



*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.IN.gov/idem](http://www.IN.gov/idem)

**NOTICE OF 30-DAY PERIOD  
FOR PUBLIC COMMENT**

Preliminary Findings Regarding a Part 70 Operating Permit  
Significant Permit Modification

for **Phelps Dodge Magnet Wire Co.**  
in **Allen County**

**Part 70 No.: 003-6925-00013**  
**Significant Permit Modification No.: 003-16769-00013**

Notice is hereby given that the above-mentioned company, located at 4300 New Haven Avenue, Fort Wayne, Allen County, Indiana 46803, petitioned for review of the Part 70 operating permit issued on October 10, 2002. This petition was received on November 8, 2002 and was filed in the Office of Environmental Adjudication (OEA) under Cause Number 02-A-J-2973. This permit modification shows the changes made to the permit in order to settle issues raised by the petition for review. There will be no change in the emissions.

Notice is hereby given that there will be a period of thirty (30) days from the date of publication of this notice during which any interested person may comment on why this proposed permit modification should or should not be issued. Appropriate comments should be related to any air quality issues, interpretation of the state and federal rules, calculations made, technical issues, or the effect that the operation of this source would have on any aggrieved individuals. IDEM, OAQ does not have jurisdiction in specifying and implementing requirements for zoning, odor or noise. For such issues, please contact your local officials.

A copy of the application and draft source modification is available for examination at the Allen County Public Library, 2201 Sherman Boulevard, Fort Wayne, Indiana, 46803. A copy of the draft permit modification is also available for examination at [www.IN.gov/idem/air/permits](http://www.IN.gov/idem/air/permits). All statements, along with supporting documentation, should be submitted in writing to the IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015. If adverse comments concerning the **air pollution impact** of this draft source are received, together with a request for a public hearing, such a hearing may be held to give further consideration to this application.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the OAQ, at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have fifteen (15) days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

*(Continued on back)*

Phelps Dodge Magnet Wire Co.  
Fort Wayne, Indiana  
Permit Reviewer: ERG/BS

First Significant Permit Modification: 003-16769-00013  
Modified by: Mark A. Derf

Page 2 of 2  
No. T003-6925-00013

Questions should be directed Mark A. Derf, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Mark Derf or extension 3-6870, or dial (317) 233-6870.

Original Signed by Paul Dubenetzky

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

PD/mad



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

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Indianapolis, Indiana 46206-6015  
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Mr. Richard Habegger, President  
Phelps Dodge Magnet Wire Co.  
2131 S. Coliseum Boulevard  
Fort Wayne, Indiana 46803

Re: 003-16769-00013  
First Significant Permit Modification to  
Part 70 Permit No.: T003-6925-00013

Dear Mr. Habegger:

Phelps Dodge Magnet Wire Co.. (Phelps Dodge) was issued a Part 70 Operating Permit on October 10, 2002, for a magnet wire coating plant. Phelps Dodge petitioned for review of the permit on November 8, 2002. This petition was filed in the Office of Environmental Adjudication under Cause Number 02-A-J-2973. This permit revision shows the changes made to the permit in order to settle issues raised by the petition for review.

The modification consists of changes throughout the permit. This permit modification will replace the original Part 70 operating permit as it has incorporated changes which occurred as a result of the resolution to the appeal.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mark A. Derf, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Mark Derf at extension (3-6870), or dial (317) 233-6870.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
PD/mad

cc: File - Allen County  
U.S. EPA, Region V  
Allen County Health Department  
Air Compliance Section Inspector – Jennifer Dorn  
Compliance Data Section - Karen Ampil  
Administrative and Development  
Technical Support and Modeling - Michele Boner  
Office of Legal Counsel – Kathleen Mills



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**PART 70 OPERATING PERMIT  
 SIGNIFICANT PERMIT MODIFICATION  
 OFFICE OF AIR QUALITY**

**Phelps Dodge Magnet Wire Company  
 4300 New Haven Avenue  
 Fort Wayne, Indiana 46803**

(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.

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 2-7 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.: T003-6925-00013	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: October 10, 2002  Expiration Date: October 10, 2007
First Significant Permit Modification No.: T003-16769-00013	Pages Affected: Entire Permit
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:  Expiration Date: October 10, 2007

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D.2.6 Parametric Monitoring

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## **SECTION D.6 FACILITY OPERATION CONDITIONS**

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### **Compliance Determination Requirements**

- D.6.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]
- D.6.4 Thermal Oxidizer
- D.6.5 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

- D.6.6 Parametric Monitoring

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

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- D.7.2 Volatile Organic Compounds (VOC)
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- D.10.4 Volatile Organic Compounds (VOC)
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**SECTION A**

**SOURCE SUMMARY**

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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 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates magnet wire coating processes.

Responsible Official: Vice President  
Source Address: 4300 New Haven Avenue, Ft. Wayne, Indiana 46803  
Mailing Address: 2131 South Coliseum Boulevard, Ft. Wayne, Indiana 46803  
SIC Code: 3357  
County Location: Allen  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD  
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) Three (3) Quartz Fabric wire enameling ovens, installed before 1977, emission unit number 701-702, 703-704 and 705-706, with a maximum capacity of 33 pounds of magnet wire per hour each. Emissions shall be controlled by external thermal oxidizers (not integral) exhausted at Stack/Vent ID 0023.
- (b) Two (2) Quartz Fabric wire enameling ovens, installed before 1977, emission unit number 707-708 and 709-710, with a maximum capacity of 33 pounds of magnet wire per hour each. Emissions shall be controlled by external thermal oxidizers (not integral) exhausted at Stack/Vent ID 0020.
- (c) Four (4) Quartz Fabric wire enameling ovens, installed before 1977, emission unit number 804, 805, 808, and 809, with a maximum capacity of 80 pounds of magnet wire per hour each. Emissions shall be controlled by external thermal oxidizers (not integral) exhausted at Stack/Vent ID 0033.
- (d) One (1) Quartz Fabric wire enameling oven, installed before 1977, emission unit number 810, with a maximum capacity of 80 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0024.
- (e) One (1) Lepel Fabric wire enameling oven, installed before 1980, emission unit number 807, with a maximum capacity of 80 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent 0027.
- (f) One (1) Lepel Fabric wire enameling oven, installed before 1980, emission unit number 806, with a maximum capacity of 80 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent 0028.

- (g) One (1) Lepel Fabric wire enameling oven, installed before 1980, emission unit number 803, with a maximum capacity of 80 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent 0030.
- (h) One (1) Lepel Fabric wire enameling oven, installed before 1980, emission unit number 802, with a maximum capacity of 80 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent 0031.
- (i) One (1) Quartz Fabric wire enameling oven, installed 1992, emission unit number 811, with a maximum capacity of 80 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0024.
- (j) One (1) SICME ES enameling oven, installed March 1991, emission unit number 695, with a maximum capacity of 90 pounds of magnet wire per hour. Emissions shall be controlled by an internal thermal oxidizer (not integral) exhausted at Stack/Vent ID 0066.
- (k) One (1) SICME ES wire enameling oven, installed March 1991, emission unit number 690, with a maximum capacity of 90 pounds of magnet wire per hour. Emissions shall be controlled by an internal thermal oxidizer (not integral) exhausted at Stack/Vent ID 0068.
- (l) One (1) SICME ES wire enameling oven, installed March 1991, emission unit number 605, with a maximum capacity of 90 pounds of magnet wire per hour. Emissions shall be controlled by an internal thermal oxidizer (not integral) exhausted at Stack/Vent ID 0069.
- (m) One (1) SICME ES wire enameling oven, installed March 1991, emission unit number 600, with a maximum capacity of 90 pounds of magnet wire per hour. Emissions shall be controlled by an internal thermal oxidizer (not integral) exhausted at Stack/Vent ID 0071.
- (n) One (1) Square/Rectangular wire enameling oven, installed before 1980, emission unit number 610, with a maximum capacity of 66.67 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0091.
- (o) One (1) Square/Rectangular wire enameling oven, installed before 1980, emission unit number 640, with a maximum capacity of 66.67 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0113.
- (p) One (1) Square/Rectangular wire enameling oven, installed before 1980, emission unit number 620, with a maximum capacity of 66.67 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0118.
- (q) One (1) Square/Rectangular wire enameling oven, installed before 1980, emission unit number 670, with a maximum capacity of 66.67 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0122.
- (r) One (1) Square/Rectangular wire enameling oven, installed before 1980, emission unit number 680, with a maximum capacity of 66.67 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0133.
- (s) One (1) Square/Rectangular wire enameling oven, installed before 1980, emission unit number 660, with a maximum capacity of 66.67 pounds of magnet wire per hour.

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Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0140.

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- (t) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 351-352, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0172.
- (u) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 353-354, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0173.
- (v) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 355-356, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0174.
- (w) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 367-368, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0175.
- (x) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 365-366, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0176.
- (y) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 363-364, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0177.
- (z) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 373-374, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0196.
- (aa) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 371-372, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0197.
- (bb) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 369-370, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0198.
- (cc) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 357-358, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0199.
- (dd) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 359-360, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall

be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0200.

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- (ee) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 361-362, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0201.
- (ff) One (1) MAG VEL 6 wire enameling pilot oven with an integral internal catalytic oxidizer, installed November 11, 1993, and a maximum capacity of 133.33 pounds of magnet wire per hour. Emissions shall be exhausted at Stack/Vent 1041-1044.
- (gg) One (1) MAG VEL 8 wire enameling pilot oven with an integral internal catalytic oxidizer, installed November 11, 1993, and a maximum capacity of 133.33 pounds of magnet wire per hour. Emissions shall be exhausted at Stack/Vent 1048-1051.
- (hh) One (1) MAG HZ 4 wire enameling pilot oven with an integral internal catalytic oxidizer, installed November 11, 1993, and a maximum capacity of 133.33 pounds of magnet wire per hour. Emissions shall be exhausted at Stack/Vent 1053.
- (ii) One (1) applicator cleaning area, installed January 1991 consisting of tanks 1 through 7, exhausted through stacks 0299, 0300 and 0301, capacity: 150 gallons each for tanks 1 and 2, 650 gallons for tank 3, 500 gallons each for tanks 4 and 5, 400 gallons for tank 6 and 500 gallons for tank 7.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour [326 IAC 6-2-4]:
  - (1) One (1) 7.54 MMBtu natural gas fired boiler, designated as Boiler 1, installed in 1971, exhausting at Stack/Vent 0218.
  - (2) One (1) 7.54 MMBtu natural gas fired boiler, designated as Boiler 2, installed in 1971, exhausting at Stack/Vent 0222.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2].
- (c) Emergency generator as follows: Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower: One (1) Cummins 395 HP natural gas emergency generator exhausting to stack 415. This is an insignificant activity with no specifically applicable requirements. (Equipment referenced in Condition D.9.2).
- (d) One (1) MAG VEL 6 wire enameling pilot oven with an integral internal catalytic oxidizer, installed November 11, 1993, and a maximum capacity of 133.33 pounds of magnet wire per hour. Emissions shall be exhausted at Stack/Vent 1041-1044.

- (e) One (1) MAG VEL 8 wire enameling pilot oven with an integral internal catalytic oxidizer, installed November 11, 1993, and a maximum capacity of 133.33 pounds of magnet wire per hour. Emissions shall be exhausted at Stack/Vent 1048-1051.
- (f) One (1) MAG HZ 4 wire enameling pilot oven with an integral internal catalytic oxidizer, installed November 11, 1993, and a maximum capacity of 133.33 pounds of magnet wire per hour. Emissions shall be exhausted at Stack/Vent 1053

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A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

**SECTION B**

**GENERAL CONDITIONS**

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**B.1 Definitions [326 IAC 2-7-1]**

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.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the original date, 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.3 Enforceability [326 IAC 2-7-7]**

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.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

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 2-7-3 and 326 IAC 2-7-4(a).

**B.5 Severability [326 IAC 2-7-5(5)]**

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.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

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

**B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]**

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information 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 submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) 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 "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. 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.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Non compliance with any provisions of this permit grounds for:
- (1) Enforcement action;
- (2) Permit termination, revocation and reissuance, or modification; or
- (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) 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.
- (d) 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.

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B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (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 a responsible official 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) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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 Data Section, 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, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (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 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

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- (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 contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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.12 Emergency Provisions [326 IAC 2-7-16]**

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe 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 Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 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  
**(and local agency if applicable)**

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 2-7-5(3)(C)(ii) and must contain the following:

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- (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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-4-(c)(10) 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 2-7 and any other applicable rules.
- (g) 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.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable

requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

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- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.14 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) deleted
- by this permit.
- (b) All previous registrations and permits are superseded by this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), 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 not need to be included in this report.

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The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (3) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

**B.17 Permit Renewal** [326 IAC 2-7-4]

- (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 2-7-4. 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 "responsible official" as defined by 326 IAC 2-7-1(34).

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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, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

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 2-7 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 being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]**  
**[326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a 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 preconstruction approval required by 326 IAC 2-7-10.5 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 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

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- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

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, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 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 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

**SECTION C SOURCE OPERATION CONDITIONS**

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Entire Source

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

**C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate 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.

**C.2 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.3 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

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

**C.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

Except as otherwise provided by statute or 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.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 14-10-4, 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) 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 that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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### Testing Requirements [326 IAC 2-7-6(1)]

#### C.8 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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 source 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.9 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. 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 2-7-5(1)] [326 IAC 2-7-6(1)]

#### C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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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.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (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 ( ± 2%) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, the instrument 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 ( ± 2%) of full scale reading.
- (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.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on February 27, 1998.

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- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or  
(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's 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 timeframe 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, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the

applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

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- (4) Failure to take reasonable response steps shall constitute a violation of 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 a minor permit modification 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 2-7-16 (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 2-7-5]  
[326 IAC 2-7-6]

- (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 documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

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**C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-15(c)] [326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

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

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement 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.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

- (a) Records of all required data, reports and support information 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 kept 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.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

- (a) The source 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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

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- (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, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### C.21 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**

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**Facility Description [326 IAC 2-7-5(15)]:**

- (a) Three (3) Quartz Fabric wire enameling ovens, installed before 1977, emission unit number 701-702, 703-704 and 705-706, with a maximum capacity of 33 pounds of magnet wire per hour each. Emissions shall be controlled by external thermal oxidizers (not integral) exhausted at Stack/Vent ID 0023.
- (b) Two (2) Quartz Fabric wire enameling ovens, installed before 1977, emission unit number 707-708 and 709-710, with a maximum capacity of 33 pounds of magnet wire per hour each. Emissions shall be controlled by external thermal oxidizers (not integral) exhausted at Stack/Vent ID 0020.
- (c) Four (4) Quartz Fabric wire enameling ovens, installed before 1977, emission unit number 804, 805, 808, and 809, with a maximum capacity of 80 pounds of magnet wire per hour each. Emissions shall be controlled by external thermal oxidizers (not integral) exhausted at Stack/Vent ID 0033.
- (d) One (1) Quartz Fabric wire enameling oven, installed before 1977, emission unit number 810, with a maximum capacity of 80 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0024.

(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 2-7-5(1)]**

**D.1.1 Volatile Organic Compound (VOC)**

- (a) Pursuant to 326 IAC 8-6 (Organic Solvent Emission Limitations), the VOC emitted from the ten (10) Quartz Fabric wire enameling ovens, emission units 701-702, 703-704, 705-706, 707-708, 709-710, 804, 805, 808, 809 and 810, shall be reduced by at least eighty-five percent (85%).
- (b) Any change or modification which may increase potential emissions from the ten (10) Quartz Fabric wire enameling ovens shall require prior approval from the OAQ before such change may occur.

**D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]**

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizers to achieve compliance with Condition D.1.1.

**D.1.4 Thermal Oxidizer Operation**

- (a) Pursuant to the Construction Permit issued on October 17, 1997 (CP 003-8609-00013), the thermal oxidizers shall operate at all times that the ten (10) Quartz Fabric ovens are in operation. When operating, the thermal oxidizers shall maintain a minimum operating temperature of 1,150 degrees Fahrenheit or a temperature determined in the latest

compliance testing to maintain a destruction efficiency of not less than ninety percent (90%) of volatile organic compound (VOC) in order to demonstrate compliance with Conditions D.1.1 and D.1.3.

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- (b) The Permittee shall determine the temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.1, as approved by IDEM.
- (c) In order to satisfy the requirements of 326 IAC 8-6 and Condition D.1.1, the external thermal oxidizers must operate with a minimum destruction efficiency of ninety percent (90%) and a minimum capture efficiency such that the overall control efficiency is at least eighty-five percent (85%).

#### D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.1.1, within fifty (50) months after issuance of this permit, the Permittee shall conduct performance tests to verify VOC control efficiency as per Condition D.1.3 for the thermal oxidizers using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6-3.
- (b) One representative thermal oxidizer from the two oxidizers controlling the ten (10) Quartz Fabric enamel ovens shall be tested. The thermal oxidizer tested shall be the oxidizer in which the longest amount of time has elapsed since its previous test. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (c) Additionally, if the temperature falls below the 1,150°F required minimum temperature it will be considered a violation unless the Permittee performs VOC testing utilizing methods as approved by the Commissioner to ensure compliance with the 90% overall control efficiency.

#### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

##### D.1.6 Parametric Monitoring

- (a) Compliance with the 1,150°F minimum temperature will be monitored by computer collected data generated continuously. The continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature.
- (b) Eight-hour average temperatures will be made available to IDEM upon request and one-hour average temperature records will be made available within five business days from request.
- (c) The temperatures will be reported based on an eight-hour average.
- (d) The oxidizer shall operate with a five (5) degree buffer such that if the eight hour average temperature falls within five (5) degrees of the minimum required temperature, corrective action shall be performed and one-hour average temperatures shall be investigated to determine if any temperature fell below the actual minimum temperature. If a one-hour average temperature is less than the established minimum temperature, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

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**D.1.7 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.1 and D.1.6, the Permittee shall maintain:
- (1) Records of the VOC emitted based on:  $\text{VOC delivered to the applicators} \times (1 - \% \text{ overall efficiency}/100) + \text{VOC in cleaning solvent}$ .
  - (2) Records of computer collected data.
- (b) All records shall be maintained in accordance with Section C- General Record Keeping Requirements of this permit.

**SECTION D.2 FACILITY OPERATION CONDITIONS**

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**Facility Description [326 IAC 2-7-5(15)]:**

- (e) One (1) Lepel Fabric wire enameling oven, installed before 1980, emission unit number 807, with a maximum capacity of 80 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent 0027.
- (f) One (1) Lepel Fabric wire enameling oven, installed before 1980, emission unit number 806, with a maximum capacity of 80 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent 0028.
- (g) One (1) Lepel Fabric wire enameling oven, installed before 1980, emission unit number 803, with a maximum capacity of 80 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent 0030.
- (h) One (1) Lepel Fabric wire enameling oven, installed before 1980, emission unit number 802, with a maximum capacity of 80 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent 0031.

(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 2-7-5(1)]**

**D.2.1 Volatile Organic Compound (VOC)**

- (a) Pursuant to 326 IAC 8-6 (Organic Solvent Emission Limitations), the VOC emitted from the four (4) Lepel Fabric wire enameling ovens, emission units 807, 806, 803 and 802 shall be reduced by at least eighty-five percent (85%).
- (b) Any change or modification which may increase potential emissions from the four (4) Lepel Fabric wire enameling ovens shall require prior approval from the OAQ before such change may occur.

**D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]**

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizers to achieve compliance with Condition D.2.1.

**D.2.4 Thermal Oxidizer Operation**

- (a) Pursuant to the Construction Permit issued on October 17, 1997 (CP 003-8609-00013), the external thermal oxidizers shall operate at all times that the four (4) Lepel Fabric ovens are in operation. When operating, the external thermal oxidizers shall maintain a minimum operating temperature of 1,150 degrees Fahrenheit or a temperature determined in the latest compliance testing to maintain a destruction efficiency of not less than ninety percent (90%) of volatile organic compound (VOC) captured in order to demonstrate compliance with conditions D.2.1 and D.2.3.

- (b) The Permittee shall determine the temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.2.1, as approved by AEL
- (c) In order to ensure compliance with Condition D.2.1 and (a) above, the external thermal oxidizers must operate with a minimum destruction efficiency of ninety percent (90%) and a minimum capture efficiency such that the overall control efficiency is at least eighty-five percent (85%).

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**D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

- (a) In order to demonstrate compliance with Condition D.2.1, within fifty (50) months after issuance of this permit, the Permittee shall conduct performance tests to verify VOC control efficiency as per Condition D.2.3 for thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6-3.
- (b) One representative oven from the four (4) Lepel Quartz Fabric enamel ovens shall be tested. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (c) Additionally, if the temperature falls below the 1,150°F required minimum temperature it will be considered a violation unless the Permittee performs VOC testing utilizing methods as approved by the Commissioner to ensure compliance with the 90% overall control efficiency.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.2.6 Parametric Monitoring**

- (a) Compliance with the 1,150°F minimum temperature will be monitored by computer collected data generated continuously. The continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature.
- (b) Eight-hour average temperatures will be made available to IDEM upon request and one-hour average temperature records will be made available within five business days from request.
- (c) The temperatures will be reported based on an eight-hour average.
- (d) The oxidizer shall operate with a five (5) degree buffer such that if the eight hour average temperature falls within five (5) degrees of the minimum required temperature, corrective action shall be performed and one-hour average temperatures shall be investigated to determine if any temperature fell below the actual minimum temperature. If a one-hour average temperature is less than the established minimum temperature, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

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**D.2.7 Record Keeping Requirements**

- (a) To document compliance with Condition D.2.1 and D.2.6, the Permittee shall maintain:
- (1) Records of the VOC emitted based on:  $\text{VOC delivered to the applicators} \times (1 - \% \text{ overall efficiency}/100) + \text{VOC in cleaning solvent}$ .
  - (2) Records of computer collected data.
- (b) All records shall be maintained in accordance with Section C- General Record Keeping Requirements of this permit.

**SECTION D.3 FACILITY OPERATION CONDITIONS**

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**Facility Description [326 IAC 2-7-5(15)]:**

- (i) One (1) Quartz Fabric wire enameling oven, installed 1992, emission unit number 811, with a maximum capacity of 80 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0024.

(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 2-7-5(1)]**

**D.3.1 Volatile Organic Compounds [326 IAC 8-2-8]**

- (a) Pursuant to 326 IAC 8-2-8 (Magnet Wire Coating Operations) and CP 003-8609-00013 issued on October 17, 1997, the owner or operator shall not allow the discharge into the atmosphere of VOC in excess of 1.7 pounds VOC per gallon of coating, excluding water, as delivered to the applicator.
- (b) The equivalent pounds of VOC per gallon of coating solids (as applied) shall be limited to less than 2.21, when L is equal to 1.7 pounds of VOC per gallon of coating and D is equal to 7.36 pounds of VOC per gallon of coating.
- (c) Pursuant to 326 IAC 8-1-2 (b), the enameling oven's VOC emission shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

- L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating
- D= Density of VOC in coating in pounds per gallon of VOC
- E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied

Actual solvent density shall be used to determine compliance of surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (d) Pursuant to 326 IAC 8-1-2(c), the equivalent overall control efficiency of the thermal oxidizer shall be no less than 91.1% or the required destruction efficiency demonstrated by the most recent stack testing, calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and

- procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall control efficiency of the capture system and control device as a percentage.

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#### D.3.2 PSD Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 003-8609-00013 issued on October 17, 1997, the VOC emissions from the Quartz Fabric oven (emission unit 811)(Section D.3) and the applicator cleaning area (Section D.9) shall be limited to less than 40 tons VOC per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

#### D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### **Compliance Determination Requirements**

#### D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to CP 003-8609-00013, issued October 17, 1997 and 326 IAC 8-1-2(a), the Permittee shall operate the external thermal oxidizer to achieve compliance with Conditions D.3.1 and D.3.2.

#### D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Conditions D.3.1 and D.3.2, within fifty (50) months after issuance of this permit, the Permittee shall conduct performance tests to verify VOC control efficiency as per Conditions D.3.1 for thermal oxidizers using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6-3.
- (b) Additionally, if the temperature falls below the 1,150°F required minimum temperature it will be considered a violation unless the Permittee performs VOC testing utilizing methods as approved by the Commissioner to ensure compliance with the 91.1% overall control efficiency.

#### D.3.6 VOC Emissions

Compliance with Condition D.3.2 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at VOC emission for 12 consecutive months period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

$$\text{VOC emitted} = [(\text{VOC input}) \times (100 - \% \text{control efficiency})] + [\text{uncontrolled VOC input}]$$

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### D.3.7 Thermal Oxidizer

- (a) From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature of 1,150 degrees Fahrenheit.
- (b) The Permittee shall determine the temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.3.1 and D.3.2, as approved by IDEM.

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- (c) From the date of the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature as observed during the compliant stack test.

#### D.3.8 Parametric Monitoring

- (a) Compliance with the 1,150°F minimum temperature will be monitored by computer collected data generated continuously. The continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature.
- (b) Eight-hour average temperatures will be made available to IDEM upon request and one-hour average temperature records will be made available within five business days from request.
- (c) The temperatures will be reported based on an eight-hour average.
- (d) The oxidizer shall operate with a five (5) degree buffer such that if the eight hour average temperature falls within five (5) degrees of the minimum required temperature, corrective action shall be performed and one-hour average temperatures shall be investigated to determine if any temperature fell below the actual minimum temperature. If a one-hour average temperature is less than the established minimum temperature, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.3.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits and/or the VOC emission limits established in Conditions D.3.1 and D.3.2.
- (1) The VOC content of each coating material and solvent used less water.
- (2) The amount of coating material and solvent used on a monthly basis.
- (A) Records shall include purchase orders and invoices as maintained in the Business Production Control System (BPCS) in conjunction with material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The monthly cleanup solvent usage for sources listed under D.3 and D.9 of this permit.
- (4) The total VOC usage for each month.
- (5) The VOC emitted based on: VOC delivered to the applicators x (1 - % overall efficiency/100) + VOC in cleaning solvent.

- (b) To document compliance with Condition D.3.8, the Permittee shall maintain records of computer collected data.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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#### D.3.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.3.2 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 "responsible official" as defined by 326 IAC 2-7-1(34).

**SECTION D.4**

**FACILITY OPERATION CONDITIONS**

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**Facility Description [326 IAC 2-7-5(15)]:**

- (j) One (1) SICME ES enameling oven, installed March 1991, emission unit number 695, with a maximum capacity of 90 pounds of magnet wire per hour. Emissions shall be controlled by an internal thermal oxidizer (not integral) exhausted at Stack/Vent ID 0066.
- (k) One (1) SICME ES wire enameling oven, installed March 1991, emission unit number 690, with a maximum capacity of 90 pounds of magnet wire per hour. Emissions shall be controlled by an internal thermal oxidizer (not integral) exhausted at Stack/Vent ID 0068.
- (l) One (1) SICME ES wire enameling oven, installed March 1991, emission unit number 605, with a maximum capacity of 90 pounds of magnet wire per hour. Emissions shall be controlled by an internal thermal oxidizer (not integral) exhausted at Stack/Vent ID 0069.
- (m) One (1) SICME ES wire enameling oven, installed March 1991, emission unit number 600, with a maximum capacity of 90 pounds of magnet wire per hour. Emissions shall be controlled by an internal thermal oxidizer (not integral) exhausted at Stack/Vent ID 0071.

(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 2-7-5(1)]**

**D.4.1 Volatile Organic Compounds [326 IAC 8-2-8]**

- (a) Pursuant to 326 IAC 8-2-8 (Magnet Wire Coating Operations), and CP 003-6199-00013 issued on February 11, 1997, the owner or operator shall not allow the discharge into the atmosphere of VOC in excess of 1.7 pounds VOC per gallon of coating, excluding water, as delivered to the applicator.
- (b) The equivalent pounds of VOC per gallon of coating solids (as applied) shall be limited to less than 2.21, when L is equal to 1.7 pounds of VOC per gallon of coating and D is equal to 7.36 pounds of VOC per gallon of coating.
- (c) Pursuant to 326 IAC 8-1-2 (b), the enameling ovens' VOC emission shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

- L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating
- D= Density of VOC in coating in pounds per gallon of VOC
- E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied

Actual solvent density shall be used to determine compliance of surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (d) Pursuant to 326 IAC 8-1-2(c), the equivalent overall control efficiency of the thermal oxidizers shall be no less than 96.7% or the required destruction efficiency demonstrated by the most recent stack testing, calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall control efficiency of the capture system and control device as a percentage.

#### D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### **Compliance Determination Requirements**

#### D.4.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to CP 003-8609-00013, issued October 17, 1997 and 326 IAC 8-1-2(a), the Permittee shall operate the internal thermal oxidizers to achieve compliance with Condition D.4.1.

#### D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.4.1, within fifty (50) months after issuance of this permit, the Permittee shall conduct performance tests to verify VOC control efficiency as per Condition D.4.1 for thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6-3.
- (b) One representative oven from the four (4) SICME ES enamel ovens shall be tested. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (c) Additionally, if the temperature falls below the 1,400°F required minimum temperature it will be considered a violation unless the Permittee performs VOC testing utilizing methods as approved by the Commissioner to ensure compliance with the 96.7% overall control efficiency.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### D.4.5 Thermal Oxidizer

- (a) From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizers at or above the hourly average temperature of 1,400 degrees Fahrenheit.
- (b) The Permittee shall determine the temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.4.1, as approved by IDEM.

- (c) From the date of the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature as observed during the compliant stack test.

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#### D.4.6 Parametric Monitoring

- (a) Compliance with the 1,400°F minimum temperature will be monitored by computer collected data generated continuously. The continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature.
- (b) Eight-hour average temperatures will be made available to IDEM upon request and one-hour average temperature records will be made available within five business days from request.
- (c) The temperatures will be reported based on an eight-hour average.
- (d) The oxidizer shall operate with a five (5) degree buffer such that if the eight hour average temperature falls within five (5) degrees of the minimum required temperature, corrective action shall be performed and one-hour average temperatures shall be investigated to determine if any temperature fell below the actual minimum temperature. If a one-hour average temperature is less than the established minimum temperature, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.4.7 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits and/or the VOC emission limits established in Conditions D.4.1
- (1) The VOC content of each coating material and solvent used less water.
- (2) The amount of coating material and solvent used on a monthly basis.
- (A) Records shall include purchase orders and invoices as maintained in the Business Production Control System (BPCS) in conjunction with material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The monthly cleanup solvent usage.
- (4) The total VOC usage for each month.
- (5) The VOC emitted (in tons per year) based on:  $VOC\ delivered \times (1 - \% \text{ overall efficiency}/100) + VOC\ in\ cleaning\ solvent$ .
- (b) To document compliance with Condition D.4.6, the Permittee shall maintain records of computer collected data.

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

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**SECTION D.5 FACILITY CONDITIONS**

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**Facility Description [326 IAC 2-7-5(15)]**

- (n) One (1) Square/Rectangular wire enameling oven, installed before 1980, emission unit number 610, with a maximum capacity of 66.67 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0091.
- (o) One (1) Square/Rectangular wire enameling oven, installed before 1980, emission unit number 640, with a maximum capacity of 66.67 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0113.
- (p) One (1) Square/Rectangular wire enameling oven, installed before 1980, emission unit number 620, with a maximum capacity of 66.67 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0118.
- (q) One (1) Square/Rectangular wire enameling oven, installed before 1980, emission unit number 670, with a maximum capacity of 66.67 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0122.
- (r) One (1) Square/Rectangular wire enameling oven, installed before 1980, emission unit number 680, with a maximum capacity of 66.67 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0133.
- (s) One (1) Square/Rectangular wire enameling oven, installed before 1980, emission unit number 660, with a maximum capacity of 66.67 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0140.

(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 2-7-5(1)]**

**D.5.1 Volatile Organic Compound (VOC)**

- (a) Pursuant to 326 IAC 8-6 (Organic Solvent Emission Limitations), the VOC emitted from the six (6) Square/Rectangular wire enameling ovens, emission units 610, 640, 620 670, 680 and 660 shall be reduced by at least eighty-five percent (85%).
- (b) Any change or modification which may increase potential emissions from the six (6) Square/Rectangular wire enameling ovens shall require prior approval from the OAQ before such change may occur.

**D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.5.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]**

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizers to achieve compliance with Condition D.5.1.

#### D.5.4 Thermal Oxidizer Operation

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To ensure compliance with Condition D.5.1, the external thermal oxidizers shall operate at all times that the six (6) square/rectangular ovens are in operation. When operating, the external thermal oxidizers shall maintain a minimum operating temperature of 1,150 degrees Fahrenheit or a temperature determined in the compliance testing to maintain a volatile organic compound (VOC) overall control efficiency of not less than eighty-five percent (85%) in order to demonstrate compliance with conditions D.5.1 and D.5.3.

#### D.5.5 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.5.1, within fifty (50) months after issuance of this permit, the Permittee shall conduct performance tests to verify VOC control efficiency as per Condition D.5.3 for thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6-3.
- (b) One representative oven from the six (6) Square/Rectangular enamel ovens shall be tested. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (c) Additionally, if the temperature falls below the 1,100°F required minimum temperature it will be considered a violation unless the Permittee performs VOC testing utilizing methods as approved by the Commissioner to ensure compliance with the 85% overall control efficiency.

#### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

##### D.5.6 Parametric Monitoring

- (a) Compliance with the 1,100°F minimum temperature will be monitored by computer collected data generated continuously. The continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature.
- (b) Eight-hour average temperatures will be made available to IDEM upon request and one-hour average temperature records will be made available within five business days from request.
- (c) The temperature will be reported based on an eight-hour average.
- (d) The oxidizer shall operate with a five (5) degree buffer such that if the eight hour average temperature falls within five (5) degree of the minimum required temperature, corrective action shall be performed and one-hour average temperatures shall be investigated to determine if any temperature fell below the actual minimum temperature. If a one-hour average temperature is less than the established minimum temperature, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

#### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

##### D.5.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.5.1 and D.5.6, the Permittee shall maintain:

- (1) Records of the VOC emitted based on:  $\text{VOC delivered to the applicators} \times (1 - \% \text{ overall efficiency}/100) + \text{VOC in cleaning solvent.}$
- (2) Records of computer collected data.
- (b) All records shall be maintained in accordance with Section C- General Record Keeping Requirements of this permit.

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**SECTION D.6**

**FACILITY OPERATION CONDITIONS**

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**Facility Description [326 IAC 2-7-5(15)]**

- (t) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 351-352, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0172.
- (u) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 353-354, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0173.
- (v) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 355-356, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0174.
- (w) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 367-368, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0175.
- (x) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 365-366, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0176.
- (y) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 363-364, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0177.
- (z) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 373-374, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0196.
- (aa) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 371-372, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0197.
- (bb) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 369-370, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0198.
- (cc) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 357-358, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0199.
- (dd) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 359-360, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0200.
- (ee) One (1) MOCO wire enameling oven, installed before 1980, emission unit number 361-362, with a maximum capacity of 33.33 pounds of magnet wire per hour. Emissions shall be controlled by an external thermal oxidizer (not integral) exhausted at Stack/Vent ID 0201.

(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 2-7-5(1)]

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### D.6.1 Volatile Organic Compound (VOC)

- (a) Pursuant to 326 IAC 8-6 (Organic Solvent Emission Limitations), the VOC emitted from the twelve (12) MOCO wire enameling ovens, emission units 351-352, 353-354, 355-356, 367-368, 365-366, 363-364, 373-374, 371-372, 369-370, 357-358, 359-360, and 361-362 shall be reduced by at least eighty-five percent (85%).
- (b) Any change or modification which may increase potential emissions from the twelve (12) MOCO wire enameling ovens shall require prior approval from the OAQ before such change may occur.

### D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

## Compliance Determination Requirements

### D.6.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizers to achieve compliance with Condition D.6.1.

### D.6.4 Thermal Oxidizer

- (a) In order to satisfy the requirements of 326 IAC 8-6, the external thermal oxidizers must operate such that the overall control efficiency is at least eighty-five percent (85%).
- (b) To ensure compliance with Condition D.6.1, the external thermal oxidizers shall operate at all times that the twelve (12) MOCO enamel ovens are in operation. When operating, the external thermal oxidizers shall maintain a minimum operating temperature of 1,150 degrees Fahrenheit or a temperature determined in the latest compliance testing to maintain a volatile organic compound (VOC) overall control efficiency of not less than eighty-five percent (85%).

### D.6.5 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.6.1, within fifty (50) months after issuance of this permit, the Permittee shall conduct performance tests to verify VOC control efficiency as per Condition D.6.3 for thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6-3.
- (b) One representative oven from the twelve (12) MOCO enamel ovens shall be tested. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (c) Additionally, if the temperature falls below the 1,100°F required minimum temperature it will be considered a violation unless the Permittee performs VOC testing utilizing methods as approved by the Commissioner to ensure compliance with the 85% overall control efficiency.

## Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

### D.6.6 Parametric Monitoring

- (a) Compliance with the 1,100°F minimum temperature will be monitored by computer collected data generated continuously. The continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating

temperature.

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- (b) Eight-hour average temperatures will be made available to IDEM upon request and one-hour average temperature records will be made available within five business days from request.
- (c) The temperature will be reported based on an eight-hour average.
- (d) The oxidizer shall operate with a five (5) degree buffer such that if the eight hour average temperature falls within five (5) degree of the minimum required temperature, corrective action shall be performed and one-hour average temperatures shall be investigated to determine if any temperature fell below the actual minimum temperature. If a one-hour average temperature is less than the established minimum temperature, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.6.7 Record Keeping Requirements**

- (a) To document compliance with Conditions D.6.1 and D.6.6, the Permittee shall maintain:
  - (1) Records of the VOC emitted based on:  $\text{VOC delivered to the applicators} \times (1 - \% \text{ overall efficiency}/100) + \text{VOC in cleaning solvent}$ .
  - (2) Records of computer collected data.
- (b) All records shall be maintained in accordance with Section C- General Record Keeping Requirements of this permit.

## SECTION D.7

## FACILITY OPERATION CONDITIONS

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### Facility Description [326 IAC 2-7-5(15)]:

- (II) One (1) applicator cleaning area, installed January 1991 consisting of tanks 1 through 7, exhausted through stacks 0299, 0300 and 0301, capacity: 150 gallons each for tanks 1 and 2, 650 gallons for tank 3, 500 gallons each for tanks 4 and 5, 400 gallons for tank 6 and 500 gallons for tank 7.

(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 2-7-5(1)]

#### D.7.1 PSD Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 003-8609-00013 issued on October 17, 1997, the VOC emissions from the Quartz Fabric oven (emission unit 811)(Section D.3) and the applicator cleaning area (Section D.9) shall be limited to less than 40 tons per twelve (12) consecutive months of VOC. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

#### D.7.2 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaner operations constructed after January 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.7.3 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility construction of which commenced after July 1, 1990 shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch measured at thirty-eight degrees Celsius (38<sup>o</sup>C) (one hundred degrees Fahrenheit (100<sup>o</sup>F)));
    - (B) The solvent is agitated; or

(C) The solvent is heated.

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- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
- (B) A water cover when solvent is used is insoluble in, and heavier than, water.
- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

## Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

### D.7.4 Record Keeping Requirements

- (a) To document compliance with Condition D.7.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.7.1.
- (1) The VOC content of each coating material and solvent used less water.

- (2) The amount of coating material and solvent used on a monthly basis.
- (a) Records shall include purchase order and invoices as maintained in the Business Production Control System (BPCS) in conjunction with material safety data sheets (MSDS) necessary to verify the type and amount used.
- (b) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The monthly cleanup solvent usage for sources listed under D.3 and D.9 of this permit.
- (4) The total VOC usage for each month;
- (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C- General Record Keeping Requirements, of this permit.

#### D.7.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.7.1 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 "responsible official" as defined by 326 IAC 2-7-1(34).

**SECTION D.8**

**FACILITY OPERATION CONDITIONS**

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**Facility Description [326 IAC 2-7-5(15)]:**

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour [326 IAC 6-2-4]:
  - (1) One (1) 7.54 MMBtu natural gas fired boiler, designated as Boiler 1, installed in 1971, exhausting at Stack/Vent 0218.
  - (2) One (1) 7.54 MMBtu natural gas fired boiler, designated as Boiler 2, installed in 1971, exhausting at Stack/Vent 0222.

(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 2-7-5(1)]**

**D.8.1 Particulate Matter (PM) [326 IAC 6-2-3]**

Pursuant to 326 IAC 6-2-3(d) (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions from each boiler shall be limited to 0.80 pounds per MMBtu heat input.

**SECTION D.9**

**FACILITY OPERATION CONDITIONS**

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**Facility Description [326 IAC 2-7-5(15)]:**

- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(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 2-7-5(1)]**

**D.9.1 Particulate Matter (PM) [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate for each of the manufacturing activities shall not exceed allowable PM emission rate based on 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

**SECTION D.10**

**FACILITY OPERATION CONDITIONS**

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**Facility Description [326 IAC 2-7-5(15)]:** Insignificant Activities

- (ff) One (1) MAG VEL 6 wire enameling pilot oven with an integral internal catalytic oxidizer, installed November 11, 1993, and a maximum capacity of 133.33 pounds of magnet wire per hour. Emissions shall be exhausted at Stack/Vent 1041-1044.
- (gg) One (1) MAG VEL 8 wire enameling pilot oven with an integral internal catalytic oxidizer, installed November 11, 1993, and a maximum capacity of 133.33 pounds of magnet wire per hour. Emissions shall be exhausted at Stack/Vent 1048-1051.
- (hh) One (1) MAG HZ 4 wire enameling pilot oven with an integral internal catalytic oxidizer, installed November 11, 1993, and a maximum capacity of 133.33 pounds of magnet wire per hour. Emissions shall be exhausted at Stack/Vent 1053.

(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 2-7-5(1)]**

**D.10.1 Volatile Organic Compounds [326 IAC 8-2-8]**

- (a) Pursuant to 326 IAC 8-2-8 (Magnet Wire Coating Operations) and CP 003-3268-00013 issued on February 2, 1994, the owner or operator shall not allow the discharge into the atmosphere of VOC in excess of 1.7 pounds VOC per gallon of coating, excluding water, as delivered to the applicator.
- (b) The equivalent pounds of VOC per gallon of coating solids (as applied) shall be limited to less than 2.21, when L is equal to 1.7 pounds of VOC per gallon of coating and D is equal to 7.36 pounds of VOC per gallon of coating.
- (c) Pursuant to 326 IAC 8-1-2 (b), the enameling oven's VOC emission shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

- L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating
- D= Density of VOC in coating in pounds per gallon of VOC
- E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied

Actual solvent density shall be used to determine compliance of surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (c) Pursuant to 326 IAC 8-1-2(c), the equivalent overall control efficiency of the thermal oxidizer shall be no less than 94.8% or the required destruction efficiency demonstrated by the most recent stack testing, calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

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- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall control efficiency of the capture system and control device as a percentage.

#### D.10.2 Volatile Organic Compounds

Pursuant to the Registration issued on February 2, 1994, (CP-003-3268-0013), the emissions of VOC from the three (3) ovens are limited to a total of 25 tons per year or less.

#### D.10.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### **Compliance Determination Requirements**

#### D.10.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to CP 003-3268-00013, issued on February 2, 1994 and 326 IAC 8-1-2(a), the Permittee shall operate the internal catalytic oxidizers to achieve compliance with Conditions D.10.1 and D.10.2.

#### D.10.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.10.1, within twenty-four (24) months after issuance of this permit, the Permittee shall conduct performance tests to verify VOC control efficiency as per Condition D.10.1 for catalytic oxidizers using methods approved by the Commissioner. Testing shall also be conducted every twenty-four (24) months after this first test. Stack testing shall be performed in accordance with 326 IAC 3-6-3.
- (b) One representative catalytic oxidizer from the three (3) wire enameling pilot ovens shall be tested. The catalytic oxidizer tested shall be the oven with the oldest catalyst life that has not been tested since the issuance of this permit. Oldest catalyst refers to the longest serving catalyst since last activation.
- (c) Within twelve (12) months of issuance of this permit and every twelve (12) months thereafter, the Permittee shall inspect the catalyst from each oven to check for channeling, abrasion, settling or fouling. If the catalyst is inactive while in the catalytic oxidizer for twelve (12) months or longer, the Permittee shall conduct a catalyst activity analysis. Catalysts with percent activity less than the catalyst activity of the oldest catalyst must be replaced or a stack test must be conducted to show that a 94.8% overall control efficiency is being achieved.
- (d) Additionally, if the temperature falls below the 1,076°F required minimum temperature it will be considered a violation unless the Permittee performs VOC testing utilizing methods as approved by the Commissioner to ensure compliance with the 94.8% overall control efficiency.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

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**D.10.6 Catalytic Oxidizer**

- (a) From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the catalytic oxidizer at or above the hourly average temperature of 1,076 degrees Fahrenheit.
- (b) The Permittee shall determine the temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.12.1 and D.12.2, as approved by IDEM.
- (c) From the date of the approved stack test results are available, the Permittee shall operate the catalytic oxidizers at or above the hourly average temperature as observed during the compliant stack test.

**D.10.7 Parametric Monitoring**

- (a) Compliance with the 1,076EF minimum temperature will be monitored by computer collected data generated continuously. The continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature.
- (b) Eight-hour average temperatures will be made available to IDEM upon request and one-hour average temperature records will be made available within five business days from request.
- (c) The temperatures will be reported based on an eight-hour average.
- (d) The oxidizers shall operate with a five (5) degree buffer such that if the eight hour average temperature falls within five (5) degrees of the minimum required temperature, corrective action shall be performed and one-hour average temperatures shall be investigated to determine if any temperature fell below the actual minimum temperature.
- (e) If a one-hour average temperature is less than the established minimum temperature, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

**D.10.8 Catalyst Replacement Inspection**

Each year, upon issuance of this permit, the Permit shall either:

- a) The catalysts shall be replaced a minimum of every twenty-four (24) months provided that the catalytic oxidizers are achieving the required overall control efficiency. Inspect the primary catalyst on each oven once per year. If there are indications of excess fouling or excess catalyst degradation, the Permittee must test catalyst activity or replace the catalyst,  
  
or,
- b) perform an annual 10-minute test of the oven exhaust stack gases using EPA Method 25A for each magnet wire coating machine equipped with a catalytic oxidizer. This test

must be performed under steady state operating conditions similar to those at which the last destruction efficiency test for either the specific magnet wire coating machine or a representative magnet wire coating machine was conducted. If the average exhaust stack gas concentration during an annual test is greater than the operating limit and the required destruction efficiency established from the results of the most recent compliance test, this will be an exceedance of the operating limit for that catalytic oxidizer. If an exceedance is found during the annual 10-minute test of the oven exhaust stack gases, the catalyst bed or other corrective action consistent with the manufacturer's recommendations must be taken.

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## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.10.9 Record Keeping Requirements**

- (a) To document compliance with Conditions D.10.1 and D.10.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits and/or the VOC emission limits established in Conditions D.10.1 and D.10.2.
- (1) The VOC content of each coating material and solvent used less water.
  - (2) The amount of coating material and solvent used on a monthly basis.
    - (a) Records shall include purchase orders and invoices as maintained in the Business Production Control System (BPCS) in conjunction with material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (b) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The monthly cleanup solvent usage.
  - (4) The total VOC usage for each month.
  - (5) The VOC emitted based on:  $VOC \text{ delivered to the applicators} \times (1 - \% \text{ overall efficiency}/100) + VOC \text{ in cleaning solvent}$ .
- (b) To document compliance with Condition D.10.7, the Permittee shall maintain records of the computer collected data.
- (c) To document compliance with Condition D.10.8, the Permittee shall maintain records of the catalyst replacement.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**DRAFT**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Phelps Dodge Magnet Wire Company  
Source Address: 4300 New Haven Avenue, Fort Wayne, In 46803  
Mailing Address: 2131 South Coliseum Boulevard, Fort Wayne, In 46803  
Part 70 Permit No.: T003-6925-00013

**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) \_\_\_\_\_
- 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**

**DRAFT**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Phelps Dodge Magnet Wire Company  
Source Address: 4300 New Haven Avenue, Fort Wayne, In 46803  
Mailing Address: 2131 South Coliseum Boulevard, Fort Wayne, In 46803  
Part 70 Permit No.: T003-6925-00013

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C 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
  - C The Permittee must submit notice in writing or by facsimile within two (2) 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  
**DRAFT**

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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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**

DRAFT

**Part 70 Quarterly Report**

Source Name: Phelps Dodge Magnet Wire Company  
 Source Address: 4300 New Haven Avenue, Fort Wayne, Indiana 46803  
 Mailing Address: 2131 S. Coliseum Blvd., Fort Wayne, Indiana 46803  
 Part 70 Permit No.: T003-6925-00013  
 Facility: Quartz Fabric oven 811 and the applicator cleaning area  
 Parameter: VOC emissions  
 Limit: Less than 40 tons per 12 consecutive months

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
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**

**DRAFT**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Phelps Dodge Magnet Wire Company  
Source Address: 4300 New Haven Avenue, Fort Wayne, In 46803  
Mailing Address: 2131 South Coliseum Boulevard, Fort Wayne, In 46803  
Part 70 Permit No.: T003-6925-00013

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. 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. 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:**

**DRAFT**

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit

#### Source Background and Description

<b>Source Name:</b>	<b>Phelps Dodge Magnet Wire Company</b>
<b>Source Location:</b>	<b>4300 New Haven Avenue, Fort Wayne, Indiana 46803</b>
<b>County:</b>	<b>Allen</b>
<b>SIC Code:</b>	<b>3357</b>
<b>Operation Permit No.:</b>	<b>T003-6925-00013</b>
<b>Operation Permit Issuance Date:</b>	<b>October 10, 2002</b>
<b>Modification Permit No.:</b>	<b>003-16769-00013</b>
<b>Permit Reviewer:</b>	<b>Mark A. Derf</b>

The Office of Air Quality (OAQ) has reviewed a petition for review for Phelps Dodge Magnet Wire Company relating to a magnet wire coating facility.

#### History

Phelps Dodge Magnet Wire Company (Phelps Dodge) was issued a Part 70 operating permit (T003-6925-00013) on October 10, 2002. Phelps Dodge petitioned for review of the Part 70 operating permit on November 8, 2002. This petition was filed in the Office of Environmental Adjudication under Cause Number 02-A-J-2973. This permit modification shows the changes made to the Part 70 operating permit in order to settle issues raised by the petition for review. A significant permit modification has been drafted due to the fact that changes in the permit include removal and revisions to compliance monitoring requirements, and changes in recordkeeping and testing requirements.

The appeal requests follow with the deleted language in the permit appearing as ~~strikeouts~~, and the new or revised language appearing underlined in the responses. In addition to any changes made to address appealed provisions, the permit has updated the Table of Contents and page numbering as needed. In order to address each appealed condition, all appeal items, which relate to a certain condition, are listed and any revisions to the condition will be incorporated together.

It should be noted that the source has recently requested that emission units listed in Section D.7 be permitted as insignificant sources, pursuant to 326 IAC 2-7-1(21)(E). IDEM OAQ has granted this request. Therefore, any Section D.7 condition that was appealed will not be addressed by this resolution, emission units listed under Section D.7 will be listed as insignificant and all sections following Section D.7 will be renumbered accordingly.

Also, Phelps submitted a request, received on January 21, 2004, to remove emissions units listed in Sections D.8 (MAG VZ 6 wire enameling oven #1 and #2) and D.9 (MAG VZ/5 wire enameling oven) from the Part 70 operating permit. Phelps has disconnected the three-(3) enameling machines and removed them from the facility. Therefore, all references to emission units in Section D.8 and D.9 will be stricken from the permit.

**Appeal Item 1:** [Part 70 operating permit appeal, Cause No. 02-A-J-2973]

The Petitioner objects to conditions D.1.5(c), D.2.5(c), D.3.5(b), D.4.4(c), D.5.5(c), D.6.5(c), D.7.5(d), D.8.5(d) and D.9.4(d) (Testing Requirements). The Petitioner states that due to the quantity of coatings and changes that occur to the formulation used at various times during operation, it is not feasible to stack test every time the VOC content increases. The destruction efficiency will not decrease just because VOC content increases.

**Appeal Item 2:** [Part 70 operating permit appeal, Cause No. 02-A-J-2973]

The Petitioner objects to Conditions D.7.5(c), D.8.5(c) and D.9.4(c) (Testing Requirements). The Petitioner states the condition would require the catalyst to be changed on equipment that is not operating. The Petitioner believes that the condition should indicate operation or use of the equipment because there is frequent downtime on certain pieces of equipment.

**Responses to Appeal Items 1 and 2:**

IDEM OAQ has reviewed Appeal Item #1, the requested changes to the testing requirement language mentioned in conditions D.1.5(c), D.2.5(c), D.3.5(b), D.4.4(c), D.5.5(c), D.6.5(c), D.7.5(d), D.8.5(d) and D.9.4(d). OAQ Compliance Data has indicated that previous stack testing conducted at the plant used a maximum pounds of VOC per hour to determine the maximum VOC emission loading. As the Permittee has indicated, the VOC content may not be the best indication of the maximum VOC loading into the system due to the amount of coating used and the diameter of the wire and line speed of the system. Therefore, conditions D.1.5(c), D.2.5(c), D.3.5(b), D.4.4(c), D.5.5(c), D.6.5(c), D.7.5(d), D.8.5(d) and D.9.4(d) will be revised.

IDEM OAQ has reviewed Appeal Item #2, the requested changes to the testing requirement language in conditions D.7.5(c), D.8.5(c) and D.9.4(c). IDEM OAQ is concerned about the effectiveness of the catalyst and whether if the catalyst is inactive for an extended period of time, it could become fouled and be unable to demonstrate compliance with emission limitations. In discussions with the source and obtaining manufacturer's information concerning the catalyst, the catalyst will not become deactivated due to inactivity. The manufacturer recommends the catalyst be brought up to temperature for a minimum of two (2) hours on fresh air to drive off moisture and dust and dirt that could have settled in the catalyst. IDEM OAQ will require that each catalyst, that has been inactive for a period of twenty four hours or more be heated up for a minimum of two (2) hours before operation of the oven/thermal oxidizer is resumed. The revisions have been made to previously numbered conditions D.7.5(c), D.8.5(c), and D.9.5(c) as listed below:

Phelps has requested to remove all emission units associated with Sections D.8 and D.9. IDEM OAQ has reviewed this request and has removed the emission units from the Part 70 permit. All references to Section D.8 and D.9 emission units are stricken from the permit and technical support documents.

**D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

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- (a) In order to demonstrate compliance with Condition D.1.1, within fifty (50) months after issuance of this permit, the Permittee shall conduct performance tests to verify VOC control efficiency as per Condition D.1.3 for the thermal oxidizers using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6.
- (b) One representative thermal oxidizer from the two oxidizers controlling the ten (10) Quartz Fabric enamel ovens shall be tested. The thermal oxidizer tested shall be the oxidizer in which the longest amount of time has elapsed since its previous test. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.

- (c) ~~Before using a coating with a higher VOC content than what was used during the stack test required in (a) above, the Permittee shall conduct a performance test to verify VOC control efficiency as per Condition D.1.3 for thermal oxidizers using methods approved by the Commissioner.~~ Additionally, if the temperature falls below the 1,150°F required minimum temperature it will be considered a violation unless the Permittee performs VOC testing utilizing methods as approved by the Commissioner to ensure compliance with the 90% overall control efficiency.

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.2.1, within fifty (50) months after issuance of this permit, the Permittee shall conduct performance tests to verify VOC control efficiency as per Condition D.2.3 for thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6.
- (b) One representative oven from the four (4) Lepel Quartz Fabric enamel ovens shall be tested. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (c) ~~Before using a coating with a higher VOC content than what was used during the stack test required in (a) above, the Permittee shall conduct a performance test to verify VOC control efficiency as per Condition D.2.3 for thermal oxidizers using methods approved by the Commissioner.~~ Additionally, if the temperature falls below the 1,150°F required minimum temperature it will be considered a violation unless the Permittee performs VOC testing utilizing methods as approved by the Commissioner to ensure compliance with the 90% overall control efficiency.

D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Conditions D.3.1 and D.3.2, within fifty (50) months after issuance of this permit, the Permittee shall conduct performance tests to verify VOC control efficiency as per Conditions D.3.1 for thermal oxidizers using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6.
- (b) ~~Before using a coating with a higher VOC content than what was used during the stack test required in (a) above, the Permittee shall conduct a performance test to verify VOC control efficiency as per Condition D.3.1 for thermal oxidizers using methods approved by the Commissioner.~~ Additionally, if the temperature falls below the 1,150°F required minimum temperature it will be considered a violation unless the Permittee performs VOC testing utilizing methods as approved by the Commissioner to ensure compliance with the 91.1% overall control efficiency.

D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.4.1, within fifty (50) months after issuance of this permit, the Permittee shall conduct performance tests to verify VOC control efficiency as per Condition D.4.1 for thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6.
- (b) One representative oven from the four (4) SICME ES enamel ovens shall be tested. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (c) ~~Before using a coating with a higher VOC content than what was used during the stack test required in (a) above, the Permittee shall conduct a performance test to verify VOC control efficiency as per Condition D.4.1 for thermal oxidizers using methods approved by the Commissioner.~~ Additionally, if the temperature falls below the 1,400°F required minimum temperature it will be considered a violation unless the Permittee performs VOC

testing utilizing methods as approved by the Commissioner to ensure compliance with the 96.7% overall control efficiency.

D.5.5 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.5.1, within ~~sixty (60) days~~ fifty (50) months after issuance of this permit, the Permittee shall conduct performance tests to verify VOC control efficiency as per Condition D.5.3 for thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6.
- (b) One representative oven from the six (6) Square/Rectangular enamel ovens shall be tested. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (c) ~~Before using a coating with a higher VOC content than what was used during the stack test required in (a) above, the Permittee shall conduct a performance test to verify VOC control efficiency as per Condition D.5.3 for thermal oxidizers using methods approved by the Commissioner.~~ Additionally, if the temperature falls below the 1,100°F required minimum temperature it will be considered a violation unless the Permittee performs VOC testing utilizing methods as approved by the Commissioner to ensure compliance with the 85% overall control efficiency.

D.6.5 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.6.1, within ~~sixty (60) days~~ fifty (50) months after issuance of this permit, the Permittee shall conduct performance tests to verify VOC control efficiency as per Condition D.6.3 for thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6.
- (b) One representative oven from the twelve (12) MOCO enamel ovens shall be tested. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (c) ~~Before using a coating with a higher VOC content than what was used during the stack test required in (a) above, the Permittee shall conduct a performance test to verify VOC control efficiency as per Condition D.6.3 for thermal oxidizers using methods approved by the Commissioner.~~ Additionally, if the temperature falls below the 1,100°F required minimum temperature it will be considered a violation unless the Permittee performs VOC testing utilizing methods as approved by the Commissioner to ensure compliance with the 85% overall control efficiency.

**Appeal Item 3:** [Part 70 operating permit appeal, Cause No. 02-A-J-2973]

The Petitioner objects to conditions D.1.6(b), D.2.6(b), D.3.7(b), D.4.5(b), D.5.6(b) and D.6.6(b) (Thermal Oxidizer). The Petitioner states that the proposed MACT standard for miscellaneous metal parts coating that includes magnet wire has requirements that will monitor capture systems. The Petitioner believes that the duct pressure or fan amperage monitoring is not necessary and should be removed from the permit.

**Appeal Item 4:** [Part 70 operating permit appeal, Cause No. 02-A-J-2973]

The Petitioner objects to conditions D.2.6(a), D.3.7(a), D.4.5(a), D.5.6(a), D.6.6(a) and D.8.7(a) (Thermal Oxidizer). The Petitioner states that the condition does not provide a change in temperature based on testing.

### Responses to Appeal Items 3 and 4:

IDEM OAQ has reviewed Appeal Item #3, the requested changes to the Thermal Oxidizer language in conditions D.1.6(b), D.2.6(b), D.3.7(b), D.4.5(b), D.5.6(b) and D.6.6(b). IDEM OAQ agrees that the fan amperage or duct pressure monitoring requirements are not necessary to demonstrate compliance with all VOC emission limitations. Therefore all references to the fan amperage or duct pressure monitoring requirements within the permit will be removed.

IDEM believes that the thermal oxidizer operation language as mentioned in Conditions D.1.4, D.2.4, D.5.4 and D.6.4 are duplicative to corresponding language in Conditions D.1.6, D.2.6, D.5.6 and D.6.6. Therefore, Conditions D.1.4, D.2.4, D.5.4 and D.6.4 will be revised to incorporate any additional requirements from Conditions D.1.6, D.2.6, D.5.6 and D.6.6 not contained in Conditions D.1.4, D.2.4, D.5.4 and D.6.4.

IDEM OAQ has reviewed Appeal Item #4, the requested changes to the Thermal Oxidizer language in conditions D.2.6(a), D.3.7(a), D.4.5(a), D.5.5(a), D.6.6(a) and D.8.7(a). Subsection (a) indicates that from the issuance of the permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizers at a given temperature. IDEM OAQ would point out that subsection (b) and (c) of these conditions provide the source with an opportunity to determine temperatures observed during a compliant stack test that demonstrate compliance with emission limitations. Therefore, no changes will be made to conditions D.2.6(a), D.3.7(a), D.4.5(a), D.5.5(a), D.6.6(a) and D.8.7(a) as well as conditions D.7.6(a) and D.9.5(a) as a result of this petition.

#### D.1.4 Thermal Oxidizer Operation

- (a) Pursuant to the Construction Permit issued on October 17, 1997 (CP 003-8609-00013), the thermal oxidizers shall operate at all times that the ten (10) Quartz Fabric ovens are in operation. When operating, the thermal oxidizers shall maintain a minimum operating temperature of 1,150 degrees Fahrenheit or a temperature determined in the latest compliance testing to maintain a destruction efficiency of not less than ninety percent (90%) of volatile organic compound (VOC) in order to demonstrate compliance with Condition D.1.1 and D.1.3
- (b) The Permittee shall determine the temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.1, as approved by IDEM.
- (~~b~~c) In order to satisfy the requirements of 326 IAC 8-6 and Condition D.1.1, the external thermal oxidizers must operate with a minimum destruction efficiency of ninety percent (90%) and a minimum capture efficiency such that the overall control efficiency is at least eighty-five percent (85%).

#### D.1.6 Thermal Oxidizer

- ~~(a) From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizers at or above the hourly average temperature of 621 degrees Celsius.~~
- ~~(b) The Permittee shall determine the temperature and fan amperage, or duct pressure, from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.1, as approved by IDEM.~~
- ~~(c) From the date of the approved stack test results are available, the Permittee shall operate the thermal oxidizers at or above the hourly average temperature and fan amperage, or duct pressure as observed during the compliant stack test.~~

#### D.2.4 Thermal Oxidizer Operation

- (a) Pursuant to the Construction Permit issued on October 17, 1997 (CP 003-8609-00013), the external thermal oxidizers shall operate at all times that the four (4) Lepel Fabric ovens are in operation. When operating, the external thermal oxidizers shall maintain a

minimum operating temperature of 1,150 degrees Fahrenheit or a temperature determined in the latest compliance testing to maintain a destruction efficiency of not less than ninety percent (90%) of volatile organic compound (VOC) captured, in order to demonstrate compliance with Condition D.2.1 and D.2.3.

- (b) The Permittee shall determine the temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.2.1, as approved by IDEM.
- (c) In order to ensure compliance with Condition D.2.1 and (a) above, the external thermal oxidizers must operate with a minimum destruction efficiency of ninety percent (90%) and a minimum capture efficiency such that the overall control efficiency is at least eighty-five percent (85%).

#### D.2.6 Thermal Oxidizer

- ~~(a) From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizers at or above the hourly average temperature of 621 degrees Celsius.~~
- ~~(b) The Permittee shall determine the temperature and fan amperage, or duct pressure, from the most recent valid stack test that demonstrates compliance with limits in Condition D.2.3, as approved by IDEM.~~
- ~~(c) From the date of the approved stack test results are available, the Permittee shall operate the thermal oxidizers at or above the hourly average temperature and fan amperage, or duct pressure, as observed during the compliant stack test.~~

#### D.3.7 Thermal Oxidizer

- (a) From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature of 1,150 degrees Fahrenheit.
- (b) The Permittee shall determine the temperature ~~and fan amperage, or duct pressure,~~ from the most recent valid stack test that demonstrates compliance with limits in Conditions D.3.1 and D.3.2, as approved by IDEM.
- (c) From the date of the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature ~~and fan amperage, or duct pressure,~~ as observed during the compliant stack test.

#### D.4.5 Thermal Oxidizer

- (a) From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizers at or above the hourly average temperature of 1,400 degrees Fahrenheit.
- (b) The Permittee shall determine the temperature ~~and fan amperage, or duct pressure,~~ from the most recent valid stack test that demonstrates compliance with limits in Condition D.4.1, as approved by IDEM.
- (c) From the date of the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature ~~and fan amperage, or duct pressure,~~ as observed during the compliant stack test.

#### D.5.4 Thermal Oxidizer Operation

To ensure compliance with Condition D.5.1, the external thermal oxidizers shall operate at all times that the six (6) square/rectangular ovens are in operation. When operating, the external thermal oxidizers shall maintain a minimum operating temperature of 1,150 degrees Fahrenheit or a temperature determined in the latest compliance testing to maintain a volatile organic compound

(VOC) overall control efficiency of not less than eighty-five percent (85%), in order to demonstrate compliance with Condition D.5.1 and D.5.3.

#### D.5.6 Thermal Oxidizer

- ~~(a) From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature of 593 degrees Celsius.~~
- ~~(b) The Permittee shall determine the temperature and fan amperage, or duct pressure, from the most recent valid stack test that demonstrates compliance with limits in Condition D.5.1 as approved by IDEM.~~
- ~~(c) From the date of the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature and fan amperage, or duct pressure, as observed during the compliant stack test.~~

#### **D.6.4 Thermal Oxidizer**

- (a) In order to satisfy the requirements of 326 IAC 8-6 and Condition D.6.1, the external thermal oxidizers must operate such that the overall control efficiency is at least eighty-five percent (85%).
- (b) To ensure compliance with Condition D.6.1, the external thermal oxidizers shall operate at all times that the twelve (12) MOCO enamel ovens are in operation. When operating, the external thermal oxidizers shall maintain a minimum operating temperature of 1,150 degrees Fahrenheit or a temperature determined in the latest compliance testing to maintain a volatile organic compound (VOC) overall control efficiency of not less than eighty-five percent (85%).

#### D.6.6 Thermal Oxidizer

- ~~(a) From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizers at or above the hourly average temperature of 593 degrees Celsius.~~
- ~~(b) The Permittee shall determine the temperature and fan amperage, or duct pressure, from the most recent valid stack test that demonstrates compliance with limits in Condition D.6.1, as approved by IDEM.~~
- ~~(c) From the date of the approved stack test results are available, the Permittee shall operate the thermal oxidizers at or above the hourly average temperature and fan amperage, or duct pressure, as observed during the compliant stack test.~~

#### **Appeal Item 5:** [Part 70 operating permit appeal, Cause No. 02-A-J-2973]

The Petitioner objects to conditions D.1.7(a), D.2.7(a), D.3.8(a), D.4.6(a), D.5.7(a), D.6.7(a), D.8.8 and D.9.6 (Parametric Monitoring). The Petitioner states that the conditions require that if the continuous monitoring system is not in operation, the temperature will be recorded manually once every 15-minute period. The Petitioner believes that the facility does not have the personnel to support this activity, as there are over 37 temperature monitoring locations at the facility.

#### **Appeal Item 6:** [Part 70 operating permit appeal, Cause No. 02-A-J-2973]

The Petitioner objects to conditions D.1.7(b), D.2.7(b), D.3.8(b), D.4.6(b), D.5.7(b) and D.6.7(b) (Parametric Monitoring). The Petitioner states that the proposed MACT standard for miscellaneous metal parts coating that includes magnet wire has requirements that will monitor capture systems. The Petitioner believes that the duct pressure or fan amperage monitoring is not necessary and should be removed from the permit.

#### **Responses to Appeal Items 5 and 6:**

IDEM OAQ has reviewed Appeal Item 5, the requested changes to the parametric monitoring language in conditions D.1.7(a), D.2.7(a), D.3.8(a), D.4.6(a), D.5.7(a), D.6.7(a), D.7.7, D.8.8 and D.9.6. IDEM OAQ and the Permittee have had discussions concerning the configuration of the primary and secondary monitoring systems on each oven. It is IDEM OAQ's understanding that the monitoring systems consist of a central computer system which collects the temperature data from each oven in the plant. If the central computer system fails, there is no secondary monitoring system independent of the central computer system that has the capability of collecting and storing the temperature data on the oxidizers. In this case, there would be no documentation available to demonstrate compliance with the monitoring requirements and therefore, manual records of the temperature of the oxidizers would need to be made. IDEM OAQ believes that records of the oxidizer temperature should be made once an hour when the monitoring system is down. The manual recording of the temperatures are made in conjunction with the alarm system mentioned below.

It is IDEM's understanding that each oven has a temperature alarm system. An audible alarm activates when the temperature within the oven falls below the set point established by the source. If the temperature is brought up above the set point in less than 15 minutes, no additional action is taken. If the alarm sounds for more than 15 minutes, the operator of the oven makes a record of the occurrence of an alarm and takes the corrective actions as prescribed in the Compliance Response Plan. The corrective action should bring the temperature back to the ranges specified by the source to demonstrate compliance with applicable permit requirements.

Based on the discussions, IDEM has revised the parametric monitoring requirement listed in conditions D.1.7(a), D.2.7(a), D.3.8(a), D.4.6(a), D.5.7(a), D.6.7(a), D.8.8 and D.9.6.

IDEM OAQ has reviewed Appeal Item 6, the requested changes to the Parametric Monitoring language in conditions D.1.7(b), D.2.7(b), D.3.8(b), D.4.6(b), D.5.7(b) and D.6.7(b). IDEM OAQ agrees that the fan amperage or duct pressure monitoring requirements are not necessary to demonstrate compliance with all VOC emission limitations. Therefore all references to the fan amperage or duct pressure monitoring requirements within the permit will be removed as listed below.

Phelps has requested to remove all emission units associated with Sections D.8 and D.9. IDEM OAQ has reviewed this request and has removed the emission units from the Part 70 permit. All references to Section D.8 and D.9 emission units are stricken from the permit and technical support documents.

#### D.1.76 Parametric Monitoring

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- ~~(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be at or above the hourly average temperature used to demonstrate compliance during the most recent compliance stack test. If the continuous monitoring system is not in operation, the temperature will be recorded manually once every 15-minute period.~~
- ~~(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizers are in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as indicated by the manufacturer or as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C Compliance Response Plan Preparation, Implementation, Records, and Reports. A reading that is outside the above mentioned range. Failure to take response steps in accordance with Section C Compliance Response Plan Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.~~
- (a) Compliance with the 1,150°F minimum temperature or temperature determined in the latest compliance testing to maintain a destruction efficiency of not less than ninety percent (90%) of volatile organic compound (VOC) will be monitored by computer

collected data generated continuously. The continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature.

- (b) Eight-hour average temperatures will be made available to IDEM upon request and one-hour average temperature records will be made available within five business days from request.
- (d) The temperatures will be reported based on an eight-hour average.
- (e) The oxidizer shall operate with a five (5) degree buffer such that if the eight hour average temperature falls within five (5) degrees of the minimum required temperature, corrective action shall be performed and one-hour average temperatures shall be investigated to determine if any temperature fell below the actual minimum temperature. If a one-hour average temperature is less than the established minimum temperature, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

#### D.2.76 Parametric Monitoring

- ~~(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be at or above the hourly average temperature used to demonstrate compliance during the most recent compliance stack test. If the continuous monitoring system is not in operation, the temperature will be recorded manually once every 15-minute period.~~
- ~~(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizers are in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as indicated by the manufacturer or as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the above mentioned range. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.~~
- (a) Compliance with the 1,150°F minimum temperature or temperature determined in the latest compliance testing to maintain a destruction efficiency of not less than ninety percent (90%) of volatile organic compound (VOC) will be monitored by computer collected data generated continuously. The continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature.
- (b) Eight-hour average temperatures will be made available to IDEM upon request and one-hour average temperature records will be made available within five business days from request.
- (c) The temperatures will be reported based on an eight-hour average.
- (d) The oxidizer shall operate with a five (5) degree buffer such that if the eight hour average temperature falls within five (5) degrees of the minimum required temperature, corrective action shall be performed and one-hour average temperatures shall be investigated to determine if any temperature fell below the actual minimum temperature. If a one-hour average temperature is less than the established minimum temperature, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take

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

#### D.3.8 Parametric Monitoring

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- ~~(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be at or above the hourly average temperature used to demonstrate compliance during the most recent compliance stack test. If the continuous monitoring system is not in operation, the temperature will be recorded manually once every 15-minute period.~~
- ~~(b) duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizers are in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range permitted temperature of the oxidizer as indicated by the manufacturer or as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan- Preparation, Implementation, Records, and Reports. Activation of the alarm represents A a temperature reading that is outside the above mentioned range permitted temperature of the oxidizer. Failure to take response steps in accordance with Section C -Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.~~
- (a) Compliance with the 1,150°F minimum temperature or temperature determined in the latest compliance testing will be monitored by computer collected data generated continuously. The continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature.
- (b) Eight-hour average temperatures will be made available to IDEM upon request and one-hour average temperature records will be made available within five business days from request.
- (c) The temperatures will be reported based on an eight-hour average.
- (d) The oxidizer shall operate with a five (5) degree buffer such that if the eight hour average temperature falls within five (5) degrees of the minimum required temperature, corrective action shall be performed and one-hour average temperatures shall be investigated to determine if any temperature fell below the actual minimum temperature. If a one-hour average temperature is less than the established minimum temperature, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

#### D.4.6 Parametric Monitoring

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- ~~(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be at or above the hourly average temperature used to demonstrate compliance during the most recent compliance stack test. If the continuous monitoring system is not in operation, the temperature will be recorded manually once every 15-minute period.~~
- ~~(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizers are in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as indicated by the manufacturer or as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan- Preparation, Implementation, Records, and Reports. A 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 deviation of this permit.~~

- ~~(a) Compliance with the 1,400°F minimum temperature or temperature determined in the latest compliance testing will be monitored by computer collected data generated continuously. The continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature.~~
- ~~(b) Eight-hour average temperatures will be made available to IDEM upon request and one-hour average temperature records will be made available within five business days from request.~~
- ~~(c) The temperatures will be reported based on an eight-hour average.~~
- ~~(d) The oxidizer shall operate with a five (5) degree buffer such that if the eight hour average temperature falls within five (5) degrees of the minimum required temperature, corrective action shall be performed and one-hour average temperatures shall be investigated to determine if any temperature fell below the actual minimum temperature. If a one-hour average temperature is less than the established minimum temperature, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.~~

#### D.5.7 Parametric Monitoring

- ~~(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be at or above the hourly average temperature used to demonstrate compliance during the most recent compliance stack test. If the continuous monitoring system is not in operation, the temperature will be recorded manually once every 15-minute period.~~
- ~~(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizers are in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as indicated by the manufacturer or as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports. A 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 deviation of this permit.~~
- ~~(a) Compliance with the 1,100°F minimum temperature or a temperature determined in the latest compliance testing to maintain a volatile organic compound (VOC) overall control efficiency of not less than eighty-five percent (85%), will be monitored by computer collected data generated continuously. The continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature.~~
- ~~(b) Eight-hour average temperatures will be made available to IDEM upon request and one-hour average temperature records will be made available within five business days from request.~~
- ~~(c) The temperature will be reported based on an eight-hour average.~~
- ~~(d) The oxidizer shall operate with a five (5) degree buffer such that if the eight hour average temperature falls within five (5) degree of the minimum required temperature, corrective~~

action shall be performed and one-hour average temperatures shall be investigated to determine if any temperature fell below the actual minimum temperature. If a one-hour average temperature is less than the established minimum temperature, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

#### D.6.76 Parametric Monitoring

- ~~(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be at or above the hourly average temperature used to demonstrate compliance during the most recent compliance stack test. If the continuous monitoring system is not in operation, the temperature will be recorded manually once every 15-minute period.~~
- ~~(b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizers are in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as indicated by the manufacturer or as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A 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 deviation of this permit.~~
- (a) Compliance with the 1,100°F minimum temperature or a temperature determined in the latest compliance testing to maintain a volatile organic compound (VOC) overall control efficiency of not less than eighty-five percent (85%) will be monitored by computer collected data generated continuously. The continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature.
- (b) Eight-hour average temperatures will be made available to IDEM upon request and one-hour average temperature records will be made available within five business days from request.
- (c) The temperature will be reported based on an eight-hour average.
- (d) The oxidizer shall operate with a five (5) degree buffer such that if the eight hour average temperature falls within five (5) degree of the minimum required temperature, corrective action shall be performed and one-hour average temperatures shall be investigated to determine if any temperature fell below the actual minimum temperature. If a one-hour average temperature is less than the established minimum temperature, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

#### **Appeal Item 7:** [Part 70 operating permit appeal, Cause No. 02-A-J-2973]

The Petitioner objects to conditions D.1.8(a)(1), D.2.8(a)(1), D.3.9(a)(5), D.4.7(a)(5), D.5.8(a)(1), D.6.8(a)(1), D.7.9(a)(5), D.8.10(a)(5) and D.9.8(a)(5) (Record Keeping Requirements). The Petitioner states the condition as written only takes into account destruction efficiency and does not account for capture efficiency. The Petitioner believes that the equation contained within the condition should be corrected by changing destruction efficiency to overall control.

#### **Appeal Item 8:** [Part 70 operating permit appeal, Cause No. 02-A-J-2973]

The Petitioner objects to conditions D.1.8(a)(2), D.2.8(a)(2), D.3.9(b)(1), D.4.7(b)(1), D.5.8(a)(2), D.6.8(a)(2), D.7.9(b), D.8.10(b) and D.9.8(b) (Record Keeping Requirements). The Petitioner states the condition should take a 3-hour average on continuous temperature recorded instead of an hourly average.

**Appeal Item 9:** [Part 70 operating permit appeal, Cause No. 02-A-J-2973]

The Petitioner objects to conditions D.1.8(a)(3), D.2.8(a)(3), D.3.9(b)(2), D.4.7(b)(2), D.5.8(a)(3) and D.6.8(a)(3). (Record Keeping Requirements). The Petitioner states that the proposed MACT standard for miscellaneous metal parts coating that includes magnet wire has requirements that will monitor capture systems. The Petitioner believes that the duct pressure or fan amperage daily recording is not necessary and should be removed from the permit.

**Appeal Item 10:** [Part 70 operating permit appeal, Cause No. 02-A-J-2973]

The Petitioner objects to conditions D.3.9(a)(2)(A), D.4.7(a)(2)(A), D.7.9(a)(2)(a), D.8.10(a)(2)(A), D.9.8(a)(2)(A) and D.10.4(a)(2)(a) (Record Keeping Requirements). The Petitioner states the usage records are maintained through an electronic data system and question if this can be maintained as backup or overall verification.

**Appeal Item 11:** [Part 70 operating permit appeal, Cause No. 02-A-J-2973]

The Petitioner objects to conditions D.3.9(a)(2)(B), D.4.7(a)(2)(B), D.7.9(a)(2)(b), D.8.10(a)(2)(B), D.9.8(a)(2)(B) and D.10.4(a)(2)(b) (Record Keeping Requirements). The Petitioner states the clean up solvent is dispensed from a central location and would be difficult to determine the amount of clean up solvent dispensed for each machine.

**Appeal Item 12:** [Part 70 operating permit appeal, Cause No. 02-A-J-2973]

The Petitioner objects to conditions D.3.9(a)(3), D.4.7(a)(3), D.7.9(a)(3), D.8.10(a)(3), D.9.8(a)(3) and D.10.4(a)(3) (Record Keeping Requirements). The Petitioner states the clean up solvent is dispensed from a central location and would be difficult to determine the amount of clean up solvent dispensed for each machine.

**Responses to Appeal Items 7 through 12:**

IDEM OAQ has reviewed Appeal Item 7, the requested changes to the Record Keeping Requirements language in conditions D.1.8(a)(1), D.2.8(a)(1), D.3.9(a)(5), D.4.7(a)(5), D.5.8(a)(1), D.6.8(a)(1), D.7.9(a)(5), D.8.10(a)(5) and D.9.8(a)(5). IDEM OAQ agrees with the request and has made the revisions as shown below.

IDEM OAQ has reviewed Appeal Item 8, the requested changes to the Record Keeping Requirements language in conditions D.1.8(a)(2), D.2.8(a)(2), D.3.9(b)(1), D.4.7(b)(1), D.5.8(a)(2), D.6.8(a)(2), D.7.9(b), D.8.10(b) and D.9.8(b). IDEM OAQ agrees that the continuous temperature recorded should be based on an three (3) hour average. The 3-hour average for continuous temperature recorded will be consistent with time period needed to conduct compliant stack test, which are based on 3-hour testing runs. Therefore, the revisions have been made as shown below.

IDEM OAQ has reviewed Appeal Item 9, the requested changes to the Record Keeping Requirements language in conditions D.1.8(a)(3), D.2.8(a)(3), D.3.9(b)(2), D.4.7(b)(2), D.5.8(a)(3) and D.6.8(a)(3). IDEM OAQ agrees that the fan amperage or duct pressure record keeping requirements are not necessary to demonstrate compliance with all VOC emission limitations. Therefore all references to the fan amperage or duct pressure record keeping requirements within the permit will be removed.

IDEM OAQ has reviewed Appeal Item 10, the objection to the record keeping language in conditions D.3.9(a)(2)(A), D.4.7(a)(2)(A), D.7.9(a)(2)(a), D.8.10(a)(2)(A), D.9.8(a)(2)(A) and

D.10.4(a)(2)(a). IDEM OAQ Air Compliance has determined that the electronic data system will suffice as electronic equivalent record keeping provided that the data is accessible to IDEM inspectors. Therefore, no changes will be made to the conditions as a result of this petition.

IDEM OAQ has reviewed Appeal Item 11, the objection to the record keeping language in conditions D.3.9(a)(2)(B), D.4.7(a)(2)(B), D.7.9(a)(2)(b), D.8.10(a)(2)(B), D.9.8(a)(2)(B) and D.10.4(a)(2)(b). IDEM OAQ understands that due to the configuration of the clean-up solvent central location, tracking the solvent to individual emission units will be difficult. However, the emission units listed in sections D.3, D.8, and D.10 must comply with emission limits in order to demonstrate Prevention of Significant Deterioration (PSD) rules are not applicable. The record keeping requirements for emission units listed in sections D.3, D.8 and D.10 are necessary to determine compliance with emissions limitations to make PSD not applicable. Record keeping of the clean up solvents used for emission units listed in sections D.4, D.7 and D.9 will be based on the amount of clean-up solvent used.

IDEM OAQ has reviewed Appeal Item 12, the objection to the record keeping language in conditions D.3.9(a)(3), D.4.7(a)(3), D.7.9(a)(3), D.8.10(a)(3), D.9.8(a)(3) and D.10.4(a)(3). IDEM OAQ understands that due to the configuration of the clean-up solvent central location, tracking the solvent to individual emission units will be difficult. However, the emission units listed in sections D.3, D.7, and D.9 must comply with emission limits in order to demonstrate Prevention of Significant Deterioration (PSD) rules are not applicable. The record keeping requirements for emission units listed in sections D.3, D.7 and D.9 must be recorded to determine compliance with emissions limitations. Record keeping of the clean up solvents used for emission units listed in sections D.4, D.6, D.7 and D.9 will be based on the amount of clean-up solvent used.

Phelps has requested to remove all emission units associated with Sections D.8 and D.9. IDEM OAQ has reviewed this request and has removed the emission units from the Part 70 permit. All references to Section D.8 and D.9 emission units are stricken from the permit and technical support documents.

#### D.1.87 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.76, the Permittee shall maintain:
- (1) Records of the VOC emitted based on:  $\text{VOC delivered to the applicators} \times (1 - \% \text{ destruction overall efficiency}/100) + \text{VOC in cleaning solvent}$ .
  - (2) ~~Continuous temperature records (on an hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test.~~ Records of the computer collected data.
  - ~~(3) Daily records of the duct pressure or fan amperage.~~
- (b) All records shall be maintained in accordance with Section C- General Record Keeping Requirements of this permit.

#### D.2.87 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1 and D.2.76, the Permittee shall maintain:
- (1) Records of the VOC emitted based on:  $\text{VOC delivered to the applicators} \times (1 - \% \text{ destruction overall efficiency}/100) + \text{VOC in cleaning solvent}$ .
  - (2) ~~Continuous temperature records (on an hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test.~~ Records of the computer collected data.

~~(3) — Daily records of the duct pressure or fan amperage.~~

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

#### D.3.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits and/or the VOC emission limits established in Conditions D.3.1 and D.3.2.
- (1) The VOC content of each coating material and solvent used less water.
  - (2) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include purchase orders, and invoices as maintained in the Business Production Control System (BPCS), and in conjunction with material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The total monthly cleanup solvent usage for sources listed under D.3, D.7 and D.9 of this permit.
  - (4) The total VOC usage for each month.
  - (5) The VOC emitted based on: VOC delivered to the applicators x (1 - % destruction overall efficiency/100) + VOC in cleaning solvent.
- (b) To document compliance with Condition D.3.8, the Permittee shall maintain records of the computer collected data.
- ~~(1) — Continuous temperature records (on an hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test.~~
  - ~~(2) — Daily records of the duct pressure or fan amperage.~~
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.4.7 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits and/or the VOC emission limits established in Conditions D.4.1
- (1) The VOC content of each coating material and solvent used less water.
  - (2) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include purchase orders, and invoices as maintained in the Business Production Control System (BPCS), and in conjunction with material safety data sheets (MSDS) necessary to verify the type and amount used.

- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The monthly cleanup solvent usage.
- (4) The total VOC usage for each month.
- (5) The VOC emitted (in tons per year) based on: VOC delivered x (1 - % ~~destruction~~ overall efficiency/100) + VOC in cleaning solvent.
- (b) To document compliance with Condition D.4.6, the Permittee shall maintain records of the computer collected data.
  - ~~(1) — Continuous temperature records (on an hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test.~~
  - ~~(2) — Daily records of the duct pressure or fan amperage.~~
- (c) All records shall be maintained in accordance with Section C- General Record Keeping Requirements, of this permit.

#### D.5.87 Record Keeping Requirements

- (a) To document compliance with Conditions D.5.1 and D.5.76, the Permittee shall maintain:
  - (1) Records of the VOC emitted based on: VOC delivered to the applicators x (1 - % ~~destruction~~ overall efficiency/100) + VOC in cleaning solvent.
  - (2) ~~Continuous temperature records (on an hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test.~~ Records of the computer collected data.
  - ~~(3) — Daily records of the duct pressure or fan amperage.~~
- (b) All records shall be maintained in accordance with Section C- General Record Keeping Requirements of this permit.

#### D.6.87 Record Keeping Requirements

- (a) To document compliance with Conditions D.6.1 and D.6.76, the Permittee shall maintain:
  - (1) Records of the VOC emitted based on: VOC delivered to the applicators x (1 - % ~~destruction~~ overall efficiency/100) + VOC in cleaning solvent.
  - (2) ~~Continuous temperature records (on an hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test.~~ Records of the computer collected data.
  - ~~(3) — Daily records of the duct pressure or fan amperage.~~
- (b) All records shall be maintained in accordance with Section C- General Record Keeping Requirements of this permit.

#### **Appeal Item 13:** [Part 70 operating permit appeal, Cause No. 02-A-J-2973]

The Petitioner objects to conditions D.3.2 and D.8.2 (PSD Limit). The Petitioner states the

condition is confusing and should be revised to mention the 40 tons is a limit only. Applicability of PSD would be determined upon modification of the source.

**Response 13:**

IDEM OAQ has reviewed the requested changes to the PSD limit language in conditions D.3.2 and D.8.2. IDEM OAQ agrees that the condition should be revised in order to more clearly define the PSD applicability if the source were to apply for a modification, which would increase its potential to emit.

Phelps has requested to remove all emission units associated with Sections D.8 and D.9. IDEM OAQ has reviewed this request and has removed the emission units from the Part 70 permit. All references to Section D.8 and D.9 emission units are stricken from the permit and technical support documents. Conditions D.3.2 and D.8.2 as well as D.10.1 have been revised as follows:

D.3.2 PSD Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 003-8609-00013 issued on October 17, 1997, the VOC emissions from the Quartz Fabric oven (emission unit 811)(Section D.3), ~~the two (2) MAG VZ6 ovens (Section D.87),~~ and the applicator cleaning area (Section D.107) shall be limited to less than 40 tons VOC per twelve (12) consecutive month period. ~~An increase in total VOC emissions from these equipment above 40 tons per year shall require a PSD permit pursuant to 326 IAC 2-2 and 40 CFR 52.21 before such change may occur. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.~~

~~D.87.2 PSD Limit [326 IAC 2-2] [40 CFR 52.21]~~

~~Pursuant to CP 003-8609-00013 issued on October 17, 1997, the VOC emissions from the Quartz Fabric oven (emission unit 811)(Section D.3), the two (2) MAG VZ6 ovens (Section D.87), and the applicator cleaning area (Section D.109) shall be limited to less than 40 tons per twelve (12) consecutive months of VOC. An increase in total VOC emissions from these equipment above 40 tons per year shall require a PSD permit pursuant to 326 IAC 2-2 and 40 CFR 52.21 before such change may occur. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.~~

~~D.107.1 PSD Limit [326 IAC 2-2] [40 CFR 52.21]~~

~~Pursuant to CP 003-8609-00013 issued on October 17, 1997, the VOC emissions from the Quartz Fabric oven (emission unit 811)(Section D.3), ~~the two (2) MAG VZ6 ovens (Section D.87),~~ and the applicator cleaning area (Section D.107) shall be limited to less than 40 tons per twelve (12) consecutive months of VOC. An increase in total VOC emissions from these equipment above 40 tons per year shall require a PSD permit pursuant to 326 IAC 2-2 and 40 CFR 52.21 before such change may occur. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.~~

**Appeal Item 14:** [Part 70 operating permit appeal, Cause No. 02-A-J-2973]

The Petitioner objects to Condition D.5.4 (Thermal Oxidizer Operation). The Petitioner states the condition may conflict with the emergency provision in condition B.12.

**Appeal Item 15:** [Part 70 operating permit appeal, Cause No. 02-A-J-2973]

The Petitioner objects to Conditions D.7.8, D.8.9 and D.9.7 (Catalyst Replacement). The Petitioner states the conditions would require the catalyst to be changed on equipment that is not operating. The Petitioner believes that the condition should indicate operation or use of the equipment because there is frequent downtime on certain pieces of equipment.

**Response to Appeal Items 14 and 15:**

IDEM OAQ has reviewed Appeal Item 14, the requested changes to the Thermal Oxidizer Operation language in condition D.5.4. Condition B.12 allows for emergency reporting and in the

event of an emergency, the proper reporting procedures (i.e., filling out the emergency occurrence report) should be followed. No changes will be made to condition D.5.4 as a result of the petition for review.

Phelps has requested to remove all emission units associated with Sections D.8 and D.9. IDEM OAQ has reviewed this request and has removed the emission units from the Part 70 permit. All references to Section D.8 and D.9 emission units are stricken from the permit and technical support documents.

**Appeal Item 16:** [Part 70 operating permit appeal, Cause No. 02-A-J-2973]

The Petitioner objects to condition D.9.5(c) (Catalytic Oxidizer). The Petitioner states condition is unclear if this catalytic oxidizer temperature is measured at the inlet or the outlet of the oxidizer.

**Response 16:**

IDEM OAQ has reviewed the request for clarification of the catalytic oxidizer requirements in condition D.9.5(c). In order to measure the temperature of the catalytic oxidizer to demonstrate compliance with the VOC emission limitations and overall efficiency limits, the destruction of VOCs will occur within the oxidizer and the outlet temperature of the exhaust would provide the best indication of the destruction temperature. Therefore, no changes to condition D.9.5(c) will be made as a result of this petition for review.

**Additional Changes to Permit:**

Phelps submitted a request on December 12, 2002 that all emission sources listed in Section D.7 be permitted as insignificant sources. Phelps states that they will operate the ovens as research and development ovens for evaluation and testing of new products. Pursuant to 326 IAC 2-7-1(21)(E), MAG VEL 6, MAG VEL 8 and MAG HZ 4 wire enameling pilot ovens are insignificant. Due to the applicability of 326 IAC 8-2-8, all emission limits, compliance monitoring and determinations, record keeping and reports requirements will remain to demonstrate compliance.

Phelps has requested on January 21, 2004 to remove all emission units associated with Sections D.8 and D.9. IDEM OAQ has reviewed this request and has removed the emission units from the Part 70 permit. All references to Section D.8 and D.9 emission units are stricken from the permit and technical support documents.

Testing requirements for emission units in D.5 and D.6 will be revised in order to account for testing of the square/rectangular and MOCO wire enameling ovens conducted in June of 2001. This testing was accepted by IDEM OAQ for future compliance demonstration for the emission units. Therefore, the testing requirements in conditions D.5.5 and D.6.5 have been revised to change the testing period to within 50 months after issuance of the permit. The revisions are listed in the Response to Appeal Item #1 and #2.

Phelps has also requested conditions D.3.1, D.4.1, D.7.1, D.8.1 and D.12.1 be revised to limit Phelps to 1.7 pounds of VOC per gallon (lb. VOC/gallon) and not the calculated overall control efficiency listed in condition D.3.1(d), D.4.1(d), D.7.1(d), D.8.1(d) and D.12.1(d). IDEM has reviewed this request. In order to demonstrate compliance with 326 IAC 8-2-8 and 326 IAC 8-1-2(c), Phelps must demonstrate compliance with the 1.7 lbs VOC/gallon and the listed overall control efficiency for the thermal oxidizers listed in section D.3, D.4 and D.7. IDEM has made the following changes to better demonstrate compliance with 326 IAC 8-2-8 and 326 IAC 8-1-2(c) requirements.

**D.3.1 Volatile Organic Compounds [326 IAC 8-2-8]**

- (a) Pursuant to 326 IAC 8-2-8 (Magnet Wire Coating Operations) and CP 003-8609-00013 issued on October 17, 1997, the owner or operator shall not allow the discharge into the atmosphere of VOC in excess of 1.7 pounds VOC per gallon of coating, excluding water, as delivered to the applicator.

- (b) The equivalent pounds of VOC per gallon of coating solids (as applied) shall be limited to less than 2.21, when L is equal to 1.7 pounds of VOC per gallon of coating and D is equal to 7.36 pounds of VOC per gallon of coating.
- (c) Pursuant to 326 IAC 8-1-2 (b), the enameling oven's VOC emission shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

- L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating
- D= Density of VOC in coating in pounds per gallon of VOC
- E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied

Actual solvent density shall be used to determine compliance of surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (d) Pursuant to 326 IAC 8-1-2(c), the equivalent overall control efficiency of the thermal oxidizer shall be no less than 91.1% or the required destruction efficiency demonstrated by the most recent stack testing, calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall control efficiency of the capture system and control device as a percentage.

#### D.4.1 Volatile Organic Compounds [326 IAC 8-2-8]

- (a) Pursuant to 326 IAC 8-2-8 (Magnet Wire Coating Operations), and CP 003-6199-00013 issued on February 11, 1997, the owner or operator shall not allow the discharge into the atmosphere of VOC in excess of 1.7 pounds VOC per gallon of coating, excluding water, as delivered to the applicator.
- (b) The equivalent pounds of VOC per gallon of coating solids (as applied) shall be limited to less than 2.21, when L is equal to 1.7 pounds of VOC per gallon of coating and D is equal to 7.36 pounds of VOC per gallon of coating.
- (c) Pursuant to 326 IAC 8-1-2 (b), the enameling oven's VOC emission shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

- L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating
- D= Density of VOC in coating in pounds per gallon of VOC
- E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied

Actual solvent density shall be used to determine compliance of surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (d) Pursuant to 326 IAC 8-1-2(c), the equivalent overall control efficiency of the thermal oxidizers shall be no less than 96.7% or the required destruction efficiency demonstrated by the most recent stack testing, calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall control efficiency of the capture system and control device as a percentage.

D.4210.1 Volatile Organic Compounds [326 IAC 8-2-8]

- (a) Pursuant to 326 IAC 8-2-8 (Magnet Wire Coating Operations) and CP 003-3268-00013 issued on February 2, 1994, the owner or operator shall not allow the discharge into the atmosphere of VOC in excess of 1.7 pounds VOC per gallon of coating, excluding water, as delivered to the applicator.
- (b) The equivalent pounds of VOC per gallon of coating solids (as applied) shall be limited to less than 2.21, when L is equal to 1.7 pounds of VOC per gallon of coating and D is equal to 7.36 pounds of VOC per gallon of coating.
- (c) Pursuant to 326 IAC 8-1-2 (b), the enameling oven's VOC emission shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

- L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating
- D= Density of VOC in coating in pounds per gallon of VOC
- E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied

Actual solvent density shall be used to determine compliance of surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (d) Pursuant to 326 IAC 8-1-2(c), the equivalent overall control efficiency of the thermal oxidizer shall be no less than 94.8% or the required destruction efficiency demonstrated by the most recent stack testing, calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall control efficiency of the capture system and control device as a percentage.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification (003-16769-00013) as the resolution to the appeals be approved.

### Conclusion

This permit modification shall be subject to the conditions of the attached permit 003-16769-00013.