemaking entitled "Revisions to Clarify the Scope of Certain Monitoring Requirements for Federal and State Operating Permits Programs," the general umbrella provisions do not "authorize permitting authorities to create new monitoring in operating permits." See 69 Fed. Reg. 3202.

D.2.9 Baghouse Inspections

~~An inspection shall be performed each calendar quarter of all bags controlling the Lead Stripper. All defective bags shall be replaced.~~

Response 22

326 IAC 2-8-4 and 326 IAC 2-8-5(a)(1) provide IDEM the authority to require compliance monitoring conditions as necessary to assure continuous compliance with the emission limits. These rule cites are included as part of the title of the compliance monitoring section of the permit. The baghouses must operate properly in order for the processes to achieve compliance with the applicable PM emission limits; therefore, IDEM believes it is reasonable and necessary to require the source to inspect the baghouses periodically. There has been no change to the permit as a result of this comment.

Comment 23

D.2.10 Broken and Failed Bag Detection

This condition is not authorized by the rules of the Indiana Air Pollution Control Board and therefore must be deleted. As EPA stated with respect to Indiana's Title V program: "Applicable requirements must exist independently of Title V permits... [T]itle V authority cannot modify existing applicable requirements." See 67 Fed. Reg. 34844, 34847 (May 16, 2002). In addition, as noted in EPA's recent rulemaking entitled "Revisions to Clarify the Scope of Certain Monitoring Requirements for Federal and State Operating Permits Programs," the general umbrella provisions do not "authorize permitting authorities to create new monitoring in operating permits." See 69 Fed. Reg. 3202.

~~D.2.10 Broken or Failed Bag Detection~~

~~In the event that bag failure has been observed:~~

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

~~(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouses's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or tribeflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

Response 23

326 IAC 2-8-4 and 326 IAC 2-8-5(a)(1) provide IDEM the authority to require compliance monitoring conditions as necessary to assure continuous compliance with the emission limits. The baghouses must operate properly in order for the processes to achieve compliance with the applicable PM emission limits; therefore, IDEM believes it is reasonable and necessary to require the source to take appropriate response steps, as specified in Condition D.2.10 (now re-numbered D.2.9), whenever bag failure occurs. There has been no change to the permit as a result of this comment.

Comment 24

D.2.11 Record Keeping Requirements

This condition should be revised to reflect the use of the procedure General Cable proposes to demonstrate compliance with the VOC and HAPs emission limits. This condition should also be revised to remove the reference to condition D.2.4 as the unit no longer uses VOCs as well as the deletion of conditions D.2.7, 2.8, and 2.9.

D.2.11 Record Keeping Requirements

(a) To document compliance with Conditions D.2.3 ~~and D.2.4~~, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and/or the VOC and HAPs emission limits established in Conditions D.2.3 ~~and D.2.4~~.

(1) VOC and HAP content of each coating material and solvent used.

(2) The amount of coating material and solvent used less water on ~~daily~~ **monthly** basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The volume weighted VOC and HAP content of the coatings used for each month.

(4) The cleanup solvent usage for each month.

(5) The total VOC and HAP sent off site as waste each month.

(6) The weight of VOCs emitted for each compliance period.

~~(b) To document compliance with Condition D.2.7, the Permittee shall maintain records of once per shift visible emission notations of the Lead Stripper stack exhausts.~~

~~(c) To document compliance with Condition D.2.8, the Permittee shall maintain once per shift records of the differential pressure during normal operation when venting to the atmosphere.~~

~~(d) To document compliance with Condition D.2.9, the Permittee shall maintain records of the results of the inspections required under Condition D.2.9.~~

~~(b)(e) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.~~

Response 24

As explained in responses to comments 20, 21 and 22, IDEM does not agree to delete the visible emission notations, parametric monitoring, and baghouse inspection requirements. As explained in responses 20, 21 and 22 above, IDEM does not agree that the compliance monitoring does not apply to the emission units and has ample authority to require compliance monitoring. As a result, the record keeping conditions associated with these requirements have been retained in the permit. The following changes have been made to Condition D.2.11 (now re-numbered D.2.10) to be consistent with the removal of Condition D.2.4, revision to Condition D.2.6 (now re-numbered D.2.5) and revisions to VOC and HAP reporting procedure.

D.2.140 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.3 ~~and D.2.4~~, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and/or the VOC and HAPs emission limits established in Conditions D.2.3 ~~and D.2.4~~.

- (1) VOC and HAP content of each coating material and solvent used.
 - (2) The amount of **VOC in coating materials and solvents used less water shipped out to be disposed on daily a monthly basis.**
 - (A) Records shall include ~~purchase orders, invoices, and material safety data sheets (MSDS)~~ **weight of coating material or cleaning solvent in each container, VOC content test results, and “as supplied” sheets, as necessary to verify the type and amount used.**
 - (B) **Cleaning solvent disposal records shall differentiate between those containers whose contents are just cleanup solvents and those containers with coating materials and cleanup solvents or various cleanup solvents of unknown individual amounts.**
 - (3) The volume weighted VOC and HAP content of the coatings used for each month.
 - (4) The cleanup solvent usage for each month.
 - (5) The total VOC and HAP usage for each month.
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.76, the Permittee shall maintain records of once per shift visible emission notations of the Lead Stripper stack exhausts.
 - (c) To document compliance with Condition D.2.87, the Permittee shall maintain once per shift records of the differential pressure during normal operation when venting to the atmosphere.
 - (d) To document compliance with Condition D.2.98, the Permittee shall maintain records of the results of the inspections required under Condition D.2.98.
 - (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 25

D.3 Facility Description

In the facility descriptions, (b) and (c) should be changed to indicate that gasoline storage capacity is 250 gallons and that the Permittee only dispenses around 300 gallons annually or approximately 25 gallons per month. Alternatively this whole condition should be deleted for the reasons described below.

Facility Description [326 IAC 2-8-4(10)]: (Insignificant Activity)

(a) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates (uncontrolled)).

Low Voltage Compounding process (ID# 3) with a maximum capacity of 3.5 tons per hour, constructed in 1954 and consisting of the following:

- (i) One (1) jet zone cooler that exhausts through stack SS-31; and
- (ii) One (1) raw material bucket charging operation, one (1) primary Banbury mixer, and one (1) secondary Banbury mixer, attached to a baghouse (ID# SS-76) and exhausting through stack SS-76.

(b) A gasoline fuel transfer and dispensing operation handling less than or equal to ~~4,300~~ **250** gallons per day, such as filling of tanks, automobiles, having a storage capacity less than or equal to ~~40,500~~ **250** gallons.

(c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

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

Response 25

Entire section D.3 has been removed since none of the listed emission activities are subject to any rules. The following changes have been made as a result of this comment:

~~SECTION D.3~~ **FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-8-4(10)]: (Insignificant Activity)

~~(a) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates (uncontrolled)).~~

~~Low Voltage Compounding process (ID# 3) with a maximum capacity of 3.5 tons per hour, constructed in 1954 and consisting of the following:~~

~~(i) One (1) jet zone cooler that exhausts through stack SS-31; and~~

~~(ii) One (1) raw material bucket charging operation, one (1) primary Banbury mixer, and one (1) secondary Banbury mixer, attached to a baghouse (ID# SS-76) and exhausting through stack SS-76.~~

~~(b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, automobiles, having a storage capacity less than or equal to 10,500 gallons.~~

~~(c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.~~

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

Furthermore, there is no need to change the throughput of gasoline fuel transfer and dispensing operation and the storage capacity to 250 gallons as it does not matter how much fuel is used and/or stored as long as the throughput does not exceed the threshold. This threshold is listed under the rule 326 IAC 2-7-1(21)G(ii)(AA). Therefore, the fuel dispensing operation throughput and storage capacity under Condition A.3(b) will be retained at 1,300 gallons per day and 10,500 gallons, respectively.

Comment 26

D.3.1 Particulate

Condition D.3.1 should be removed because the uncontrolled potential-to-emit PM for these emission units is 0.0114 and 0.0034 lbs/hr respectively. These uncontrolled potential-to-emit values are significantly less than the allowable PM emissions for each emission unit of 9.49 lbs/hr.

~~D.3.1 Particulate [326 IAC 6-3]~~

~~Pursuant to 326 IAC 6-3-2 ((Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following emission units shall be limited as follows:
 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:~~

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

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions 326 IAC 6-3-2 (lb/hr)
S-31 (Jet zone cooler)	3.50	9.49
S-76 (Banbury charging and mixing)	3.50	9.49

Response 26

IDEM, OAQ agrees and Condition D.3.1 will be deleted as requested because each emission unit (S-31 and S-76) has potential particulate emissions less than 0.551 lb/hr, therefore these operations are exempt from the requirements of 326 IAC 6-3. The following change has been made as a result of this comment.

~~D.3.1 Particulate [326 IAC 6-3]~~

~~Pursuant to 326 IAC 6-3-2 ((Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following emission units shall be limited as follows:
 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:~~

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

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions 326 IAC 6-3-2 (lb/hr)
S-31 (Jet zone cooler)	3.50	9.49
S-76 (Banbury charging and mixing)	3.50	9.49

Comment 27

~~D.3.2 Volatile Organic Compounds (VOC)~~

~~This condition should be removed because General Cable only has storage capacity for 250 gallons and only dispenses approximately 300 gallons of gasoline annually.~~

~~D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-6, 326 IAC 8-4-9]~~

~~Any change or modification which may increase monthly gasoline throughput to ten thousand (10,500) gallons or more from the gasoline fuel transfer and dispensing operation shall require approval from IDEM, OAQ, prior to making the change.~~

Response 27

IDEM, OAQ agrees and has decided to remove Condition D.3.2 since the annual gasoline throughput is well under the 10,500 gallon threshold. The following change has been made as a result of this comment.

~~D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-6, 326 IAC 8-4-9]~~

~~Any change or modification which may increase monthly gasoline throughput to ten thousand (10,500) gallons or more from the gasoline fuel transfer and dispensing operation shall require approval from IDEM, OAQ, prior to making the change.~~

Comment 28

D.3.3 Record Keeping Requirement

This condition should be deleted because General Cable only dispenses approximately 300 gallons of gasoline annually.

~~D.3.3 Record Keeping Requirement~~

~~To document compliance with Condition D.3.2, the Permittee shall maintain records of total monthly gasoline throughput at the transfer and dispensing station. These records shall be maintained in accordance with Section C - General Record Keeping Requirements. There are no specific reporting requirements applicable to these facilities.~~

Response 28

In order to be consistent with the removal of Condition D.3.2, the corresponding record keeping requirement (Condition D.3.3) has been removed as well. The following change has been made as a result of this comment.

~~D.3.3 Record Keeping Requirement~~

~~To document compliance with Condition D.3.2, the Permittee shall maintain records of total monthly gasoline throughput at the transfer and dispensing station. These records shall be maintained in accordance with Section C - General Record Keeping Requirements.~~

Upon further review, OAQ has determined the following changes (bolded language has been added and the language with a line through it has been deleted) will be made to the permit:

1. The table of contents has been revised as follows to make it consistent with the permit body.

B.22 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16] **[326 IAC 2-1.1-7]**

2. Condition B.22(c) has been revised to reflect the correct name of the section.

~~B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]~~

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, ~~IM~~ & Billing, **Licensing, and Training** Section), to determine the appropriate permit fee.

3. Condition C.7 has been revised as follows to correct a typographical error.

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit~~(s)~~ vented to the control equipment is ~~(are)~~ in operation.

4. Following conditions have been revised to change the words "violation" to "deviation" and "monitoring" to "response" to be consistent with other conditions in the permit.

D.1.6 Visible Emissions Notations

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response Plan - Preparation, Implementation, Records, and Reports**, shall be considered a ~~violation of~~ **deviation from** this permit.

D.2.6 Visible Emissions Notations

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

D.2.7 Parametric Monitoring

The Permittee shall record the differential pressure across the baghouse used in conjunction with the Lead Stripper, at least once per shift when it is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

D.2.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response Plan - Preparation, Implementation, Records, and Reports**, shall be considered a ~~violation of~~ **deviation from** this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

5. Condition D.2.2 has been revised to remove the annual limit as it is not necessary to have it listed in this condition.

D.2.2 FESOP PM10 limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), PM10 emissions from the North Lead Line (ID# 5), South Lead Line (ID # 6) and Lead Stripper (ID # 8) shall be limited to 5.03, 3.20 and 3.04 lb/hr, respectively, ~~which is equivalent to total PM10 emissions of 49.36 tons per year.~~ Therefore, the requirements of 326 IAC 2-7 do not apply.

6. Condition D.2.8 has been revised to require that the quarterly baghouse inspections required shall not be performed in consecutive months.

D.2.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the Lead Stripper. All defective bags shall be replaced. **Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.**

7. FESOP Quarterly Deviation and Compliance Monitoring Report form has been revised to clarify the language.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: General Cable Industries, Inc.
Source Address: 440 East 8th Street, Marion, IN 46953
Mailing Address: 440 East 8th Street, Marion, IN 46953
FESOP No.: 053-14834-00001

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. ~~Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.** Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: General Cable Industries, Inc.
Source Location: 440 East 8th Street, Marion, IN 46953
County: Grant
SIC Code: 3357, 3087, 3356, 3471, 3499
Operation Permit No.: F053-14834-00001
Permit Reviewer: Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from General Cable Industries, Inc. relating to the operation of cable manufacturing plant. General Cable Industries, Inc. was issued FESOP 053-5471-00001 on June 6, 1997.

Source History

This source has requested IDEM to change the company's name to 'General Cable Industries, Inc' from the former name of 'BICC General Cable'.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) natural gas fired boiler (ID# 1) using no. 2 fuel oil as a back-up, with a maximum heat input capacity of 48.0 million Btu per hour, constructed in 1952 and exhausting through stack SS-1.
- (b) One (1) natural gas fired boiler (ID# 2) using no. 2 fuel oil as a back-up, with a maximum heat input capacity of 42.0 million Btu per hour, constructed in 1942 and exhausts through stack SS-2.
- (c) One (1) North Lead line (ID# 5) with a maximum capacity of 3.3 tons per hour, with particulate emissions controlled by a baghouse (ID # SS-9), and exhausting through stack SS-9. This lead line is equipped with an organic solvent wash pot, and adhesive application pot, a lead pot, a dross pot, two (2) rubber extruders, and a lead press extruder. Both the organic solvent wash pot and the adhesive application pot exhaust through stack SS-50 (constructed in 1967).
- (d) One (1) South Lead Line (ID# 6) with a maximum capacity of 2.1 tons per hour of lead, not controlled by any control devices, and exhausting through stacks SS-8 and SS-50. This lead line is equipped with an organic solvent wash pot, and adhesive application pot, a lead pot, a dross pot, and rubber extruder, and a lead press extruder (constructed in 1967).

- (e) One (1) lead stripper operation (ID# 8) with a maximum capacity of 18.0 tons per hour of lead, with particulate emissions controlled by two baghouses (ID#s SS-51A and SS-51B), constructed in 1986 and exhausting through a common stack SS-51 (constructed in 1986). There is also one (1) associated solvent wash pot exhausting through stack ID# SS-52.
- (f) No. 8 Rewind and Unishield Lines with maximum solvent usage of 15.5 tons per year and consisting of following (constructed in 1967):
 - (1) No. 8 Rewind Line (ID# 9a) which exhausts through stack SS-64. This line is equipped with three (3) organic solvent wash pots;
 - (2) Unishield Line (ID# 9b) which exhausts through stack SS-65. This line is equipped with an organic solvent wash pot.
- (g) Stranding Lines, CAT CV, and Continuous Vulcanization (CV) Lines with maximum solvent usage of 6.3 tons per year and consisting of following (constructed in 1967):
 - (1) Stranding Lines which exhaust through general ventilation GV;
 - (2) No. 1, 2, and 3 CAT CV Lines (ID#s CV-1, CV-2 and CV-3 (constructed in 1997)) which exhaust through general ventilation (GV). Each of these lines is equipped with an insulation shield extruder, strand shield extruder, and a main extruder; and
 - (3) No. 4, 5 and 6 CV Lines (ID#s E-1c, E-1d, and E-1e) which exhaust through general ventilation GV. Each of these lines is equipped with a strand shield extruder and a main extruder.

Note: Brockville Lead Line (ID # 7), permitted in the original FESOP 053-5471-000001 has been removed from the source. Middle Lead Line (ID # 6) has been renamed as the South Lead Line. The identification number remains the same. No. 6 Rewind/Paint, and Unishield Lines as permitted in the original FESOP has been renamed to, No. 8 Rewind Line and Unishield Lines and painting is no longer done on this line.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates (uncontrolled)).
 - Low Voltage Compounding process (ID# 3) with a maximum capacity of 3.5 tons per hour, constructed in 1954 and consisting of the following:
 - (i) One (1) jet zone cooler that exhausts through stack SS-31; and
 - (ii) One (1) raw material bucket charging operation, one (1) primary Banbury mixer, and one (1) secondary Banbury mixer, attached to a baghouse (ID# SS-76) and exhausting through stack SS-76.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, automobiles, having a storage capacity less than or equal to 10,500 gallons.

- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) Other categories with emissions below insignificant thresholds:
Wire Drawing Lines; No. 1 and 2 Tinning Lines; CPE/PVC Line; No. 1 Poly Line; J3 Line; Armor Lines, Braiding Lines; Philsheath Lines; and Bunching Lines.
- (e) One (1) waste oil burner with heat input capacity of 500,000 Btu per hour.
- (f) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (g) Closed loop heating and cooling systems.
- (h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent by volume.
- (i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (j) Heat exchanger cleaning and repair.
- (k) Asbestos abatement projects regulated by 326 IAC 14-10.
- (l) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (m) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (n) Vehicle traffic.

Existing Approvals

- (a) FESOP 053-5471-00001, issued on June 6, 1996; and expired on June 6, 2001.
- (b) First Administrative Amendment 053-10947-00001, issued on June 1, 1999.
- (c) Second Administrative Amendment 053-11047-00001, issued on September 23, 1999.

All conditions from previous approvals were incorporated into this FESOP except the following:

FESOP 053-5471-00001, issued on June 6, 1996.

General Cable Industries, Inc. (General Cable) was issued a FESOP operating permit (053-5471-00001) on June 6, 1997. General Cable petitioned for review of the FESOP operating permit on June 23, 1997. The petition was filed in the Office of Environmental Adjudication under Cause Number 97-A-J-1806. General Cable has applied for a FESOP renewal permit (053-14834-00001) on September 6, 2001. This FESOP renewal shows the changes made to the FESOP operating permit in order to settle issues raised by the petition for review.

Appeal Item 1: [FESOP operating permit appeal, Cause No. 97-A-J-1806]

The Petitioner objects to condition B.12(c) (Annual Compliance Certification). The permittee believes that the condition should clarify the specific terms to which the annual compliance certification should apply.

Response 1:

IDEM, OAQ is unable to grant the requested changes to the annual compliance certification language in condition B.12(c) (now re-numbered to B.11 in this FESOP renewal). The condition B.11 reflects the applicable requirement from the regulation, where subsections (1) through (5) cover the general information that will always be needed in the annual compliance certification. Section D may indicate that additional information is to be included. For detailed discussion and applicable standard for the annual compliance certification, Permittee should review IDEM non rule policy document available at IDEM website at <http://www.in.gov/idem/air/rules/nrpd/>. No changes will be made to the condition as a result of the petition for review.

Appeal Item 2:

The petitioner objects to Condition B.13, D.1.6, D.2.3, D.3.3, D.4.3, D.5.3 and D.6.3 (Preventive Maintenance Plans). The petitioner states that the FESOP should clarify: 1) preventive maintenance plans are only required for emission control devices, 2) preventive maintenance plans are only required for units that have allowable emissions in excess of the registration threshold.

Response 2:

IDEM, OAQ has decided to remove the Preventive Maintenance Plan due to following reasons:

Condition D.2.3, Preventive Maintenance Plan for the Low Voltage Compounding Operation has not been incorporated in this FESOP renewal since this operation has been re-evaluated as an insignificant activity with negligible emissions and does not require the operation of control device to comply with any limits.

Condition D.3.3 (Preventive Maintenance Plan) has not been incorporated in this FESOP renewal due to following reasons:

- (i) North Lead Line (ID # 5) has a voluntary control equipment and the uncontrolled particulate emissions are lower than the 326 IAC 6-3-2 allowable, therefore no Preventive Maintenance Plan is required for this emission unit.
- (ii) Middle Lead Line (ID # 6) (now known as South Lead Line) has no control device and the uncontrolled particulate emissions are lower than the 326 IAC 6-3-2 allowable, therefore no Preventive Maintenance Plan is required for this emission unit.
- (iii) Brockville Lead Line (ID #7) has been removed from the source.

Conditions D.5.3 and D.6.3 (Preventive Maintenance Plan) have not been incorporated in this FESOP renewal because upon inspecting the source, IDEM, OAQ has determined that the PMP is not required for these units.

The PMP is required for the Lead Stripper (Condition D.4.3) and the two boilers (Condition D.1.3).

Appeal Item 3:

The petitioner objects to Conditions B.19 (Minor Permit Modifications), B.20 (Significant Permit Modification), B.21 (Permit Revisions Under Economic Incentives and Other Programs), B.22 (Changes Under Section 502(b)(10) of the Clean Air Act) and B.23 (Operational Flexibility). The Petitioner states the conditions should be deleted because the Permittee should not need to obtain approvals of any change unless the change results in a possible violation of a specific emission limitation or causes the plant's actual emissions to exceed the plant-wide FESOP cap.

Response 3:

Conditions B.19, B.20, B.21 and B.22 have been deleted and replaced with Condition B.17 (Permit Amendment or Revision). This revised condition addresses permit amendment or revision in accordance with 326 IAC 2-8-10 and 326 IAC 2-8-11.1. Condition B.23 (now Condition B.19 in this renewal) has been revised to remove the reference to Section 502(b)(10) of the Clean Air Act because this is a Part 70 requirement, and not a FESOP requirement.

Appeal Item 4:

The petitioner objects to Condition C.10 (Asbestos Abatement Projects). The petitioner states the condition should be modified to remove the requirements to follow both federal EPA requirements and IDEM requirements in connection with asbestos abatement projects. Therefore, the provision should be modified to remove the references to EPA requirements.

Response 4:

Condition C.10 (now re-numbered to C.9 in this FESOP renewal) has been revised and does not contain any references to EPA. This condition is now condition C.9 in this FESOP renewal permit.

Appeal Item 5:

The Petitioner objects to Conditions C.14 (VOC Emissions), C.15 (HAPs Emissions), C.18 (Semi-Annual Reporting), C.19(f) (General Reporting Requirements), C.1.8 (Semi-Annual Reporting) and Semi-Annual Reporting forms for VOC, HAPs and average sulfur content of No. 2 fuel oil. The Petitioner believes the permit should be revised in order to address the following issues:

- 1) Emission data should be calculated on a rolling semi-annual basis rather than monthly rolling averages since reporting is semi-annual.
- 2) Recordkeeping requirements in conditions C.14 and C.15 should be limited to emission information required to demonstrate compliance and should not include detailed requirements regarding the specific information needed and should not require the Permittee to keep records of the weight of the VOCs left in the product or the weight of the VOCs shipped off as waste.
- 3) The first report should cover the period from ninety (90) days after the effective date of the permit until the end of the first semi-annual period.
- 4) The reporting forms should not require unnecessary detailed information but instead should only require summary emission information.

Response 5:

IDEM, OAQ has reviewed the requested changes to the permit. Each issue mentioned in Appeal Item 5 is addressed as follows:

- 1) No changes will be made to the permit in regards to the reporting requirements. Emission data must be calculated on a monthly basis in order to demonstrate compliance.
- 2) Conditions C.14 and C.15 have been replaced in the renewal permit by condition D.2.11. This new condition no longer requires recordkeeping of the weight of the VOCs left in the product or the weight of the VOCs shipped off as waste. Condition D.2.11 requires appropriate recordkeeping to demonstrate compliance with the VOC and HAPs emission limitations as listed in condition D.2.3 of the FESOP renewal permit.
- 3) No changes will be made to the permit in regards to the reporting. Reporting is based on calendar quarters and the first report upon the FESOP renewal issuance shall be submitted within thirty (30) days of the end of the reporting period.
- 4) The reporting forms have been revised in this FESOP renewal permit.

Appeal Item 6:

The Petitioner objects to Condition C.16 (Monitoring Data Availability). The Petitioner states the condition should be deleted because no continuous monitoring requirements apply to the Permittee. The Petitioner states it is unduly burdensome for employees to track the time periods when equipment is not operating especially when no useful information is obtained.

Response 6:

IDEM, OAQ has reviewed the requested changes to condition C.16. The condition has been deleted from the FESOP permit renewal.

Appeal Item 7:

The Petitioner objects to Conditions D.2.2, D.3.2 and D.4.2 (Testing Requirements). The Petitioner states the conditions should be deleted because the emissions from the associated emission units are too small for IDEM to require stack testing.

Response 7:

Conditions D.2.2, D.3.2 and D.4.2 (Testing Requirements) for Lead are not incorporated in this FESOP renewal because the source performed compliance testing (as required per original FESOP) during August and November of 1999. Compliance was demonstrated during each test as the tested Lead emission factors for all units were lower than the Lead emission factors used in the original FESOP (053-5471-00001). The use of emission factors based on recent test results plus particulate emitting activities with emissions below the related allowable particulate matter emission rates, satisfies OAQ testing requirements. Therefore, no testing requirement is included in this FESOP renewal.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on September 6, 2001. Additional information was received on April 21, 2002 and August 21, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 11).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	55.10
PM-10	55.10
SO ₂	195.92
VOC	141.72
CO	33.11
NO _x	56.31

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Toluene	45.49
Carbon tetrachloride	9.96
Xylene	9.00
Acetophenone	3.51
Ethylene thiourea	1.10
Lead	0.74
TOTAL	greater than 25

Only five worst case HAPs and Lead emissions are listed

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of SO₂ and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on September 6, 2001, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F053-5471-00001; issued on June 6, 1997).

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Boilers 1 and 2 ⁽²⁾	2.58	3.00	89.76	2.17	33.11	39.42	0.38 (single) 0.396 (total)
Low Voltage Compounding (LVC)	0.05	0.05	--	--	--	--	(1)
Lead Lines (North and South lead lines)	36.09	36.09	--	< 97.80	--	--	(1)
Lead Stripper	0.67	0.67	--		--	--	(1)
Stranding Lines, CAT CV Lines, and CV Lines	--	--	--		--	--	(1)
No. 8 Rewind and Unishield lines	--	--	--		--	--	--
Others	--	--	--		--	--	(1)
Total PTE After Issuance	39.39	39.81	89.76	< 100	33.11	39.42	< 10 (single) < 25 (total)

(1) Single HAP and total HAPs emissions from the operations at the entire source are limited to less than 10 and 25 tons per year, respectively.

(2) Boilers ID # 1 and 2 use natural gas as the primary fuel and # 2 fuel oil as back up fuel. The total represents worst case emissions for each pollutant.

County Attainment Status

The source is located in Grant County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Grant County has been designated as attainment or unclassifiable for ozone.
- (B) Grant county has been classified as attainment for all other pollutants.

Federal Rule Applicability

There are no new federal rules applicable to the source during this FESOP review process. The applicability determination that follows is based on that conducted for original FESOP F053-5471-00001, issued on June 6, 1997.

- (a) Two (2) boilers identified as ID# 1 and ID # 2, constructed in 1952 and 1942, and rated at 48 and 42 MMBtu per hour, respectively, are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because both were constructed prior to the rule applicability date of June 9, 1989.
- (b) The insignificant activities identified as “a petroleum fuel, other than gasoline, dispensing facility with storage capacity less than or equal to 10,500 gallons” and “a gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons” are not subject to the New Source Performance Standards, 326 IAC 12, (40 CFR Parts 60.110, 110a - 115a or 110b - 117b, as Subparts K, Ka, and Kb, respectively) since the storage capacities associated with these activities are below the minimum applicable threshold to the three rules (i.e., 40 cubic meters (10,568 gallons)).
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

There are no new state rules applicable to this source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP 053-5471-00001; issued on June 6, 1997.

The existing source was constructed prior to the August 7, 1977 rule applicability date. This source is not considered a major source because it is not one of the 28 listed source categories and it has the potential to emit after controls of less than 250 tons per year of any criteria pollutant. As a FESOP source, the total VOC, NO_x, CO, PM, PM₁₀ and SO₂ emissions shall be limited to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) shall not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Grant County and the potential to emit all criteria pollutants is less than one hundred (100) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM₁₀ is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

326 IAC 2-8-4 (FESOP)

SO₂, VOC and HAPs emissions will need to be limited as follows:

- (a) The usage of No. 2 distillate fuel oil for boilers #1 and #2, with a maximum sulfur content of 0.5%, and No. 2 distillate fuel oil equivalents shall be limited to 2,580,000 U.S. gallons per twelve (12) consecutive month period, so that SO₂ emissions are limited below 100 tons per year (see calculations on page 4 of 11, Appendix A). Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) The potential to emit NO_x from natural gas combustion for boilers #1 and #2 is less than 100 tons per year (39.42 tons per year, Appendix A. page 1 of 11). Therefore, limiting NO_x based on natural gas combustion is not necessary.
- (c) The total volatile organic compounds (VOC) delivered to the operations including North and South Lead lines (ID #s 5 and 6), Lead Stripper (ID # 8), No. 8 Rewind Line and Unshield lines, CAT CV 1-3 lines, CV 4-6 lines, Others and insignificant activities shall be limited to less than 97.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the source-wide VOC emissions shall be limited to less than 100 tons per twelve (12) consecutive month period.
- (d) The total hazardous air pollutants (HAP) delivered to the operations including North and South Lead lines (ID #s 5 and 6), Lead Stripper (ID # 8), CAT CV 1-3 lines, CV 4-6 lines, others and insignificant activities shall be limited such that the single HAP and total HAPs emissions shall not exceed 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the source-wide single HAP and total HAPs emissions shall be limited to less than 10 and 25 tons per twelve (12) consecutive month period, respectively.

Compliance with above conditions will limit the source-wide VOC, SO₂, and NO_x emissions including insignificant activities to less than 100 tons per twelve (12) consecutive month period, respectively. Compliance with above conditions will also limit the source-wide single HAP, and total HAPs emissions including insignificant activities to less than 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70) do not apply.

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 permit:

- (a) Opacity shall not exceed an average of forty percent (40%) 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.

State Rule Applicability - Individual Facilities

There are no new state rules applicable to the individual facilities during this FESOP review process. The applicability determination that follows is based on that conducted for original FESOP F053-5471-00001, issued on June 6, 1997.

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

The two (2) natural gas fired boilers (ID # 1 and 2), each with a maximum capacity of 48 and 42 MMBtu/hr and constructed in 1952 and 1942, respectively, are subject to the particulate matter limitations of 326 IAC 6-2. Pursuant to this rule, particulate emissions from indirect heating facilities constructed prior to September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

- C = 50 u/m³
- Pt = emission rate limit (lbs/mmBtu)
- Q = total source heat input capacity (mmBtu/hr)
- N = number of stacks
- a = plume rise factor (0.67)
- h = stack height in feet. If a number of stacks of different heights exist, average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times pa_i \times Q_i}{\sum_{i=1}^N pa_i \times Q_i}$$

where: Pa = the actual controlled emissions rate in lb/mmBtu using the emission factor form AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

For boilers ID # 1 and 2, both constructed before 1972 (Q = 48 + 42 = 90.0 mmBtu/hr)
Pt = (50*0.67*36)/(76.5*90.0^{0.75}*2^{0.25}) = 0.45 lbs PM/mmBtu

Compliance calculation:

$$(2.58 \text{ tons PM/yr}) * (\text{hr}/90.0 \text{ MMBtu}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.0065 \text{ lbs PM/MMBtu}$$

Actual emission rate for each of the boilers # 1 and # 2 is 0.0065 (lbs PM/MMBtu), and is less than allowable 0.45 (lbs PM/MMBtu), therefore the boilers will comply with the requirements of 326 IAC 6-2-3 (see Appendix A, page 4 of 10).

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The two (2) natural gas-fired boilers (ID # 1 and 2) using No. 2 fuel oil as back-up fuel are subject to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations). Pursuant to 326 IAC 7-1.1-2, sulfur dioxide emissions from the two (2) boilers using No. 2 fuel oil shall be limited to 0.5 pounds per million BTU heat input when using No. 2 fuel oil. This equates to a fuel oil sulfur content limit of 0.5%. The facility will comply with this rule by limiting distillate oil sulfur content to 0.5% or less.

326 IAC 7-2-1 (Sulfur Dioxide Reporting Requirements)

Pursuant to this rule, the source shall submit reports of calendar month average sulfur content, heat content, fuel consumption, and sulfur dioxide emission rate (pounds SO₂ per MMBtu), to the OAQ upon request.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) emissions from the following processes shall be limited by 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:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
 P = process weight rate in tons per hour

Emission Unit	Process Weight Rate (tons/hr)	Uncontrolled PM Emissions (lb/hr)	Control Efficiency %	Controlled PM Emissions (lb/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
S-31 (Jet zone cooler)*	3.50	0.0114	0	0.0114	9.49
S-76 (Banbury charging and mixing)*	3.50	0.0034	95	0.0002	9.49
S-9 (North Lead Line, ID: #5)	3.30	5.04	0	5.04	9.12
S-8 (South Lead Line, ID: #6)	2.10	3.20	0	3.20	6.74
S-51 (Lead Stripper, ID: #8)	18.0	3.04	95	0.152	28.4

* Insignificant Activity

All emission units will comply with the requirements of 326 IAC 6-3-2.

No. 8 Rewind and Unshield Lines, Stranding Lines, CAT CV, and Continuous Vulcanization (CV) Lines are not subject to the requirements of 326 IAC 6-3-2 because none of these operations

emit particulates.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and are not otherwise regulated by other provisions of Article 8. The operations including North and South Lead lines (ID #s 5 and 6), No. 8 Rewind Line and Unishield lines, CAT CV 1-3 lines, CV 4-6 lines and Stranding lines were constructed prior to rule applicability date of January 1, 1980, therefore, rule 326 IAC 8-1-6 does not apply to these operations.

Lead stripper (ID # 8) was constructed in 1986 and has potential VOC emissions above 25 tons per year. The VOC emissions from the Lead stripper (ID # 6) shall be limited to less than 25 tons per twelve (12) consecutive month period. Therefore the Best Available Control Technology (BACT) requirements under 326 IAC 8-1-6 (General Reduction Requirements) are not applicable to the Lead stripper (ID # 8).

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

Pursuant to 326 IAC 8-4-1 (Applicability) and 326 IAC 8-4-3 (Petroleum Liquid Storage Facilities), all petroleum liquid storage vessels with capacities greater than one hundred fifty thousand (150,000) liters (39,000 gallons) containing VOC whose true vapor pressure is greater than 10.5 kPa (1.52 psi) shall comply with the requirements for external fixed and floating roof tanks and the specified record keeping and reporting requirements. The insignificant activity identified as a petroleum fuel, other than gasoline, dispensing facility with storage capacity less than or equal to 10,500 gallons is not subject to the requirements of 326 IAC 8-4-3 since the storage tank capacity is below the 39,000 gallon threshold for rule applicability.

326 IAC 8-4-6 (Gasoline Dispensing Facilities) and 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems)

Pursuant to 326 IAC 8-4-1 (Applicability), the requirements of 326 IAC 8-4-6 (Gasoline Dispensing Facilities), shall apply to any gasoline storage tank and dispensing facility, except dispensing facilities with a monthly throughput of less than ten thousand (10,000) gallons per month and that were in existence prior to July 1, 1989. As an insignificant activity, the gasoline fuel transfer and dispensing operation was in existence at the source prior to July 1, 1989; however, based on usage records, the actual maximum throughput at the source is well below the 10,000 gallons per month applicability threshold. Therefore, these requirements do not apply to the source and the requirements of 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems) are likewise not applicable. The source shall maintain monthly records of the gasoline throughput at the dispensing facility and shall submit such records to OAQ upon request to demonstrate compliance with this determination.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to facilities commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source is located in Grant County and, as a FESOP source, shall limit total VOC to less than 100 tons per year. Therefore, this rule does not apply to this source.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons

per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Grant County. Therefore, this rule is not applicable to this source.

There are no other 326 IAC 8 rules that apply.

Testing Requirements

Pursuant to Conditions D.2.2, D.3.2 and D.4.2 of the original FESOP No. 053-5471-00001, the source performed compliance testing during August and November of 1999. Compliance was demonstrated during each test. No additional testing is included by condition of this renewal permit. The use of emission factors based on recent test results plus particulate emitting activities with emissions below the related allowable particulate matter emission rates, satisfies OAQ testing requirements.

Also, VOC and HAP compliance testing is not required of this source since the material usage and related VOC and volatile organic HAP emissions assume an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the manufacturing operations.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The following new compliance requirements were incorporated into this FESOP:

1. The two (2) boilers (ID # 1 and #2) have applicable compliance monitoring conditions when burning No. 2 fuel oil as specified below:
 - (a) Visible emission notations of the boilers 1 and 2 stack exhaust shall be performed once per shift during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.

For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the two (2) boilers (ID # 1 and 2) must operate properly to ensure compliance with 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) and 326 IAC 2-8 (FESOP).

2. The Lead Stripper (ID # 8) has applicable compliance monitoring conditions as specified below:
 - (a) Once per shift visible emission notations of the Lead Stripper stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (b) The Permittee shall record the differential pressure across the baghouse used in conjunction with the Lead Stripper, at least once per shift when it is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (c) An inspection shall be performed each calendar quarter of all bags controlling the Lead Stripper. All defective bags shall be replaced.

- (d) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (e) For single compartment baghouses, if failure is indicated by a significant drop in the baghouses's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouses (SS-51a and SS-51b) for the Lead Stripper (ID # 8) must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this cable manufacturing plant shall be subject to the conditions of the attached proposed FESOP No.: F053-14834-00001.

Appendix A: Emission Calculations

Company Name: General Cable Industries, Inc.
Address City IN Zip: 440 East 8th Street, Marion, IN 46953
FESOP No.: 053-14834-00001
Reviewer: Adeel Yousuf / EVP

Uncontrolled Potential Emissions (tons/year)									
Emissions Generating Activity									
Pollutant	Boiler # 1 and # 2 natural gas combustion	Boiler # 1 and # 2 # 2 Fuel oil combustion	Low Voltage Compounding	Lead Lines	Lead Stripper	Bunching and Stranding, CAT, and CV Lines	Others	No. 8 Rewind and Unshield Lines	TOTAL**
						HVC			
PM	0.75	5.63	0.06	36.09	13.32	0.00	0.00	0.00	55.10
PM10	3	5.63	0.06	36.09	13.32	0.00	0.00	0.00	55.10
SO2	0.24	195.92	0.00	0.00	0.00	0.00	0.00	0.00	195.92
NOx	39.42	56.31	0.00	0.00	0.00	0.00	0.00	0.00	56.31
VOC	2.17	0.96	0.00	10.30	48.30	6.30	59.15	15.50	141.72
CO	33.11	14.08	0.00	0.00	0.00	0.00	0.00	0.00	33.11
total HAPs	0.396	0.019	0.06	0.15	13.77	6.30	59.15	0.00	79.83
worst case single HAP	0.38 (hexane)	5.91E-3 (Selenium)	0.06 (lead)	0.15 (lead)	95 (Carbon tetrachloride)	76 (Carbon tetrachloride)	45.49 (Toluene)	0.00	45.49 (Toluene)
Total emissions based on rated capacity at 8,760 hours/year.									
Controlled Potential Emissions (tons/year)									
Emissions Generating Activity									
Pollutant	Boiler # 1 and # 2 natural gas combustion and No. 2 oil emissions	Boiler # 1 and # 2 # 2 Fuel oil combustion	Low Voltage Compounding	Lead Lines	Lead Stripper	Bunching and Stranding, CAT, and CV Lines	Others	No. 8 Rewind and Unshield Lines	TOTAL**
						HVC			
PM	0.75	2.58	0.05	36.09	0.67	0.00	0.00	0.00	39.39
PM10	3	2.58	0.05	36.09	0.67	0.00	0.00	0.00	39.81
SO2	0.24	89.76	0.00	0.00	0.00	0.00	0.00	0.00	89.76
NOx	39.42	25.80	0.00	0.00	0.00	0.00	0.00	0.00	39.42
VOC	2.17	0.44	0.00	10.30	18.40	6.30	18.66	15.50	71.33
CO	33.11	6.45	0.00	0.00	0.00	0.00	0.00	0.00	33.11
total HAPs	0.396	negl.	*	*	*	*	*	0.00	< 10.0
worst case single HAP	0.38 (hexane)	negl.	*	*	*	*	*	0.00	< 25.0
Total emissions based on rated capacity at 8,760 hours/year.									

* Sourcewide single HAP and total HAPs emissions are limited to less than 10 and 25 tons per year, respectively, to make the requirements of 326 IAC 2-7 (Part 70) not applicable.

**Boilers 1 and 2 use natural gas as the primary fuel and # 2 fuel oil as back up fuel. The total represents the worst case emissions for each pollutant.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Boiler 1 and Boiler 2

Company Name: General Cable Industries, Inc.
Address City IN Zip: 440 East 8th Street, Marion, IN 46953
FESOP No.: 053-14834-00001
Reviewer: Adeel Yousuf / EVP

Heat Input Capacity MMBtu/hr Boiler # 1	Potential Throughput MMCF/yr
48.0	420.5

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.40	1.60	0.13	21.02	1.16	17.66

Heat Input Capacity MMBtu/hr Boiler # 2	Potential Throughput MMCF/yr
42.0	367.9

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.35	1.40	0.11	18.40	1.01	15.45

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

	PM	PM10	SO2	NOx	VOC	CO
Total Potential Emissions in tons/yr	0.75	3.00	0.24	39.42	2.17	33.11

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 100
HAPs Emissions

Boiler 1 and Boiler 2

Company Name: General Cable Industries, Inc.
Address City IN Zip: 440 East 8th Street, Marion, IN 46953
FESOP No.: 053-14834-00001
Reviewer: Adeel Yousuf / EVP

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.415E-04	2.523E-04	1.577E-02	3.784E-01	7.148E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.051E-04	2.313E-04	2.943E-04	7.989E-05	4.415E-04

Methodology is the same as page 1.

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

Appendix A: Potential Emissions Calculations

No. 2 Fuel Oil Combustion Only

MM BTU/HR <100

Boiler 1 and Boiler 2

Company Name: General Cable Industries, Inc.
Address City IN Zip: 440 East 8th Street, Marion, IN 46953
FESOP No.: 053-14834-00001
Reviewer: Adeel Yousuf / EVP

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur
Boiler # 1 and # 2		
90.0	5631.4	0.49

Heat Input Capacity includes:
 one (1) 48.0 MMBtu/hr boiler and one (1) 42.0 MMBtu/hr boiler, both capable of burning natural gas or No. 2 distillate fuel oil.

	Pollutant				
	PM	SO2	NOx*	VOC	CO
Emission Factor in lb/kgal (No. 2 fuel oil combustion)	2.0	142S	20.00	0.34	5.0
Potential Emissions burning No. 2 fuel oil, tons/yr	5.63	195.92	56.31	0.96	14.08

Heat Input Capacity MMBtu/hr	Limited Throughput kgals/year	S = Weight % Sulfur
90.0	2580.00	0.49

Heat Input Capacity includes:
 one (1) 48.0 MMBtu/hr boiler and one (1) 42.0 MMBtu/hr boiler, both capable of burning natural gas or No. 2 distillate fuel oil.

	Pollutant				
	PM	SO2	NOx*	VOC	CO
Emission Factor in lb/kgal (No. 2 fuel oil combustion)	2.0	142S	20.00	0.34	5.0
Limited Emissions burning No. 2 fuel oil, tons/yr	2.58	89.76	25.80	0.44	6.45

Note:
 Limited emissions are based on a No. 2 fuel oil usage limitation of 2,580,000 gallons per year and a sulfur content limit of 0.5% by weight (based on original FESOP 053-5471-00001, issued on June 6, 1997. Natural gas usage is not limited.

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu
 Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu
 Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)
 *PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.
 Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton
 See page 2 for HAPs emission calculations.

Compliance with 326 IAC 7-1.1-2

The following calculations determine the maximum sulfur content of #2 distillate fuel allowed by 326 IAC 7-1.1-2:
 0.5 lb/MMBtu x 140,000 Btu/gal = 70 lb/1000 gal
 70 lb/1000 gal/ 142 lb/1000 gal = 0.5 %
 Sulfur content must be less than or equal to 0.5 % to comply with 326 IAC 7-1.1-2.
 Facility will comply with 326 IAC 7-1.1-2 by using fuel oil with a limited 0.50% sulfur content.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: General Cable Industries, Inc.
Address City IN Zip: 440 East 8th Street, Marion, IN 46953
FESOP No.: 053-14834-00001
Reviewer: Adeel Yousuf / EVP

HAPs - Metals

Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	1.58E-03	1.18E-03	1.18E-03	1.18E-03	3.55E-03

HAPs - Metals (continued)

Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	1.18E-03	2.37E-03	1.18E-03	5.91E-03

Methodology

Emission Factors are from AP 42, Tables 1.3-10, Supplement E 9/98

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

**Appendix A: Emission Calculations
Low Voltage Compounding**

Company Name: General Cable Industries, Inc.
Address City IN Zip: 440 East 8th Street, Marion, IN 46953
FESOP No.: 053-14834-00001
Reviewer: Adeel Yousuf / EVP

Low Voltage Compounding

Facility Description	Control Device	Control Efficiency (%)	Max. Capacity (tons/hr)	Stack ID
(a) one (1) jet zone cooler	none	0.00%	3.5	SS-31
(b) one (1) raw material bucket charging operation	baghouse	95.00%	3.5	SS-76
(c) one (1) primary Banbury mixer	baghouse	95.00%	3.5	SS-76
(d) one (1) secondary Banbury mixer	baghouse	95.00%	3.5	SS-76

Potential Emissions

A. Uncontrolled and Controlled Emissions

Pollutant	SS-31			SS-76			Total Uncontrolled Emissions (ton/yr)	Total Controlled Emissions (ton/yr)
	Emission Factor (lb/ton)	Uncontrolled Emissions (ton/yr)	Controlled Emissions (ton/yr)	Emission Factor (lb/ton)	Uncontrolled Emissions (ton/yr)	Controlled Emissions (ton/yr)		
PM *	0.0031	0.05	0.05	0.001	0.015	0.001	0.06	0.05
PM-10 *	0.0031	0.05	0.05	0.001	0.015	0.001	0.06	0.05
HAP (Pb) **	0.0031	0.05	0.05	0.001	0.015	0.001	0.06	0.05

Note: 1) Maximum Capacity is taken from the original FESOP 053-5471-00001, issued on June 6, 1997 and was provided by the source.

* Emission factors for Low Voltage Compounding are based on the stack test performed on August 27, 1999 at the facility.

** Lead (Pb) emissions from Low Voltage Compounding are equal to PM and PM10 emissions. Lead is the only HAP emitted from this operation.

Methodology:

Potential Emissions tons/yr = Emission factor (lb/ton) x maximum capacity (tons/hr) / 2000 lb/ton x 8760 hrs/yr

Appendix A: Emission Calculations

Lead Lines

Company Name: General Cable Industries, Inc.
Address City IN Zip: 440 East 8th Street, Marion, IN 46953
FESOP No.: 053-14834-00001
Reviewer: Adeel Yousuf / EVP

Lead Lines

Facility Description	Control Device	Control Efficiency (%)	Max. Capacity (tons/hr)	Stack ID
(a) North Lead Line (ID # 5) with hood	none	0.00%	3.3	SS-9 and SS-50
(b) South Lead Line (ID # 6) with hood	none	0.00%	2.1	SS-8 and SS-50

Potential Emissions

A. Uncontrolled (Before Controls)

Pollutant	North Lead Line		South Lead Line		Total Uncontrolled Emissions (ton/yr)
	Emission Factor (lb/ton)	Uncontrolled Emissions (ton/yr)	Emission Factor (lb/ton)	Uncontrolled Emissions (ton/yr)	
	PM	1.526	22.06	1.526	
PM-10	1.526	22.06	1.526	14.04	36.09
Lead	0.0102	0.15	0.0008	0.01	0.15
VOC **		10.3	n/a	n/a	10.30

Note: 1) Maximum Capacity is taken from the original FESOP 053-5471-00001, issued on June 6, 1997 and was provided by the source.

2) PM and PM10 emission factors for Lead lines are based on the stack test performed on September 1995 at the facility; same emission factors were used in original FESOP 053-5471-00001.

3) Lead (Pb) emission factors for Lead lines are based on the stack test performed on August 23, 1999 at the facility.

** VOC emissions are pro-rated by multiplying the 2001 VOC usage rate by the ratio of the design throughput capacity to the 2001 throughput rate; same technique was used in original FESOP 053-5471-00001.

Methodology:

Potential Emissions tons/yr = Emission factor (lb/ton) x maximum capacity (tons/hr) / 2000 lb/ton x 8760 hrs/yr

**Appendix A: Emission Calculations
Lead Stripper**

Company Name: General Cable Industries, Inc.
Address City IN Zip: 440 East 8th Street, Marion, IN 46953
FESOP No.: 053-14834-00001
Reviewer: Adeel Yousuf / EVP

Lead Lines

Facility Description	Control Device	Control Efficiency (%)	Max. Capacity (tons/hr)	Stack ID
One (1) lead stripper (ID # 8)	baghouse	95.00%	18	SS-51
Solvent Wash Pot	none	n/a	18	SS-52

Potential Emissions

A. Uncontrolled and Controlled Emissions

Pollutant	Stack ID (SS-51)			Stack ID (SS-52)			Total Uncontrolled Emissions (ton/yr)	Total Controlled Emissions (ton/yr)
	Emission Factor (lb/ton)	Uncontrolled Emissions (ton/yr)	Controlled Emissions (ton/yr)	Emission Factor (lb/ton)	Uncontrolled Emissions (ton/yr)	Controlled Emissions (ton/yr)		
PM	0.169	13.32	0.67	n/a	n/a	n/a	13.32	0.67
PM-10	0.169	13.32	0.67	n/a	n/a	n/a	13.32	0.67
HAP (Pb)	0.00029	0.02	0.0011	n/a	n/a	n/a	0.02	0.00
VOC **	n/a	n/a	n/a		48.30	**18.40	48.30	18.40

Note: 1) Maximum Capacity is taken from the original FESOP 053-5471-00001, issued on June 6, 1997 and was provided by the source.

2) PM and PM10 emission factors for Lead stripper are based on the stack test performed on September 1995 at the facility; same emission factors were used in original FESOP 053-5471-00001.

3) Lead (Pb) emission factor for Lead stripper is based on the stack test performed on November 9, 1999.

** VOC emissions are pro-rated by multiplying the 2001 VOC usage rate by the ratio of the design throughput capacity to the 2001 throughput rate; same technique was used in original FESOP 053-5471-00001.

** VOC emissions are emitted from an organic solvent wash pot that discharges through stack SS-52; the source limited the organic solvent usage to 18.4 tons per year to avoid the requirements of 326 IAC 8-1-6 (BACT) in original FESOP 053-5471-00001
 VOC emissions do not contain any HAPs which are emitted from the lead stripper; lead is the only HAP that is emitted.

Methodology:

Potential Emissions tons/yr = Emission factor (lb/ton) x maximum capacity (tons/hr) / 2000 lb/ton x 8760 hrs/yr

**Appendix A: Emission Calculations
Bunching and Stranding, CAT, and CV Lines**

Company Name: General Cable Industries, Inc.
Address City IN Zip: 440 East 8th Street, Marion, IN 46953
FESOP No.: 053-14834-00001
Reviewer: Adeel Yousuf / EVP

Bunching and Stranding, CAT, and CV Lines

Facility Description	Control Device	Stack ID
Stranding Lines	none	Ventilation (GV)
CAT CV Line (CV-1)	none	GV
CAT CV Line (CV-2)	none	GV
CAT CV Line (CV-3)	none	GV
No. 4 CV Line (ID # E-1c)	none	GV
No. 5 CV Line (ID # E-1d)	none	GV
No. 6 CV Line (ID # E-1e)	none	GV

Potential Emissions

A. Uncontrolled Emissions from Stranding and CV Lines

Pollutant	General Ventilation (GV)	
	Emission Factor (lb/ton)	Uncontrolled Emissions (ton/yr)
VOC/HAP **	n/a	6.3
Total		6.3

Others (Wash up and Clean up activities)

Facility Description	Control Device	Stack ID
Others (Wash up and Clean up activities)	none	General Ventilation (GV)

A. Uncontrolled Emissions from Others (Wash up and Cleaning activities)

Pollutant	General Ventilation (GV)	
	Emission Factor (lb/ton)	Uncontrolled Emissions (ton/yr)
VOC	n/a	16.3
Total		16.3

Methodology:

** VOC emissions are pro-rated by multiplying the 2001 VOC usage rate by the ratio of the design throughput capacity to the 2001 throughput rate; same technique was used in original FESOP 053-5471-00001. All the VOC emitted is considered as HAP too as a worst case scenario.

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: General Cable Industries, Inc.
Address City IN Zip: 440 East 8th Street, Marion, IN 46953
FESOP No.: 053-14834-00001
Reviewer: Adeel Yousuf / EVP

UNCONTROLLED POTENTIAL EMISSIONS

Facility / Operation	Boiler # 1 & # 2	Lead Stripper	Lead Lines	Others	Total
	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
HAP Pollutant					
Acetohpenone	0.00	0.00	0.00	3.51	3.51
Antimony	0.00	0.59	0.00	0.00	0.59
Arsenic	0.00	0.00	0.00	0.00	0.00
Beryllium	0.00	0.00	0.00	0.00	0.00
Cadmium	0.00	0.00	0.00	0.00	0.00
Chromium	0.00	0.00	0.00	0.00	0.00
Carbon tetrachloride	0.00	9.95	0.00	0.01	9.96
Chloroform	0.00	1.00	0.00	0.00	1.00
Ethyl benzene	0.00	0.00	0.00	0.31	0.31
Ethylene thiourea	0.00	1.10	0.00	0.00	1.10
Formaldehyde	0.02	0.00	0.00	0.00	0.02
Glycol Ethers	0.00	0.33	0.00	0.00	0.33
Hexane	0.38	0.00	0.00	0.00	0.38
Isophorone	0.00	0.00	0.00	0.14	0.14
Lead	0.00	0.32	0.42	0.00	0.74
Manganese	0.00	0.00	0.00	0.00	0.00
Mercury	0.00	0.00	0.00	0.00	0.00
Methanol	0.00	0.00	0.00	0.15	0.15
Methyl ethyl ketone (MEK)	0.00	0.00	0.00	0.54	0.54
Nickel	0.00	0.00	0.00	0.00	0.00
Toluene	0.00	0.00	0.00	45.49	45.49
Vinyl Acetate	0.00	0.48	0.00	0.00	0.48
Xylene	0.00	0.00	0.00	9.00	9.00
Total HAPs (tons/yr)	0.42	13.77	0.42	59.15	73.74

LIMITED POTENTIAL EMISSIONS

Facility / Operation	Boiler # 1 & # 2	Lead Stripper	Lead Lines	Others	Total
	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
HAP Pollutant					
Acetohpenone	0.00	0.00	0.00	3.51	
Antimony	0.00	0.18	0.00	0.00	
Arsenic	0.00	0.00	0.00	0.00	
Beryllium	0.00	0.00	0.00	0.00	
Cadmium	0.00	0.00	0.00	0.00	
Chromium	0.00	0.00	0.00	0.00	
Carbon tetrachloride	0.00	2.96	0.00	0.01	
Chloroform	0.00	0.30	0.00	0.00	
Ethyl benzene	0.00	0.00	0.00	0.31	
Ethylene thiourea	0.00	0.33	0.00	0.00	
Formaldehyde	0.02	0.00	0.00	0.00	< 10.0 for single HAP
Glycol Ethers	0.00	0.10	0.00	0.00	< 25.0 for total HAPs
Hexane	0.38	0.00	0.00	0.00	
Isophorone	0.00	0.00	0.00	0.14	
Lead	0.00	0.32	0.10	0.00	
Manganese	0.00	0.00	0.00	0.00	
Mercury	0.00	0.00	0.00	0.00	
Methanol	0.00	0.00	0.00	0.15	
Methyl ethyl ketone (MEK)	0.00	0.00	0.00	0.54	
Nickel	0.00	0.00	0.00	0.00	
Toluene	0.00	0.00	0.00	7.00	
Vinyl Acetate	0.00	0.48	0.00	0.00	
Xylene	0.00	0.00	0.00	7.00	
Total HAPs (tons/yr)	0.42	4.66	0.10	18.66	

Note: HAPs emissions from LVC, HVC, lead lines and others operations are taken from the original FESOP 053-5471-00001, issued on June 6, 1997.

**Appendix A: Emission Calculations
No. 8 Rewind and Unishield Lines**

Company Name: General Cable Industries, Inc.
Address City IN Zip: 440 East 8th Street, Marion, IN 46953
FESOP No.: 053-14834-00001
Reviewer: Adeel Yousuf / EVP

Lead Lines

Facility Description	Control Device	Stack ID
No. 8 Rewind Line (ID # 9a)	none	SS-64
Unishield Line (ID # 9b)	none	SS-65

Potential Emissions

A. Uncontrolled (Before Controls)

Pollutant	Stack ID (SS-64)		Stack ID (SS-65)		Total Uncontrolled Emissions (ton/yr)
	Emission Factor (lb/ton)	Potential Emissions (ton/yr)	Emission Factor (lb/ton)	Potential Emissions (ton/yr)	
PM	n/a	0.00	n/a	n/a	0.00
PM-10	n/a	0.00	n/a	n/a	0.00
HAP	n/a	0.00	n/a	n/a	0.00
VOC **	n/a	1.20	n/a	14.30	15.50

Note: ** VOC emissions are pro-rated by multiplying the 2001 VOC usage rate by the ratio of the design throughput capacity to the 2001 throughput rate; same technique was used in original FESOP 053-5471-00001.

Methodology:

Potential Emissions tons/yr = Emission factor (lb/ton) x maximum capacity (tons/hr) / 2000 lb/ton x 8760 hrs/yr