



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
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(800) 451-6027  
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TO: Interested Parties / Applicant  
DATE: December 29, 2006  
RE: Rea Magnet Wire Company / 157-17638-00032  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval – Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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



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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Rea Magnet Wire Company  
2800 Concord Road  
Lafayette, Indiana 47909**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T157-17638-00032	
Issued by:	Issuance Date: December 29, 2006
Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Expiration Date: December 29, 2011

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary magnet wire coating operation.

Responsible Official:	Executive Vice President of Operations and Planning
Source Address:	2800 Concord Road, Lafayette, Indiana 47909
Mailing Address:	2800 Concord Road, Lafayette, Indiana 47909
Source Phone Number:	(765) 447-8006
SIC Code:	3357
County Location:	Tippecanoe
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Three (3) MOCO wire enameling ovens with internal catalytic oxidizers, identified as emissions units 417-418, 421-424 and 425-428, installed prior to January 1, 1980, with a maximum capacity rating of 88.80 thousand feet of wire per hour each, with emissions controlled by add-on thermal incinerators, and exhausting to stacks 5, 6 and 7, respectively.
- (b) Five (5) wire enameling ovens with internal thermal oxidizers and add-on thermal incinerators for control:
  - (1) Four (4) GEM gas fired wire enameling oven with internal thermal oxidizers, identified as emissions units 401-404, 429-432, 433-436 and 437-440, installed in 1982, with a maximum capacity rating of 31.68 thousand feet of wire per hour each, with emissions controlled by add-on thermal incinerators, and exhausting to stacks 1, 8, 9 and 10 respectively.
  - (2) One (1) GEI electric wire enameling oven with an internal thermal oxidizer, identified as emissions unit 441-444, installed in 1986, with a maximum capacity rating of 59.04 thousand feet of wire per hour, with emissions controlled by an add-on thermal incinerator, and exhausting to stack 51.
- (c) Six (6) SICME model NEM electric wire enameling ovens with internal thermal oxidizers for control:
  - (1) Two (2) SICME model NEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 625-632U and 625-632L, installed in 1986, with a maximum capacity rating of 48.24 thousand feet of wire per hour each, with emissions exhausting to stacks 52 and 69, respectively.

- (2) Four (4) SICME model NEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 633-644U, 633-644L, 645-656U and 645-656L, installed in 1987, with a maximum capacity rating of 72.36 thousand units per hour each, with emissions exhausting to stacks 76, 86, 77 and 85, respectively.
- (d) One (1) SICME model NEL electric wire enameling oven with an internal thermal oxidizer, identified as emissions unit 657-668, installed in 1987, with a maximum capacity rating of 144.72 thousand feet of wire per hour, with emissions exhausting to stack 78.
- (e) Eight (8) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 701-702, 703-704, 705-706, 707-708, 709-710, 711-712, 713-714 and 715-716, installed in 1994, with a maximum capacity rating of 92.28 thousand feet of wire per hour each, with emissions exhausting to stacks 115, 116, 117, 118, 119, 120, 121 and 122, respectively.
- (f) Three (3) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 595-596, 597-598 and 599-600, installed in 1994, with a maximum capacity rating of 188.64 thousand feet of wire per hour, with emissions exhausting to stacks 131, 132 and 133, respectively.
- (g) Two (2) SICME model NEVG gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 301-308 and 309-316, installed in 1995, with a maximum capacity rating of 51.36 thousand feet of wire per hour each, with emissions exhausting to stacks 88 and 89, respectively.
- (h) Three (3) SICME model NEMG gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 601-612, 613-624 and 669-680, installed in 1995, with a maximum capacity rating of 140.40 thousand feet of wire per hour each, with emissions exhausting to stacks 101, 100 and 87 respectively.
- (i) Eight (8) MAG HES-2 electric wire enameling ovens with internal thermal oxidizers, identified as emission units 741, 742, 743, 744, 745, 746, 747 and 748, installed in 1995, with a maximum capacity rating of 91.86 thousand feet of wire per hour each, with emissions exhausting to stacks 150, 151, 152, 153, 154, 155, 156 and 157, respectively.
- (j) Four (4) Weather-Rite V-22 gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 467/468/469/470, 475/476/477/478, 479, and 480, installed in 1995, with a maximum capacity rating of 72 thousand feet of wire per hour each, with emissions exhausting to stacks 148, 149, 67 and 68, respectively.
- (k) Four (4) Weather-Rite V-22 gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 445-447, 448-450, 461-463 and 464-466, installed in 1996, with a maximum capacity rating of 72 thousand feet of wire per hour each, with emissions exhausting to stacks 203, 204, 201, 202, respectively.
- (l) Four (4) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 725-726, 727-728, 729-730 and 731-732, installed in 1995, with a maximum capacity rating of 92.28 thousand feet of wire per hour each, with emissions exhausting to stacks 134, 135, 136, 137, respectively.
- (m) Four (4) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 733-734, 735-736, 737-738 and 739-740, installed in 1996, with a maximum capacity rating of 92.28 thousand feet of wire per hour each, with emissions exhausting to stacks 138, 139, 140 and 141, respectively.
- (n) Four (4) SICME model SEV electric wire enameling ovens with internal thermal oxidizers, identified as emission units 317-322, 323-328, 329-334 and 335-340, installed in 1996, with a maximum capacity rating of 52.20 thousand feet of wire per hour each, with emissions exhausting to stacks 144, 145, 146 and 147, respectively.

- (o) Four (4) SICME model SEM electric wire enameling ovens with an internal thermal oxidizer for control:
  - (1) Two (2) SICME model SEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 801-808 and 809-816, installed in 1996, with a maximum capacity rating of 163.8 thousand feet of wire per hour each, with emissions exhausting to stacks 142 and 143, respectively.
  - (2) Two (2) SICME model SEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 817-824 and 825-832, installed in 1997, with a maximum capacity rating of 190 thousand feet of wire per hour each, with emissions exhausting to stacks 205 and 206, respectively.
- (p) Eight (8) MAG HES-5 electric wire enameling ovens with internal thermal oxidizers, identified as emission units 833, 834, 835, 836, 837, 838, 839, and 840, installed in 1997, with a maximum capacity rating of 40.93 thousand feet of wire per hour each, with emissions exhausting to stacks 207, 208, 209, 210, 211, 212, 213 and 214, respectively.
- (q) Two (2) SICME model SML electric wire enameling ovens with internal thermal oxidizers, identified as emission units 753 and 754, installed in 1997, with a maximum capacity rating of 41 thousand feet of wire per hour each, with emissions exhausting to stacks 217 and 218, respectively.

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, including:
  - (1) One (1) 5.0 MMBtu/hr natural gas fired boiler, installed in 1996. [326 IAC 6-2-4]
  - (2) One (1) 5.0 MMBtu/hr natural gas fired boiler, installed in 1997. [326 IAC 6-2-4]

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

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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**

### **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] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]**

- (a) This permit, T157-17638-00032, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### **B.4 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.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 Provide Information [326 IAC 2-7-5(6)(E)]**

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

### **B.8 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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than or July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

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

- (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.10 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]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 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: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865

- (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  
Indianapolis, Indiana 46204-2251

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:

- (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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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- (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.

- (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)(8)]

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]**

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- (a) All terms and conditions of permits established prior to T157-17638-00032 and issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

**B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

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

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- (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  
Indianapolis, Indiana 46204-2251

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.

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.

**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]

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- (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 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

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- (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).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:

- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) 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) 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.

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

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- (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  
Indianapolis, Indiana 46204-2251  
  
Any such application shall 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)]

**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  
Indianapolis, Indiana 46204-2251

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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make 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)(1), (c)(1), and (e)(2).

(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 is not considered an application form, report or compliance certification. Therefore, the notification 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 emissions increases and decreases at 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.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

A modification, construction, or reconstruction is governed by the requirements of 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] [IC 13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, 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) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.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  
Indianapolis, Indiana 46204-2251  
  
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)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

**C.2 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.

**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.

**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).

**C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:

- (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

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 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

#### **C.7 Performance Testing [326 IAC 3-6]**

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- (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  
Indianapolis, Indiana 46204-2251

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 Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.8 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

#### **C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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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  
Indianapolis, Indiana 46204-2251

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.

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.10 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.11 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) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale.

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

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

**C.12 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 May 19, 1999.
- (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.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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

**C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
  - (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
    - (1) initial inspection and evaluation;
    - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
    - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
  - (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
    - (1) monitoring results;
    - (2) review of operation and maintenance procedures and records;
    - (3) inspection of the control device, associated capture system, and the process.
  - (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
  - (e) The Permittee shall maintain the following records:
    - (1) monitoring data;

- (2) monitor performance data, if applicable; and
- (3) corrective actions taken.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

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

The response action documents submitted pursuant to this condition do require the certification by the "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]**

**C.16 Emission Statement [326 IAC 2-6] [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]**

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- (a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
    - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
    - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

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

- (b) The 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.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present

or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or 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.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "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  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

**C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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.

**Source Specific Condition**

**C.20 Covered Containers**

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Pursuant to SPM 157-11787-00032, issued February 20, 2001:

- (a) The Permittee shall utilize enamel pumping systems that satisfy the following criteria:
  - (1) The return enamel line from the applicators must be direct piped and not running through or under a lid or cover.
  - (2) The portables must be filled with an autofeed from a central system or an auto drum pump and piped in solid, not by gravity, through a lid or opening.

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) Three (3) MOCO wire enameling ovens with internal catalytic oxidizers, identified as emission units 417-418, 421-424 and 425-428, installed prior to January 1, 1980, with a maximum capacity rating of 88.80 thousand feet of wire per hour each, with emissions controlled by add-on thermal incinerators, and exhausting to stacks 5, 6 and 7, respectively.

(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 HAP Minor Limit

In order to limit the source-wide emissions of a single HAP to less than ten (10) tons per year, and a combination of HAPs to less than twenty-five (25) tons per year, the Permittee shall limit the usage of HAP in the magnet wire ovens as follows:

- (a) The total usage of coatings, solvents, lubricants and cleanup solvents in all of the magnet wire ovens at this source shall be limited such that the potential to emit of a single HAP shall be limited to less than nine and five-tenths (9.5) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit, in conjunction with the potential to emit of a single HAP from insignificant activities at the source shall limit the source-wide emissions of any single HAP to less than ten (10) tons per year.
- (b) The total usage of coatings, solvents, lubricants and cleanup solvents in all of the magnet wire ovens at this source shall be limited such that the potential to emit of a combination of HAPs shall be limited to less than twenty-four (24.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit, in conjunction with the potential to emit of a combination of HAPs from insignificant activities at the source shall limit the source-wide emissions of any combination of HAPs to less than twenty-five (25) tons per year.

Compliance with these limits shall render the requirements of 40 CFR 63, Subpart M, not applicable to this source.

#### 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 Hazardous Air Pollutants (HAP)[326 IAC 8-1-4] [326 IAC 8-1-2(a)]

- (a) The Permittee shall operate the thermal oxidizers to achieve compliance with Condition D.1.1.
- (b) Compliance with the HAP emission limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (c) Compliance with the HAP emission limitations contained in Condition D.1.1 shall be determined within 30 days of the end of each month using the following equation:

$$\text{HAP emitted} = (\text{HAP}_U \times (1 - \text{HAP Control Efficiency \%})) + \text{uncontrolled HAP input}$$

Where:

$HAP_U$  = The total amount of controlled HAP used (in tons) at the magnet wire coating ovens.

#### D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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- (a) Within twelve (12) months of issuance of this permit, the Permittee shall perform HAP testing of the internal catalytic oxidizer and the external thermal incinerator combined, utilizing methods as approved by the Commissioner, for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration. Stack testing shall be performed in accordance with 326 IAC 3-6.
- (b) One representative thermal oxidizer from the three oxidizers controlling the three (3) MOCO magnet wire ovens listed in Section D.1 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 that would lead to a higher HAP loading in pounds per hour than what was used during the stack test required in (a) above, the Permittee shall conduct a performance test to verify HAP control efficiency as per Condition D.1.1 for thermal oxidizers using methods approved by the Commissioner.
- (d) For a higher HAP content coating than that used during the stack test in (a) above, the following procedure shall be followed:
  - (1) Calculate the new minimum required control efficiency for the new coating ( $E_{new}$ );
  - (2) Calculate the new maximum HAP loading ( $L_{new}$ ) for the higher HAP content enamel;
  - (3) Calculate the current maximum HAP loading ( $L_{current}$ );
  - (4) If  $E_{new}$  is lower than the last stack test control efficiency, and  $L_{new}$  is lower than  $L_{current}$ , Permittee shall be allowed to use the same destruction efficiency for calculations for the higher HAP content enamel.

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

##### D.1.5 Thermal Oxidizer Operation

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- (a) From the date of issuance of the Part 70 permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizer's 3 hour average temperature at or above 1150 deg F.
- (b) The Permittee shall determine the 3 hour block average minimum temperature 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 oxidizer at or above the 3 hour block average minimum temperature as observed during the compliant stack test to maintain an overall control efficiency of not less than ninety eight and five-tenths percent (98.5%) of volatile organic compound (VOC) in order to demonstrate compliance with Condition D.1.1.

##### D.1.6 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 of the thermal oxidizer. For the

purposes of this condition, continuous monitoring shall mean no less often than once per fifteen (15) minutes. The output from this monitoring system and the three hour average temperatures shall be recorded whenever the thermal oxidizer is in operation.

- (b) If the primary continuous monitoring system is not in operation, the oxidizer temperature will be recorded using some manner of secondary system, such as with back-up electro-mechanical hardware or manually if necessary. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of the thermal oxidizer. Continuous monitoring shall mean no less often than once per fifteen (15) minutes.
- (c) The oxidizer shall operate such that if the three-hour average temperature falls below the 3 hour block average minimum required temperature (setpoint) as determined by the latest stack test, corrective actions shall be taken to return the thermal oxidizer to at least the required minimum temperature setpoint within 15 minutes. Corrective action must return oxidizer temperature to or above the minimum setpoint within thirty (30) minutes of the corrective action, or the enamel flow to the oven shall be shut off. Failure to take corrective action or failure to shut off the enamel flow as stated above shall be considered a deviation from this permit.
- (d) All actions described in paragraph (c) above must be taken in accordance with Section C - Response to Excursions of Exceedances and failure to take action consistent with Section C - Response to Excursions of Exceedances shall be considered a deviation from this permit.

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

### **D.1.7 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1, D.1.5, and D.1.6 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 HAP emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The amount and HAP content of each coating, solvent, lubricant and cleanup solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The total HAP usage for each month;
  - (3) The weight of HAP usage for each compliance period.
  - (4) The weight of single HAPs and total HAPs emitted for each compliance period, based on HAP usage in the magnet wire ovens x (1 – HAP control efficiency %) + uncontrolled HAP input.
  - (5) Continuous temperature records and 3 hour average temperature records.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain the continuous temperature records and 3 hour average temperature records.
- (c) All records shall be maintained in accordance with Section C- General Record Keeping Requirements of this permit.

### **D.1.8 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

- (b) Five (5) wire enameling ovens with an internal thermal oxidizer and add-on thermal incinerators for control:
- (1) Four (4) GEM gas fired wire enameling oven with internal thermal oxidizers, identified as emission units 401-404, 429-432, 433-436 and 437-440, installed in 1982, with a maximum capacity rating of 31.68 thousand feet of wire per hour each, with emissions controlled by add-on thermal incinerators, and exhausting to stacks 1, 8, 9 and 10 respectively.
  - (2) One (1) GEI electric wire enameling oven with an internal thermal oxidizer, identified as emission unit 441-444, installed in 1986, with a maximum capacity rating of 59.04 thousand feet of wire per hour, with emissions controlled by an add-on thermal incinerator, and exhausting to stack 51.
- (c) Six (6) SICME model NEM electric wire enameling ovens with an internal thermal oxidizer for control:
- (1) Two (2) SICME model NEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 625-632U and 625-632L, installed in 1986, with a maximum capacity rating of 48.24 thousand feet of wire per hour each, with emissions exhausting to stacks 52 and 69, respectively.
  - (2) Four (4) SICME model NEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 633-644U, 633-644L, 645-656U and 645-656L, installed in 1987, with a maximum capacity rating of 72.36 thousand units per hour each, with emissions exhausting to stacks 76, 86, 77 and 85, respectively.
- (d) One (1) SICME model NEL electric wire enameling oven with an internal thermal oxidizer, identified as emission unit 657-668, installed in 1987, with a maximum capacity rating of 144.72 thousand feet of wire per hour, with emissions exhausting to stack 78.

(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 Prevention of Significant Deterioration [326 IAC 2-2]

- (a) Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer and thermal incinerator for each magnet wire enameling oven (units 401-404, 429-432, 433-436, 437-440 and 441-444, respectively) shall, in aggregate, achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.
- (b) Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for each magnet wire enameling oven (units 625-632U, 625-632L, 633-644U, 633-644L, 645-656U and 645-656L, respectively) shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.
- (c) Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for magnet wire enameling oven 657-668 shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.

#### D.2.2 HAP Minor Limit

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In order to limit the source-wide emissions of a single HAP to less than ten (10) tons per year, and a combination of HAPs to less than twenty-five (25) tons per year, the Permittee shall limit the usage of HAP in the magnet wire ovens as follows:

- (a) The total usage of coatings, solvents, lubricants and cleanup solvents in all of the magnet wire ovens at this source shall be limited such that the potential to emit of a single HAP shall be limited to less than nine and five-tenths (9.5) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit, in conjunction with the potential to emit of a single HAP from insignificant activities at the source shall limit the source-wide emissions of any single HAP to less than ten (10) tons per year.
- (b) The total usage of coatings, solvents, lubricants and cleanup solvents in all of the magnet wire ovens at this source shall be limited such that the potential to emit of a combination of HAPs shall be limited to less than twenty-four (24.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit, in conjunction with the potential to emit of a combination of HAPs from insignificant activities at the source shall limit the source-wide emissions of any combination of HAPs to less than twenty-five (25) tons per year.

Compliance with these limits shall render the requirements of 40 CFR 63, Subpart M, not applicable to this source.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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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.2.4 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) [326 IAC 8-1-4][326 IAC 8-1-2]

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- (a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the internal thermal oxidizers and thermal incinerators at all times the respective facilities are in operation in order to achieve compliance with Conditions D.2.1 and D.2.2.
- (b) Compliance with the HAP emission limitations contained in Condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (c) Compliance with the HAP emission limitations contained in Condition D.1.1 shall be determined within 30 days of the end of each month using the following equation:

$$\text{HAP emitted} = (\text{HAP}_U \times (1 - \text{HAP Control Efficiency \%})) + \text{uncontrolled HAP input}$$

Where:

$\text{HAP}_U$  = The total amount of controlled HAP used (in tons) at the magnet wire coating ovens.

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

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- (a) Prior to April 1, 2008, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.2.1 for the internal thermal oxidizer and thermal incinerator using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 401-404, 429-432, 433-436, 437-440 or 441-444. 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 (5) years from the date of this valid compliance demonstration.

- (b) Prior to December 16, 2009, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.2.1 for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 625-632U, 625-632L, 633-644U, 633-644L, 645-656U or 645-656L. 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 (5) years from the date of this valid compliance demonstration.
- (c) Prior to April 12, 2010, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.2.1 for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on emission unit 657-668. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.
- (d) Before using a coating that would lead to a higher VOC loading in pounds per hour than what was used during the stack tests required in (a), (b), and (c) above, the Permittee shall conduct a performance test to verify VOC control efficiency as per Condition D.2.1 for thermal oxidizers using methods approved by the Commissioner.
- (e) For a higher VOC content coating than that used during the stack tests in (a), (b), and (c) above, the following procedure shall be followed:
  - (1) Calculate the new maximum VOC loading ( $L_{new}$ ) for the higher VOC content enamel;
  - (2) Calculate the current maximum VOC loading ( $L_{current}$ );
  - (3) If  $L_{new}$  is lower than  $L_{current}$ , Permittee shall be allowed to use the higher VOC content enamel.
- (f) Within twelve (12) months of issuance of this permit, the Permittee shall perform HAP testing of the internal thermal oxidizer (or for ovens equipped with a thermal incinerator, the internal thermal oxidizer and the external thermal incinerator combined) utilizing methods as approved by the Commissioner, for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM. The test shall be performed on one (1) oven in each group of similar ovens. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration. Stack testing shall be performed in accordance with 326 IAC 3-6.
- (g) For a higher HAP content coating than that used during the stack tests in (f) above, the following procedure shall be followed:
  - (1) Calculate the new maximum HAP loading ( $L_{new}$ ) for the higher VOC content enamel;
  - (2) Calculate the current maximum HAP loading ( $L_{current}$ );
  - (3) If  $L_{new}$  is lower than  $L_{current}$ , Permittee shall be allowed to use the same destruction efficiency for calculations for the higher HAP content enamel.

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

#### **D.2.6 Thermal Oxidizer Operation**

- (a) Until the approved stack test results are available for ovens 401-404, 429-432, 433-436,

437-440 and 441-444, the Permittee shall operate the thermal oxidizer's 3 hour average temperature at or above 1250 degrees Fahrenheit.

- (b) Until the approved stack test results are available for ovens 625-632U, 625-632L, 633-644U, 633-644L, 645-656U or 645-656L, the Permittee shall operate the thermal oxidizer's 3 hour average temperature of 1154 degrees Fahrenheit.
- (c) Until the approved stack test results are available for oven 657-668, the Permittee shall operate the thermal oxidizer's 3 hour average temperature of 1250 degrees Fahrenheit.
- (d) The Permittee shall determine the 3 hour block average minimum temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.2.1 and D.2.2, as approved by IDEM.
- (e) In order to demonstrate compliance with Conditions D.2.1 and D.2.2, from the date of the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3 hour block average minimum temperature as observed during the compliant stack test to maintain an overall control efficiency of not less than ninety eight and five-tenths percent (98.5%) of volatile organic compound (VOC).

#### D.2.7 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 of the thermal oxidizer. For the purposes of this condition, continuous monitoring shall mean no less often than once per fifteen (15) minutes. The output from this monitoring system and the three hour average temperatures shall be recorded whenever the thermal oxidizer is in operation.
- (b) If the primary continuous monitoring system is not in operation, the oxidizer temperature will be recorded using some manner of secondary system, such as with back-up electro-mechanical hardware or manually if necessary. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of the thermal oxidizer. Continuous monitoring shall mean no less often than once per fifteen (15) minutes.
- (c) The oxidizer shall operate such that if the three-hour average temperature falls below the 3 hour block average minimum required temperature (setpoint) as determined by the latest stack test, corrective actions shall be taken to return the thermal oxidizer to at least the required minimum temperature setpoint within 15 minutes. Corrective action must return oxidizer temperature to or above the minimum setpoint within thirty (30) minutes of the corrective action, or the enamel flow to the oven shall be shut off. Failure to take corrective action or failure to shut off the enamel flow as stated above shall be considered a deviation from this permit.
- (d) All actions described in paragraph (c) above must be taken in accordance with Section C - Response to Excursions of Exceedances and failure to take action consistent with Section C - Response to Excursions of Exceedances shall be considered a deviation from this permit.

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

#### D.2.8 Record Keeping Requirements

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- (a) To document compliance with Conditions D.2.1 and D.2.2, 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 and HAP emission limits established in Conditions D.2.1 and D.2.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The amount and VOC and HAP content of each coating, solvent, lubricant and cleanup solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The total VOC and HAP usage for each month;
  - (3) The weight of VOC and HAP usage for each compliance period.
  - (4) The weight of single HAPs and total HAPs emitted for each compliance period, based on HAP usage in the magnet wire ovens x (1 – HAP control efficiency %) + uncontrolled HAP input.
  - (5) The weight of VOCs emitted for each compliance period, based on VOC usage in the magnet wire ovens x (1 – overall control efficiency %).
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain the continuous temperature records and 3 hour average temperature records.
- (c) All records shall be maintained in accordance with Section C – General Record Keeping Requirements of this permit.

#### D.2.9 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the addresses 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (e) Eight (8) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 701-702, 703-704, 705-706, 707-708, 709-710, 711-712, 713-714 and 715-716, installed in 1994, with a maximum capacity rating of 92.28 thousand feet of wire per hour each, with emissions exhausting to stacks 115, 116, 117, 118, 119, 120, 121 and 122, respectively.
- (f) Three (3) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 595-596, 597-598 and 599-600, installed in 1994, with a maximum capacity rating of 188.64 thousand feet of wire per hour, with emissions exhausting to stacks 131, 132 and 133, respectively.
- (g) Two (2) SICME model NEVG gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 301-308 and 309-316, installed in 1995, with a maximum capacity rating of 51.36 thousand feet of wire per hour each, with emissions exhausting to stacks 88 and 89, respectively.
- (h) Three (3) SICME model NEMG gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 601-612, 613-624 and 669-680, installed in 1995, with a maximum capacity rating of 140.40 thousand feet of wire per hour each, with emissions exhausting to stacks 101, 100 and 87 respectively.
- (i) Eight (8) MAG HES-2 electric wire enameling ovens with internal thermal oxidizers, identified as emission units 741, 742, 743, 744, 745, 746, 747 and 748, installed in 1995, with a maximum capacity rating of 91.86 thousand feet of wire per hour each, with emissions exhausting to stacks 150, 151, 152, 153, 154, 155, 156 and 157, respectively.
- (j) Four (4) Weather-Rite V-22 gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 467/468/469/470, 475/476/477/478, 479 and 480, installed in 1995, with a maximum capacity rating of 72 thousand feet of wire per hour each, with emissions exhausting to stacks 148, 149, 67 and 68, respectively.
- (k) Four (4) Weather-Rite V-22 gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 445-447, 448-450, 461-463 and 464-466, installed in 1996, with a maximum capacity rating of 72 thousand feet of wire per hour each, with emissions exhausting to stacks 203, 204, 201, 202, respectively.
- (l) Four (4) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 725-726, 727-728, 729-730 and 731-732, installed in 1995, with a maximum capacity rating of 92.28 thousand feet of wire per hour each, with emissions exhausting to stacks 134, 135, 136, 137, respectively.
- (m) Four (4) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 733-734, 735-736, 737-738 and 739-740, installed in 1996, with a maximum capacity rating of 92.28 thousand feet of wire per hour each, with emissions exhausting to stacks 138, 139, 140 and 141, respectively.
- (n) Four (4) SICME model SEV electric wire enameling ovens with internal thermal oxidizers, identified as emission units 317-322, 323-328, 329-334 and 335-340, installed in 1996, with a maximum capacity rating of 52.20 thousand feet of wire per hour each, with emissions exhausting to stacks 144, 145, 146 and 147, respectively.

### SECTION D.3 FACILITY OPERATION CONDITIONS (Continued)

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

- (o) Four (4) SICME model SEM electric wire enameling ovens with an internal thermal oxidizer for control:
  - (1) Two (2) SICME model SEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 801-808 and 809-816, installed in 1996, with a maximum capacity rating of 163.8 thousand feet of wire per hour each, with emissions exhausting to stacks 142 and 143, respectively.
  - (2) Two (2) SICME model SEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 817-824 and 825-832, installed in 1997, with a maximum capacity rating of 190 thousand feet of wire per hour each, with emissions exhausting to stacks 205 and 206, respectively.
- (p) Eight (8) MAG HES-5 electric wire enameling ovens with internal thermal oxidizers, identified as emission units 833, 834, 835, 836, 837, 838, 839, and 840, installed in 1997, with a maximum capacity rating of 40.93 thousand feet of wire per hour each, with emissions exhausting to stacks 207, 208, 209, 210, 211, 212, 213 and 214, respectively.
- (q) Two (2) SICME model SML electric wire enameling ovens with internal thermal oxidizers, identified as emission units 753 and 754, installed in 1997, with a maximum capacity rating of 41 thousand feet of wire per hour each, with emissions exhausting to stacks 217 and 218, respectively.

(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 Prevention of Significant Deterioration [326 IAC 2-2]

- (a) Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for each magnet wire enameling oven (units 701-702, 703-704, 705-706, 707-708, 709-710, 711-712, 713-714, 715-716, 595-596, 597-598 and 599-600, respectively) shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.
- (b) Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for magnet wire enameling oven 681-696 shall achieve an overall efficiency of at least ninety-eight and nine tenths percent (98.9%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.
- (c) Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for each magnet wire enameling oven (units 741, 742, 743, 744, 745, 746, 747 and 748, respectively) shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.
- (d) Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for each magnet wire enameling oven (units 725-726, 727-728, 729-730, 731-732, 733-734, 735-736, 737-738 and 739-740, respectively) shall achieve an overall efficiency of at least ninety-seven and five tenths percent (97.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.
- (e) Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for each magnet wire enameling oven (units 801-808, 809-816, 817-824 and 825-832, respectively) shall achieve an overall efficiency of at least ninety-eight and five tenths

- percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.
- (f) Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for each magnet wire enameling oven (units 833, 834, 835, 836, 837, 838, 839 and 840, respectively) shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.
  - (g) Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for each magnet wire enameling oven (units 753 and 754, respectively) shall achieve an overall efficiency of at least ninety-nine percent (99.0%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.
  - (h) Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for each magnet wire enameling oven (units 601-612, 613-624 and 669-680, respectively) shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 not applicable.
  - (i) Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for each magnet wire enameling oven (units 469/471/472, 473-474, 479, 480, 445-447, 448-450, 461-463 and 464-466, respectively) shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 not applicable.
  - (j) Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for each magnet wire enameling oven (units 301-308 and 309-316, respectively) shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 not applicable.
  - (k) Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for each magnet wire enameling oven (units 317-322, 323-328, 329-334 and 335-340, respectively) shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 not applicable.

#### D.3.2 HAP Minor Limit

In order to limit the source-wide emissions of a single HAP to less than ten (10) tons per year, and a combination of HAPs to less than twenty-five (25) tons per year, the Permittee shall limit the usage of HAP in the magnet wire ovens as follows:

- (a) The total usage of coatings, solvents, lubricants and cleanup solvents in all of the magnet wire ovens at this source shall be limited such that the potential to emit of a single HAP shall be limited to less than nine and five-tenths (9.5) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit, in conjunction with the potential to emit of a single HAP from insignificant activities at the source shall limit the source-wide emissions of any single HAP to less than ten (10) tons per year.
- (b) The total usage of coatings, solvents, lubricants and cleanup solvents in all of the magnet wire ovens at this source shall be limited such that the potential to emit of a combination of HAPs shall be limited to less than twenty-four (24.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit, in conjunction with the potential to emit of a combination of HAPs from insignificant activities at the source shall limit the source-wide emissions of any combination of HAPs to less than twenty-five (25) tons per year.

Compliance with these limits shall render the requirements of 40 CFR 63, Subpart M, not applicable to this source.

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 these facilities and their control devices.

**Compliance Determination Requirements**

D.3.4 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) [326 IAC 8-1-4][326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the internal thermal oxidizers and thermal incinerators at all times the respective facilities are in operation in order to achieve compliance with Conditions D.3.1 and 3.2.
- (b) Compliance with the HAP emission limitations contained in Condition D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (c) Compliance with the HAP emission limitations contained in Condition D.1.1 shall be determined within 30 days of the end of each month using the following equation:

$$\text{HAP emitted} = (\text{HAP}_U \times (1 - \text{HAP Control Efficiency \%})) + \text{uncontrolled HAP input}$$

Where:

$\text{HAP}_U$  = The total amount of controlled HAP used (in tons) at the magnet wire coating ovens.

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

- (a) Prior to June 8, 2010, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 701-702, 703-704, 705-706, 707-708, 709-710, 711-712, 713-714, 715-716, 595-596, 597-598 or 599-600. 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 (5) years from the date of this valid compliance demonstration.
- (b) Prior to December 1, 2008, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on emission unit 681-696. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.
- (c) Within twelve (12) months of issuance of this permit, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 741, 742, 743, 744, 745, 746, 747 or 748. 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 (5) years from the date of this valid compliance demonstration.
- (d) Prior to December 7, 2010, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 725-726, 727-728, 729-730, 731-732, 733-734, 735-736, 737-738 or 739-740. 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 (5) years from the date of this valid compliance demonstration.

- (e) Within twelve (12) months of issuance of this permit, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 801-808, 809-816, 817-824 or 825-832. 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 (5) years from the date of this valid compliance demonstration.
- (f) Prior to April 24, 2011, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 833, 834, 835, 836, 837, 838, 839 and 840. 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 (5) years from the date of this valid compliance demonstration.
- (g) Prior to April 25, 2011, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 753 or 754. 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 (5) years from the date of this valid compliance demonstration.
- (h) Prior to August 1, 2008, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 601-612, 613-624 or 669-680. 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 (5) years from the date of this valid compliance demonstration.
- (i) Within twelve (12) months of issuance of this permit, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 469/471/472, 473-474, 479, 480, 445-447, 448-450, 461-463 and 464-466. 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 (5) years from the date of this valid compliance demonstration.
- (j) Within twelve (12) months of issuance of this permit, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 301-308 or 309-316. 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 (5) years from the date of this valid compliance demonstration.
- (k) Within twelve (12) months of issuance of this permit, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 317-322, 323-328, 329-334 or 335-340. 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 (5) years from the date of this valid compliance demonstration.
- (l) Before using a coating that would lead to a higher VOC loading in pounds per hour than what was used during the stack tests required in (a), (b), and (c) above, the Permittee shall conduct a performance test to verify VOC control efficiency as per Condition D.2.1 for thermal oxidizers using methods approved by the Commissioner.
  - (m) For a higher VOC content coating than that used during the stack tests in (a), (b), and (c) above, the following procedure shall be followed:
    - (1) Calculate the new maximum VOC loading ( $L_{new}$ ) for the higher VOC content enamel;
    - (2) Calculate the current maximum VOC loading ( $L_{current}$ );
    - (3) If  $L_{new}$  is lower than  $L_{current}$ , Permittee shall be allowed to use the higher VOC content enamel.
  - (n) Within twelve (12) months of issuance of this permit, the Permittee shall perform HAP testing of the internal thermal oxidizer (or for ovens equipped with a thermal incinerator, the internal thermal oxidizer and the external thermal incinerator combined) utilizing methods as approved by the Commissioner, for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM. The test shall be performed on one (1) oven in each group of similar ovens. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration. Stack testing shall be performed in accordance with 326 IAC 3-6.
  - (o) For a higher HAP content coating than that used during the stack tests in (n) above, the following procedure shall be followed:
    - (1) Calculate the new maximum HAP loading ( $L_{new}$ ) for the higher VOC content enamel;
    - (2) Calculate the current maximum HAP loading ( $L_{current}$ );
    - (3) If  $L_{new}$  is lower than  $L_{current}$ , Permittee shall be allowed to use the same destruction efficiency for calculations for the higher HAP content enamel.

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

#### **D.3.6 Thermal Oxidizer Operation**

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- (a) Until the approved stack test results are available for ovens 701-702, 703-704, 705-706, 707-708, 709-710, 711-712, 713-714, 715-716, 595-596, 597-598 and 599-600, the Permittee shall operate the thermal oxidizer's 3 hour average temperature at or above 1199 degrees Fahrenheit.
- (b) Until the approved stack test results are available for ovens 741, 742, 743, 744, 745, 746, 747 and 748, the Permittee shall operate the thermal oxidizer's 3 hour average temperature at or above 922 degrees Fahrenheit.
- (c) Until the approved stack test results are available for ovens 725-726, 727-728, 729-730, 731-732, 733-734, 735-736, 737-738 and 739-740, the Permittee shall operate the thermal oxidizer's 3 hour average temperature at or above 1050 degrees Fahrenheit.
- (d) Until the approved stack test results are available for ovens 801-808, 809-816, 817-824 and 825-832, the Permittee shall operate the thermal oxidizer's 3 hour average temperature at or above 1025 degrees Fahrenheit.

- (e) Until the approved stack test results are available for ovens 833, 834, 835, 836, 837, 838, 839 and 840, the Permittee shall operate the thermal oxidizer's 3 hour average temperature at or above 966 degrees Fahrenheit.
- (f) Until the approved stack test results are available for ovens 753 and 754, the Permittee shall operate the thermal oxidizer's 3 hour average temperature of 1100 degrees Fahrenheit.
- (g) Until the approved stack test results are available for ovens 601-612, 613-624 and 669-680, the Permittee shall operate the thermal oxidizer's 3 hour average temperature at or above 1433 degrees Fahrenheit.
- (h) Until the approved stack test results are available for ovens 469/471/472, 473-474, 479, 480, 445-447, 448-450, 461-463 and 464-466, the Permittee shall operate the thermal oxidizer's 3 hour average temperature at or above 1375 degrees Fahrenheit.
- (i) Until the approved stack test results are available for ovens 301-308 and 309-316, the Permittee shall operate the thermal oxidizer's 3 hour average temperature at or above 1190 degrees Fahrenheit.
- (j) Until the approved stack test results are available for ovens 317-322, 323-328, 329-334 and 335-340, the Permittee shall operate the thermal oxidizer's 3 hour average temperature at or above 1250 degrees Fahrenheit.
- (k) The Permittee shall determine the 3 hour block average minimum 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.
- (l) In order to demonstrate compliance with Conditions D.3.1 and D.3.2, from the date of the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3 hour block average minimum temperature as observed during the compliant stack test to maintain an overall control efficiency of not less than ninety eight and five-tenths percent (98.5%) of volatile organic compound (VOC).

#### D.3.7 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature of the thermal oxidizer. For the purposes of this condition, continuous monitoring shall mean no less often than once per fifteen (15) minutes. The output from this monitoring system and the three hour average temperatures shall be recorded whenever the thermal oxidizer is in operation.
- (b) If the primary continuous monitoring system is not in operation, the oxidizer temperature will be recorded using some manner of secondary system, such as with back-up electro-mechanical hardware or manually if necessary. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of the thermal oxidizer. Continuous monitoring shall mean no less often than once per fifteen (15) minutes.
- (c) The oxidizer shall operate such that if the three-hour average temperature falls below the 3 hour block average minimum required temperature (setpoint) as determined by the latest stack test, corrective actions shall be taken to return the thermal oxidizer to at least the required minimum temperature setpoint within 15 minutes. Corrective action must return oxidizer temperature to or above the minimum setpoint within thirty (30) minutes of the corrective action, or the enamel flow to the oven shall be shut off. Failure to take corrective action or failure to shut off the enamel flow as stated above shall be considered a deviation from this permit.
- (d) All actions described in paragraph (c) above must be taken in accordance with Section C - Response to Excursions of Exceedances and failure to take action consistent with

Section C - Response to Excursions of Exceedances shall be considered a deviation from this permit.

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

#### **D.3.8 Record Keeping Requirements**

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- (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 and HAP emission limits established in Conditions D.3.1 and D.3.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC and HAP content of each coating, solvent, lubricant and cleanup solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The total VOC and HAP usage for each month;
  - (3) The weight of VOC and HAP usage for each compliance period.
  - (4) The weight of single HAPs and total HAPs emitted for each compliance period, based on HAP usage in the magnet wire ovens x (1 – overall control efficiency %) + uncontrolled HAP input.
  - (5) The weight of VOCs emitted for each compliance period, based on VOC usage in the magnet wire ovens x (1 – overall control efficiency %).
- (b) To document compliance with Condition D.3.7, the Permittee shall maintain the continuous temperature records and 3 hour average temperature records.
- (c) All records shall be maintained in accordance with Section C – General Record Keeping Requirements of this permit.

#### **D.3.9 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.3.2 shall be submitted to the addresses 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.4

## FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
- (1) One (1) 5.0 MMBtu/hr natural gas fired boiler, installed in 1996. [326 IAC 6-2-4]
  - (2) One (1) 5.0 MMBtu/hr natural gas fired boiler, installed in 1997. [326 IAC 6-2-4]

(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 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate emissions from the two (2) 5.0 MMBtu/hr natural gas fired boilers shall be limited to 0.599 lb/MMBtu. The following equation is used to determine the emissions limit:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity in million Btu/hr (MMBtu/hr) heat input.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Rea Magnet Wire Company  
Source Address: 2800 Concord Road, Lafayette, Indiana 47905  
Mailing Address: 2800 Concord Road, Lafayette, Indiana 47905  
Part 70 Permit No.: T157-17638-00032

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Rea Magnet Wire Company  
Source Address: 2800 Concord Road, Lafayette, Indiana 47905  
Mailing Address: 2800 Concord Road, Lafayette, Indiana 47905  
Part 70 Permit No.: T157-17638-00032

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.</li></ul> |
|--|

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
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**

**Part 70 Quarterly Report**

Source Name: Rea Magnet Wire Company  
Source Address: 2800 Concord Road, Lafayette, Indiana 47905  
Mailing Address: 2800 Concord Road, Lafayette, Indiana 47905  
Part 70 Permit No.: T157-17638-00032  
Facility: All magnet wire ovens  
Parameter: Single HAP: Total emissions, including coatings, solvents, and lubricants.  
Limit: Less than nine and five-tenths (9.5) tons of any single HAP per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**Part 70 Quarterly Report**

Source Name: Rea Magnet Wire Company  
Source Address: 2800 Concord Road, Lafayette, Indiana 47905  
Mailing Address: 2800 Concord Road, Lafayette, Indiana 47905  
Part 70 Permit No.: T157-17638-00032  
Facility: All magnet wire ovens  
Parameter: Combination of HAPs: Total emissions, including coatings, solvents, and lubricants.  
Limit: Less than twenty-four (24.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

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

Source Name: Rea Magnet Wire Company  
 Source Address: 2800 Concord Road, Lafayette, Indiana 47905  
 Mailing Address: 2800 Concord Road, Lafayette, Indiana 47905  
 Part 70 Permit No.: T157-17638-00032

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

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<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>	
<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 Part 70 Operating Permit Renewal

#### Source Background and Description

Source Name:	Rea Magnet Wire Company
Source Location:	2800 Concord Road, Lafayette, Indiana 47909
County:	Tippecanoe
SIC Code:	3357
Operation Permit No.:	157-6960-00032
Operation Permit Issuance Date:	February 18, 1999
Permit Renewal No.:	157-17638-00032
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Rea Magnet Wire Company relating to the operation of a stationary magnet wire coating operation.

#### Permitted Emission Units and Pollution Control Equipment

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

- (a) Three (3) MOCO wire enameling ovens with internal catalytic oxidizers, identified as emissions units 417-418, 421-424 and 425-428, installed prior to January 1, 1980, with a maximum capacity rating of 88.80 thousand feet of wire per hour each, with emissions controlled by add-on thermal incinerators, and exhausting to stacks 5, 6 and 7, respectively.
- (b) Five (5) wire enameling ovens with internal thermal oxidizers and add-on thermal incinerators for control:
  - (1) Four (4) GEM gas fired wire enameling oven with internal thermal oxidizers, identified as emissions units 401-404, 429-432, 433-436 and 437-440, installed in 1982, with a maximum capacity rating of 31.68 thousand feet of wire per hour each, with emissions controlled by add-on thermal incinerators, and exhausting to stacks 1, 8, 9 and 10 respectively.
  - (2) One (1) GEI electric wire enameling oven with an internal thermal oxidizer, identified as emissions unit 441-444, installed in 1986, with a maximum capacity rating of 59.04 thousand feet of wire per hour, with emissions controlled by an add-on thermal incinerator, and exhausting to stack 51.
- (c) Six (6) SICME model NEM electric wire enameling ovens with internal thermal oxidizers for control:
  - (1) Two (2) SICME model NEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 625-632U and 625-632L, installed in 1986, with a maximum capacity rating of 48.24 thousand feet of wire per hour each, with emissions exhausting to stacks 52 and 69, respectively.
  - (2) Four (4) SICME model NEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 633-644U, 633-644L, 645-656U and 645-656L, installed in 1987, with a maximum capacity rating of 72.36 thousand units

per hour each, with emissions exhausting to stacks 76, 86, 77 and 85, respectively.

- (d) One (1) SICME model NEL electric wire enameling oven with an internal thermal oxidizer, identified as emissions unit 657-668, installed in 1987, with a maximum capacity rating of 144.72 thousand feet of wire per hour, with emissions exhausting to stack 78.
- (e) Eight (8) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 701-702, 703-704, 705-706, 707-708, 709-710, 711-712, 713-714 and 715-716, installed in 1994, with a maximum capacity rating of 92.28 thousand feet of wire per hour each, with emissions exhausting to stacks 115, 116, 117, 118, 119, 120, 121 and 122, respectively.
- (f) Three (3) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 595-596, 597-598 and 599-600, installed in 1994, with a maximum capacity rating of 188.64 thousand feet of wire per hour, with emissions exhausting to stacks 131, 132 and 133, respectively.
- (g) Two (2) SICME model NEVG gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 301-308 and 309-316, installed in 1995, with a maximum capacity rating of 51.36 thousand feet of wire per hour each, with emissions exhausting to stacks 88 and 89, respectively.
- (h) Three (3) SICME model NEMG gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 601-612, 613-624 and 669-680, installed in 1995, with a maximum capacity rating of 140.40 thousand feet of wire per hour each, with emissions exhausting to stacks 101, 100 and 87 respectively.
- (i) Eight (8) MAG HES-2 electric wire enameling ovens with internal thermal oxidizers, identified as emission units 741, 742, 743, 744, 745, 746, 747 and 748, installed in 1995, with a maximum capacity rating of 91.86 thousand feet of wire per hour each, with emissions exhausting to stacks 150, 151, 152, 153, 154, 155, 156 and 157, respectively.
- (j) Four (4) Weather-Rite V-22 gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 467/468/469/470, 475/476/477/478, 479, and 480, installed in 1995, with a maximum capacity rating of 72 thousand feet of wire per hour each, with emissions exhausting to stacks 148, 149, 67 and 68, respectively.
- (k) Four (4) Weather-Rite V-22 gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 445-447, 448-450, 461-463 and 464-466, installed in 1996, with a maximum capacity rating of 72 thousand feet of wire per hour each, with emissions exhausting to stacks 203, 204, 201, 202, respectively.
- (l) Four (4) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 725-726, 727-728, 729-730 and 731-732, installed in 1995, with a maximum capacity rating of 92.28 thousand feet of wire per hour each, with emissions exhausting to stacks 134, 135, 136, 137, respectively.
- (m) Four (4) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 733-734, 735-736, 737-738 and 739-740, installed in 1996, with a maximum capacity rating of 92.28 thousand feet of wire per hour each, with emissions exhausting to stacks 138, 139, 140 and 141, respectively.
- (n) Four (4) SICME model SEV electric wire enameling ovens with internal thermal oxidizers, identified as emission units 317-322, 323-328, 329-334 and 335-340, installed in 1996, with a maximum capacity rating of 52.20 thousand feet of wire per hour each, with emissions exhausting to stacks 144, 145, 146 and 147, respectively.

- (o) Four (4) SICME model SEM electric wire enameling ovens with an internal thermal oxidizer for control:
  - (1) Two (2) SICME model SEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 801-808 and 809-816, installed in 1996, with a maximum capacity rating of 163.8 thousand feet of wire per hour each, with emissions exhausting to stacks 142 and 143, respectively.
  - (2) Two (2) SICME model SEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 817-824 and 825-832, installed in 1997, with a maximum capacity rating of 190 thousand feet of wire per hour each, with emissions exhausting to stacks 205 and 206, respectively.
- (p) Eight (8) MAG HES-5 electric wire enameling ovens with internal thermal oxidizers, identified as emission units 833, 834, 835, 836, 837, 838, 839, and 840, installed in 1997, with a maximum capacity rating of 40.93 thousand feet of wire per hour each, with emissions exhausting to stacks 207, 208, 209, 210, 211, 212, 213 and 214, respectively.
- (q) Two (2) SICME model SML electric wire enameling ovens with internal thermal oxidizers, identified as emission units 753 and 754, installed in 1997, with a maximum capacity rating of 41 thousand feet of wire per hour each, with emissions exhausting to stacks 217 and 218, respectively.

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted emission units operating at this source during this review process.

#### **Insignificant Activities**

The source also consists of the following insignificant activities, 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, including:
  - (1) One (1) 5.0 MMBtu/hr natural gas fired boiler, installed in 1996. [326 IAC 6-2-4]
  - (2) One (1) 5.0 MMBtu/hr natural gas fired boiler, installed in 1997. [326 IAC 6-2-4]
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,00,000 Btu per hour.
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, as filling tanks, locomotives, automobiles having a storage capacity less than or equal to 10,500 gallons.
- (d) VOC and HAP storage containers including:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  - (2) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
- (e) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (f) Machining where an aqueous cutting coolant continuously floods the machining interface.

- (g) Cleaners and solvents characterized as follows:
  - (1) Having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (or 100 degrees F) or;
  - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F);

The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (h) Closed loop heating and cooling systems.
- (i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (j) Structural steel fabrication activities, including:
  - (1) Cutting 20,000 linear feet or less of one inch (1") plate or equivalent.
  - (2) Using 80 tons or less of welding consumables.
- (k) Activities associated with the treatment of wastewater streams and with an oil and grease content less than or equal to 1% by volume.
- (l) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (m) Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under a NESHAP.
- (n) Quenching operations used with heat treating processes.
- (o) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (p) Heat exchanger cleaning and repair.
- (q) Process vessel degassing and cleaning to prepare for internal repairs.
- (r) Asbestos abatement projects regulated by 326 IAC 14-10.
- (s) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (t) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (u) Blowdown for any of the following: sight glass; boiler, compressors, pumps and cooling tower.
- (v) On-site fire and emergency response training approved by the department.
- (w) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower, consisting of emergency generators.

- (x) Stationary fire pumps (Electric)
- (y) Purge double block and bleed valves.
- (z) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (aa) Magnet wire lubricating stations for applying lube prior to rewinding wire for packaging.
- (bb) Activities with emissions equal to or less than the following thresholds: 3 lb/hr and 15 lb/day VOC; 5 lb/day or 1.0 ton/yr of a single HAP, and 12.5 lb/day or 2.5 ton/yr of any combination of HAPs, consisting of:
  - (1) Eight (8) 10,000 gallon storage tanks containing coatings, solvents, and/or lubricants; and
  - (2) Two (2) 4,000 gallon storage tanks containing coatings, solvents, and/or lubricants.

### Existing Approvals

The source has been operating under the following previous approvals:

- (a) Operating Permit T157-6960-00032, issued February 18, 1999;
- (b) Minor Permit Modification 157-10590-00032, issued March 9, 1999;
- (c) Significant Permit Modification 157-11787-00032, issued February 20, 2001;
- (d) Administrative Amendment 157-14638-00032, issued September 24, 2001; and
- (e) Reopening 157-13496-00032, January 8, 2002.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 permit:

- (a) All conditions from Section D.1 of T157-6960-00032, issued February 18, 1999 (which includes revisions from SPM 157-11787-00032, issued February 20, 2001).

Reason not incorporated:

Section D.1 of the initial Part 70 permit pertained to six (6) V-12 wire enameling ovens previously identified as ovens 367-368, 369-370, 365-366, 371-372, 381-382, and 383-384. These units have been removed from the source.

- (b) Conditions from Sections D.4 and D.8 of Operating Permit T157-6960-00032, issued February 18, 1999, applied emission requirements pursuant to 326 IAC 8-2-8 to the eight (8) V-22 ovens and the three (3) NEMG ovens. These requirements have been removed.

Reason not incorporated: A review of calculations done with original data supplied by the source and included in the original permit documents shows that the PTE for VOC from each of these ovens is less than fifteen (15) pounds per day. Therefore, the requirements of 326 IAC 8-2-8 for ovens with actual emissions greater than fifteen (15) pounds per day do not apply to these ovens.

- (c) All conditions from Section D.11 of T157-6960-00032, issued February 18, 1999 have been removed.

Reason not incorporated:

Section D.11 of the initial Part 70 permit pertained to one (1) NORG oven identified as 681-696. This unit has been removed from the source.

- (d) Conditions D.12.1 and D.13.1 of T157-6960-00032, issued February 18, 1999 have been removed.

Reason not incorporated:

Conditions D.12.1 and D.13.1 contain the requirements of 326 IAC 8-2-8 for ovens 301-308 and 309-316, 317-322, 323-328, 329-334 and 335-340. During the Title V renewal process, the permittee submitted information claiming that these ovens never used the coatings ascribed to them in the PTE calculations in Appendix A of T157-6960-00032. The coatings that have been used in these ovens result in a PTE of less than 15 pounds of VOC per day, after the effect of the thermal oxidizers. Therefore, the requirements of 326 IAC 8-2-8 do not apply to these ovens.

- (e) Conditions D.2.1, D.3.1(b), D.5.1, D.6.1, D.7.1, D.9.1, D.10.1, D.14.1, D.15.1, D.16.1, and the associated Compliance Determination Requirements and Record Keeping Requirements of T157-6960-00032, issued February 18, 1999 have been removed.

Reason not incorporated:

The requirements of 326 IAC 8-2-8 do not apply to the ovens. These Conditions require that the Permittee inform IDEM before making any changes that would increase VOC emissions such that the requirements of 326 IAC 8-2-8 would become applicable. These conditions duplicate the requirements in the B Section of the current permit, and are unnecessary.

### **Air Pollution Control Justification as an Integral Part of the Process**

The following justification has been incorporated from the previous Technical Support Document for the initial Part 70 permit:

The company submitted the following justification such that the thermal oxidizers be considered as an integral part of the wire magnet wire coating process:

Wire passes through the enamel applicator where the wire is coated with a base coat and top coat. The coated wire then passes to a curing (drying) oven equipped with a thermal oxidizer. The thermal oxidizer provides the heat necessary for rapid curing of the coating applied to the magnet wire. The heat requirement of the magnet wire curing oven is, in part, satisfied by heat generated from the combustion of the VOC in the thermal oxidizers. The integral internal thermal oxidizers are integral to the magnet wire coating process because:

- (a) The processes could not operate without the oxidizers, because the oxidizers supply the heat needed for curing the wire coating.
- (b) The oxidizers serve a primary purpose other than pollution control. The oxidizers supply the heat needed for curing the wire coating.

IDEM, OAQ has evaluated the justifications and agreed that the thermal and catalytic oxidation systems on these ovens will be considered as an integral part of the wire coating process. However, the control efficiency of the thermal and catalytic oxidizers is dependent on the oven temperature and on the quality of the catalyst for the catalytic oxidizers. Therefore, the permitting level will be determined using the potential to emit before controls. Operating conditions in the proposed permit will specify that the thermal and catalytic oxidizer shall operate at all times when the wire coating process is in operation.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit renewal be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on May 19, 2003. Additional information was received on August 28, 2006.

### Emission Calculations

See Appendix A of this document for detailed emission calculations (page 1).

### Potential to Emit of the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

The source was issued a Part 70 Operating Permit on February 18, 1999. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs*
All wire coating ovens	Less than 100	Less than 100	Less than 100	Less than 250	Less than 100	Less than 100	Single HAP: Less than 9.5 Combination HAP: Less than 24.0
Boilers	0.1	0.3	0.03	0.2	3.6	4.3	0.08
Total PTE	Less than 100	Less than 100	Less than 100	Less than 250	Less than 100	Less than 100	Single HAP: Less than 10 Combination HAP: Less than 25

Note: the PTE listed in this table was taken from the source's original Title V permit (T157-6960-00032, issued February 18, 1999). Also note that the emissions from the insignificant activities are not presented as they have not been determined.

\* In this permit, the source has taken enforceable limits on emissions of HAP such that emissions of HAPs from the entire source would be less than ten (10) tons per year of any single HAP and less than twenty-five (25) tons per year of any combination of HAPs.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of volatile organic compounds is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) **Fugitive Emissions**  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data, which is the most recent year for which data is available:

Pollutant	Actual Emissions (tons/year)
PM	--
PM-10	1
SO <sub>2</sub>	0
VOC	171
CO	11
NO <sub>x</sub>	13
HAP	--

"--" Emissions data not reported.

**County Attainment Status**

The source is located in Tippecanoe County.

Pollutant	Status
PM-10	Attainment
PM2.5	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-hour Ozone <sup>1</sup>	Attainment
CO	Attainment
Lead	Attainment

<sup>1</sup> On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Tippecanoe County has been designated as attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Tippecanoe County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Tippecanoe County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Federal Rule Applicability

- (a) This source is subject to the provisions of 40 CFR Part 64, Compliance Assurance Monitoring (CAM). In order for this rule to apply, a pollutant-specific-emissions-unit at a source that requires a Part 70 or Part 71 permit must meet three criteria for a given pollutant: 1) the unit is subject to an applicable emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and 3) the unit has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source. The following facilities have the potential to emit greater than 100 tons of a specific pollutant, and use a control device to comply with an emission limitation for that specific pollutant:

401-404, 429-432, 433-436, 437-440, 441-443, 417-418, 421-424, 425-428, 445-447, 448-450, 461-463, 464-466, 467/468/469/470, 475/476/477/478, 479, 480, 595-596, 597-598, 599-600, 701-702, 703-704, 705-706, 707-708, 709-710, 711-712, 713-714, 715-716, 725-726, 727-728, 729-730, 731-732, 733-734, 735-736, 737-738, 739-740, 601-612, 613-624, 669-680, 625-632U, 625-632L, 633-644U, 633-644L, 645-656U, 645-656L, 657-668, 301-308, 309-316, 317-322, 323-328, 329-334, 335-340, 801-808, 809-816, 817-824, 825-832, 741, 742, 743, 744, 745, 746, 747, 748, 753, 754, 833, 834, 835, 836, 837, 838, 839 and 840.

These facilities have potential pre-control (but not post-control) VOC emissions that are equal to or greater than 100 percent of the amount required for a source to be classified as a major source, are subject to emission limitations or standards for VOC, and require the use of thermal and/or catalytic oxidizers to achieve compliance with the respective limitations or standards. Therefore, these facilities are classified as "other" units with respect to CAM and are subject to the requirements of 40 CFR Part 64. Pursuant to 40 CFR 64.5(b), the Permittee is required to submit the necessary information required by 40 CFR 64.4 as part of the Part 70 renewal application. The Permittee has satisfied this requirement and monitoring of the pollutant-specific-emission-units will be conducted pursuant to 40 CFR Part 64.

The CAM plan for each of the wire coating ovens listed above consists of:

- (1) Operate the internal thermal oxidizers and the add-on thermal incinerators at all times that the ovens are in operation.
  - (2) Maintain the temperature of the ovens at or above the minimum temperature specified in the permit or the most recent stack tests.
  - (3) Automatically monitor oven temperature and maintain an electronic archive of all temperature readings.
  - (4) Investigate the cause of abnormal readings and make repairs as necessary.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.

The requirements of 40 CFR Part 60, Subpart TT (New Source Performance Standards: Surface Coating of Metal Coil) are not included in this permit for the magnet wire emission units because, pursuant to 40 CFR 60.461, metal coil is defined as "a continuous metal strip" (with a thickness) and the magnet wire coated at this source is not a strip, but a cylindrical piece (with a diameter).

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart Mmmm) are not included in this permit for the magnet wire coating operations at this source because the source has accepted federally enforceable limits on the amount of hazardous air pollutants (HAPs) emitted such that the amount of any single HAP emitted is limited to less than ten (10) tons per year and the amount of any combination of HAPs is limited to less than twenty-five (25) tons per year and they are taking the HAP limit prior to the January 2, 2007 compliance date for existing sources subject to 40 CFR 63, Subpart Mmmm.

The following limit has been included in the permit:

In order to limit the source-wide emissions of a single HAP to less than ten (10) tons per year, and a combination of HAPs to less than twenty-five (25) tons per year, the Permittee shall limit the usage of HAP in the magnet wire ovens as follows:

- (1) The total usage of coatings, solvents, lubricants and cleanup solvents in all of the magnet wire ovens at this source shall be limited such that the potential to emit of a single HAP shall be limited to less than nine and five-tenths (9.5) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit, in conjunction with the potential to emit of a single HAP from insignificant activities at the source shall limit the source-wide emissions of any single HAP to less than ten (10) tons per year.
  - (2) The total usage of coatings, solvents, lubricants and cleanup solvents in all of the magnet wire ovens at this source shall be limited such that the potential to emit of a combination of HAPs shall be limited to less than twenty-four (24.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit, in conjunction with the potential to emit of a combination of HAPs from insignificant activities at the source shall limit the source-wide emissions of any combination of HAPs to less than twenty-five (25) tons per year.
- (d) The requirements of National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil 40 CFR Part 63, Subpart SSSS are not included in this permit for the magnet wire emission units because, pursuant to 40 CFR 63.5110, metal coil is defined as "a continuous metal strip" (with a thickness) and the magnet wire coated at this source is not a strip, but a cylindrical piece (with a diameter).
- (e) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels, (326 IAC 12, 40 CFR 60, Subpart K, 40 CFR 60, Subpart Ka) are not included in this permit for the ten (10) insignificant enamel, lubricant and solvent storage tanks because these tanks have a capacity less than 40,000 gallons.
- (f) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (326 IAC 12, 40 CFR 60, Subpart Kb) are not included in this permit for the ten (10) insignificant enamel, lubricant and solvent storage tanks because these tanks have a capacity less than 75 cubic meters.
- (g) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units (326 IAC 12, 40 CFR 60, Subpart Dc), are not included in this permit for the five (5) natural gas-fired boilers. These boilers have a maximum design heat input capacity less than 10 MMBtu/hr.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63,

Subpart DDDDD) are not included in this permit for the two (2) 5 MMBtu/hr boilers because the source has accepted federally enforceable limits on the amount of hazardous air pollutants (HAPs) emitted such that the amount of any single HAP emitted is limited to less than ten (10) tons per year and the amount of any combination of HAPs is limited to less than twenty-five (25) tons per year and they are taking the HAP limit prior to the September 13, 2007 compliance date (See the limit in paragraph (c) above).

### **State Rule Applicability – Entire Source**

#### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

This source does not belong to one of the 28 PSD source categories. Pursuant to T157-6960-00032, issued February 18, 1999, this source was/is a minor PSD source because the source-wide potential to emit for each criteria pollutant is less than 250 tons per year.

Throughout the initial Part 70 permit (T157-6960-00032, issued February 18, 1999), a number of conditions required the oxidizers and incinerators to operate at minimum overall efficiencies in order to render the requirements of 326 IAC 2-2 not applicable. These conditions were established to address the addition of numerous magnet wire units from 1982 to 1997. However, since those conditions were included in the respective Compliance Determination subsections of the permit D sections, this Part 70 renewal has modified the structure and placement of the conditions to be consistent with Part 70 permit requirements and clarify the nature of the limit. The conditions now read as follows:

Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer and thermal incinerator for magnet wire enameling ovens 401-404, 429-432, 433-436, 437-440 and 441-444, shall, in aggregate, achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.

Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for magnet wire enameling ovens 625-632U, 625-632L, 633-644U, 633-644L, 645-656U and 645-656L shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.

Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for magnet wire enameling oven 657-668 shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.

Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for magnet wire enameling ovens 701-702, 703-704, 705-706, 707-708, 709-710, 711-712, 713-714, 715-716, 595-596, 597-598 and 599-600 shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.

Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for magnet wire enameling ovens 301-308 and 309-316 shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.

Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for magnet wire enameling ovens 601-612, 613-624 and 669-680 shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 not applicable.

Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for magnet wire enameling ovens 741, 742, 743, 744, 745, 746, 747 and 748 shall achieve

an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.

Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for magnet wire enameling ovens 467/468/469/470, 475/476/477/478, 479, 480, 445-447, 448-450, 461-463 and 464-466 shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 not applicable.

Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for magnet wire enameling ovens 725-726, 727-728, 729-730, 731-732, 733-734, 735-736, 737-738 and 739-740 shall achieve an overall efficiency of at least ninety-seven and five tenths percent (97.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.

Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for magnet wire enameling ovens 317-322, 323-328, 329-334 and 335-340 shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.

Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for magnet wire enameling ovens 801-808, 809-816, 817-824 and 825-832 shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.

Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for magnet wire enameling ovens 833, 834, 835, 836, 837, 838, 839 and 840 shall achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.

Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizer for magnet wire enameling ovens 753 and 754 shall achieve an overall efficiency of at least ninety-nine percent (99.0%). Compliance with this limit shall render the requirements of 326 IAC 2-2 and 326 IAC 8-2-8 not applicable.

#### 326 IAC 2-3 (Emission Offset)

This source is not subject to the requirements of 326 IAC 2-3 because it is located in Tippecanoe County which is designated as an attainment area for all criteria pollutants.

#### 326 IAC 2-4.1-1 (New Source Toxics Control)

This source is limiting the emissions of single and combined HAPs to less than ten (10) and less than twenty-five (25) tons per year, respectively. Therefore the requirements of 326 IAC 2-4.1-1 do not apply.

#### 326 IAC 2-6 Emission Reporting

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2005 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

**326 IAC 5-1 (Opacity Limitations)**

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

**326 IAC 6-4 (Fugitive Dust)**

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 6-5 (Fugitive Particulate Matter Emission Limitations)**

This source is not located in a county listed in 326 IAC 6-5-1(a) and has not added a facility with the potential to emit fugitive particulate matter that requires a permit as set forth in 326 IAC 2, after December 13, 1985. Therefore, pursuant to 326 IAC 6-5-1, this source is not subject to the requirements of 326 IAC 6-5.

**326 IAC 8-6 (Organic Solvent Emission Limitations)**

This source is not located in Lake or Marion Counties. The facilities at this source are limited by the requirements of 326 IAC 8-2-8. Therefore, the requirements of 326 IAC 8-6 do not apply to this source.

**326 IAC 9 (Carbon Monoxide Emission Limits)**

Pursuant to 326 IAC 9 (Carbon Monoxide Emission Limits), the source is subject to this rule because it is a stationary source which emits CO emissions and commenced operation after March 21, 1972. However, under this rule, there are no specific CO emission limitations because the source is not an operation listed under 326 IAC 9-1-2.

**326 IAC 10-4 (Nitrogen Oxides Budget Trading Program)**

This source is not subject to 326 IAC 10-4 because the source does not contain a large affected unit or electricity generating unit as defined in 326 IAC 10-4-1.

**State Rule Applicability - Wire Enameling Ovens: 417-418, 421-424 and 425-428**

**326 IAC 8-2 (Surface Coating Emissions Limitations)**

These ovens are located in Tippecanoe County and were constructed prior to January 1, 1980. Therefore, the requirements of 326 IAC 8-2 do not apply to these facilities.

**State Rule Applicability - Wire Enameling Ovens: 401-404, 429-432, 433-436, 437-440, 441-444, 625-632U, 625-632L, 633-644U, 633-644L, 645-656U, 645-656L and 657-668**

**326 IAC 8-2 (Surface Coating Emissions Limitations)**

These wire enameling ovens are magnet wire coating facilities that were constructed after January 1, 1980 and before July 1, 1990. Potential emissions from these facilities are less than 25 tons per year. Therefore, pursuant to 326 IAC 8-2-1, the requirements of 326 IAC 8-2-8 do not apply to these facilities. Any change or modification which may increase the potential emissions to 25 tons per year or more of volatile organic compounds must be approved by IDEM, Office of Air Quality before any such change may occur.

Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizers on these units must maintain a minimum overall control efficiency to render the requirements of 326 IAC 8-

2-8 (and 326 IAC 2-2) not applicable. See the *State Rule Applicability – Entire Source – 326 IAC 2-2* section of this document for the specific requirements.

Stack tests conducted April 2003, December 16, 1999 and April 12, 2000 show that these ovens are in compliance with the emissions limits.

**326 IAC 8-1-6 (New Facilities: General Reduction Requirements)**

These wire enameling ovens were constructed after January 1, 1980 and are located in Tippecanoe County. However, if the potential VOC emissions are less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply to these facilities.

**State Rule Applicability – Wire Enameling Ovens: 301-308, 309-316, 317-322, 323-328, 329-334, 335-340, 445-447, 448-450, 461-463, 464-466, 467/468/469/470, 475/476/477/478, 479, 480, 601-612, 613-624, 669-680 595-596, 597-598, 599-600, 701-702, 703-704, 705-706, 707-708, 709-710, 711-712, 713-714, 715-716, 725-726, 727- 728, 729-730, 731-732, 733-734, 735-736, 737-738, 739-740, 741, 742, 743, 744, 745, 746, 747, 748, 753, 754, 801-808, 809-816, 817-824, 825-832, 833, 834, 835, 836, 837, 838, 839, and 840**

**326 IAC 8-2 (Surface Coating Emissions Limitations)**

These wire enameling ovens are magnet wire coating facilities that were constructed after July 1, 1990. These magnet wire coating facilities utilize thermal oxidizers to control VOC emissions. The actual emissions of VOC from these facilities are less than 15 pounds per day. Therefore, pursuant to 326 IAC 8-1-1(a), the requirements of 326 IAC 8-2-8 do not apply to these facilities. Any change or modification which may increase the actual emissions to 15 pounds per day or more of volatile organic compounds must be approved by IDEM, Office of Air Quality before any such change may occur.

Pursuant to T157-6960-00032, issued February 18, 1999, the internal thermal oxidizers on these units must maintain a minimum overall control efficiency to render the requirements of 326 IAC 8-2-8 (and 326 IAC 2-2) not applicable. See the *State Rule Applicability – Entire Source – 326 IAC 2-2* section of this document for the specific requirements.

Stack tests conducted June 9, 2000, December 2003, June 8, 2000, December 7, 2000, April 17, 2002, August 9, 2001, December 2001, August 28, 2002, December 2002, and August 2003 show that these ovens are in compliance with the emissions limits.

**326 IAC 8-1-6 (New Facilities: General Reduction Requirements)**

These wire enameling ovens were constructed after January 1, 1980 and are located in Tippecanoe County. However, these ovens are regulated under 326 IAC 8-2-8. Therefore, the requirements of 326 IAC 8-1-6 do not apply to these facilities.

**State Rule Applicability – All Wire Enameling Ovens**

**326 IAC 6-3-2 (Process Operations)**

All of the wire enameling ovens at this source are surface coating facilities. The surface coating material is applied to the wire with 100 % transfer efficiency. Therefore, no particulate matter is emitted from the process. Therefore, the requirements of 326 IAC 6-3-2 do not apply to these facilities.

**Source Specific Condition**

Pursuant to SPM 157-11787-00032, issued February 20, 2001:

- (a) The Permittee shall utilize enamel pumping systems that satisfy the following criteria:
  - (1) The return enamel line from the applicators must be direct piped and not running through or under a lid or cover.

- (2) The portables must be filled with an autofeed from a central system or an auto drum pump and piped in solid, not by gravity, through a lid or opening.

### State Rule Applicability – Specifically Regulated Insignificant Activities

#### 326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)

The two (2) 5.0 MMBtu/hr natural gas-fired boilers are sources of indirect heating and were constructed after September 21, 1983. Therefore, they are subject to the requirements of 326 IAC 6-2-4.

Pursuant to 326 IAC 6-2-4, the particulate emissions from the boilers shall be limited by the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input

Q = Total source maximum operating capacity in million Btu/hr (MMBtu/hr) heat input.

For the boiler constructed in 1996,  $Pt = 1.09 / 5^{0.26} = 0.717$  lb MMBtu

For the boiler constructed in 1997,  $Pt = 1.09 / (5 + 5)^{0.26} = 0.599$  lb MMBtu

However, pursuant to 326 IAC 6-2-4, for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu. Therefore, the particulate emissions from the boiler constructed in 1996 shall not exceed 0.6 pounds per MMBtu of heat input.

#### 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) The insignificant welding equipment consumes less than six hundred twenty-five pounds of rod or wire per day. The insignificant torch cutting cuts less than three thousand four hundred inches per hour of stock one (1) inch thickness. Pursuant to 326 IAC 6-3-1(b)(9) and (10), these facilities are exempt from the requirements of 326 IAC 6-3.
- (b) The insignificant structural steel fabrication activities are activities related to routine fabrication, maintenance and repair of structures and equipment and do not constitute a commercial production process. This activity consumes less than six hundred twenty-five pounds of rod or wire per day and cuts less than three thousand four hundred inches per hour of stock one (1) inch thickness. Pursuant to 326 IAC 6-3-1(b)(9) and (10), these facilities are exempt from the requirements of 326 IAC 6-3.

### Testing Requirements

The wire enameling ovens at this source utilize VOC and HAP control devices to achieve compliance with applicable state rules and/or to meet the HAP minor limits. The following testing is required:

- (a) Prior to April 1, 2008, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.2.1 for the internal thermal oxidizer and thermal incinerator. The test shall be performed on one of the following ovens: 401-404, 429-432, 433-436, 437-440 or 441-444. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with 326 IAC 3-6-3 and Section C - Performance Testing and utilizing methods approved by the Commissioner.
- (b) Prior to December 16, 2009, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.2.1 for the internal thermal oxidizer and

thermal incinerator. The test shall be performed on one of the following ovens: 625-632U, 625-632L, 633-644U, 633-644L, 645-656U or 645-656L. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with 326 IAC 3-6-3 and Section C - Performance Testing and utilizing methods approved by the Commissioner.

- (c) Prior to April 12, 2010, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.2.1 for the internal thermal oxidizer and thermal incinerator. The test shall be performed on emissions unit 657-668. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with 326 IAC 3-6-3 and Section C - Performance Testing and utilizing methods approved by the Commissioner.
- (d) Prior to June 8, 2010, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer. The test shall be performed on one of the following ovens: 701-702, 703-704, 705-706, 707-708, 709-710, 711-712, 713-714, or 715-716. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with 326 IAC 3-6-3 and Section C - Performance Testing and utilizing methods approved by the Commissioner.
- (e) Within twelve (12) months of issuance of this permit, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer. The test shall be performed on one of the following ovens: 741, 742, 743, 744, 745, 746, 747 or 748. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with 326 IAC 3-6-3 and Section C - Performance Testing and utilizing methods approved by the Commissioner.
- (f) Prior to December 7, 2010, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer. The test shall be performed on one of the following ovens: 595-596, 597-598, 599-600, 725-726, 727-728, 729-730, 731-732, 733-734, 735-736, 737-738 or 739-740. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with 326 IAC 3-6-3 and Section C - Performance Testing and utilizing methods approved by the Commissioner.
- (g) Within twelve (12) months of issuance of this permit, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer. The test shall be performed on one of the following ovens: 801-808, 809-816, 817-824 or 825-832. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with 326 IAC 3-6-3 and Section C - Performance Testing and utilizing methods approved by the Commissioner.
- (h) Prior to April 24, 2011, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer. The test shall be performed on one of the following ovens: 833, 834, 835, 836, 837, 838, 839 or 840. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with 326 IAC 3-6-3 and Section C - Performance Testing and utilizing methods approved by the Commissioner.
- (i) Prior to April 25, 2011, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer. The test

shall be performed on one of the following ovens: 753 or 754. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with 326 IAC 3-6-3 and Section C - Performance Testing and utilizing methods approved by the Commissioner.

- (j) Within twelve (12) months of issuance of this permit, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer. The test shall be performed on one of the following ovens: 301-308 or 309-316. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with 326 IAC 3-6-3 and Section C - Performance Testing and utilizing methods approved by the Commissioner.
- (k) Prior to August 1, 2008, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer. The test shall be performed on one of the following ovens: 601-612, 613-624 or 669-680. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with 326 IAC 3-6-3 and Section C - Performance Testing and utilizing methods approved by the Commissioner.
- (l) Prior to August 28, 2007, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer. The test shall be performed on one of the following ovens: 467/468/469/470, 475/476/477/478, 479, 480, 445-447, 448-450, 461-463 or 464-466. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with 326 IAC 3-6-3 and Section C - Performance Testing and utilizing methods approved by the Commissioner.
- (m) Prior to December 1, 2007, the Permittee shall conduct a performance test to verify the VOC control efficiency required per Condition D.3.1 for the internal thermal oxidizer. The test shall be performed on one of the following ovens: 317-322, 323-328, 329-334 or 335-340. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with 326 IAC 3-6-3 and Section C - Performance Testing and utilizing methods approved by the Commissioner.

For all of the above ovens requiring performance tests, the oven that is a part of the oven group being tested shall be the oven in which the longest amount of time has elapsed since its previous test.

The following HAP testing requirements have been included in the permit in order to demonstrate compliance with the source-wide minor HAP limit:

- (a) Within twelve (12) months of issuance of this permit, the Permittee shall perform HAP testing of the internal catalytic oxidizer and the external thermal incinerator combined, utilizing methods as approved by the Commissioner, for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration. Stack testing shall be performed in accordance with 326 IAC 3-6.
- (b) One representative thermal oxidizer from the three oxidizers controlling the three (3) MOCO magnet wire ovens listed in Section D.1 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) Within twelve (12) months of issuance of this permit, the Permittee shall perform HAP testing of the internal thermal oxidizer (or for ovens equipped with a thermal incinerator, the internal thermal oxidizer and the external thermal incinerator combined) for the ovens listed in Section D.2 utilizing methods as approved by the Commissioner, for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM. The test shall be performed on one (1) oven in each group of similar ovens. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration. Stack testing shall be performed in accordance with 326 IAC 3-6.
- (d) Within twelve (12) months of issuance of this permit, the Permittee shall perform HAP testing of the internal thermal oxidizer (or for ovens equipped with a thermal incinerator, the internal thermal oxidizer and the external thermal incinerator combined) for the ovens listed in Section D.3 utilizing methods as approved by the Commissioner, for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM. The test shall be performed on one (1) oven in each group of similar ovens. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration. Stack testing shall be performed in accordance with 326 IAC 3-6.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The compliance monitoring requirements applicable to this source are as follows:

The Wire coating ovens 301-308, 309-316, 317-322, 323-328, 329-334, 335-340, 401-404, 429-432, 433-436, 437-440, 441-444, 445-447, 448-450, 461-463, 464-466, 469/4771/472, 473-474, 479, 480, 595-596, 597-598, 599-600, 601-612, 613-624, 625-632U, 625-632L, 633-644U, 633-644L, 645-656U, 645-656L, 657-668, 669-680, 681-696, 701-702, 703-704, 705-706, 707-708, 709-710, 711-712, 713-714, 715-716, 725-726, 727-728, 729-730, 731-732, 733-734, 735-736, 737-738, 739-740, 741, 742, 743, 744, 745, 746, 747, 748, 753, 754, 801-808, 809-816, 817-824, 825-832, 833, 834, 835, 836, 837, 838, 839, and 840 have applicable compliance monitoring conditions as specified below:

- (a) The internal thermal oxidizers and the external thermal oxidizers shall operate at all times that the wire enameling ovens are in operation.
- (b) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature of the thermal oxidizers. For the purposes of this condition, continuous monitoring shall mean no less often than once per

fifteen (15) minutes. The output from this monitoring system and the three hour average temperatures shall be recorded whenever the thermal oxidizer is in operation.

- (c) If the primary continuous monitoring system is not in operation, the thermal oxidizer temperature will be recorded using some manner of secondary system, such as with back-up electro-mechanical hardware or manually if necessary. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of the thermal oxidizers. Continuous monitoring shall mean no less often than once per fifteen (15) minutes.
- (d) The thermal oxidizers shall operate such that if the three-hour average temperature falls below the 3 hour block average minimum required temperature (setpoint) as determined by the latest stack test, corrective actions shall be taken within 15 minutes to return thermal oxidizer temperature to at least the required minimum temperature setpoint. Corrective action must return thermal oxidizer temperature to or above the minimum temperature setpoint within thirty (30) minutes of the corrective action, or the enamel flow to the oven shall be shut off. Failure to take corrective action or failure to shut off the enamel flow as stated above shall be considered a deviation from this permit.
- (e) Any actions taken must be in accordance with Section C – Response to Excursions or Exceedances and failure to take action consistent with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (f) From the issuance date of this permit until the results from the approved stack tests (required by Conditions D.2.5, D.3.5 and D.4.5) are available, the Permittee shall:
  - (1) Operate the internal thermal oxidizers and thermal incinerators on units 401-404, 429-432, 433-436, 437-440 and 441-444 at or above the minimum hourly average temperature of 1150°F.
  - (2) Operate the internal thermal oxidizers on units 625-632U, 625-632L, 633-644U, 633-644L, 645-656U or 645-656L at or above the minimum hourly average temperature of 1154°F.
  - (3) Operate the internal thermal oxidizers on unit 657-668 at or above the minimum hourly average temperature of 1250°F.
  - (4) Operate the internal thermal oxidizers on units 701-702, 703-704, 705-706, 707-708, 709-710, 711-712, 713-714, 715-716, 595-596, 597-598 and 599-600 at or above the minimum hourly average temperature of 1199°F.
  - (5) Operate the internal thermal oxidizers on units 741, 742, 743, 744, 745, 746, 747 and 748 at or above the minimum hourly average temperature of 922°F.
  - (6) Operate the internal thermal oxidizers on units 725-726, 727-728, 729-730, 731-732, 733-734, 735-736, 737-738 and 739-740 at or above the minimum hourly average temperature of 1050°F.
  - (7) Operate the internal thermal oxidizers on units 801-808, 809-816, 817-824 and 825-832 at or above the minimum hourly average temperature of 1025°F.
  - (8) Operate the internal thermal oxidizers on units 833, 834, 835, 836, 837, 838, 839 and 840 at or above the minimum hourly average temperature of 966°F.
  - (9) Operate the internal thermal oxidizers on units 753 and 754 at or above the minimum hourly average temperature of 1100°F.

- (10) Operate the internal thermal oxidizers on units 301-308 and 309-316 at or above the minimum hourly average temperature of 1190°F.
  - (11) Operate the internal thermal oxidizers on units 601-612, 613-624 and 669-680 at or above the minimum hourly average temperature of 1433°F.
  - (12) Operate the internal thermal oxidizers on units 467/468/469/470, 475/476/477/478, 479, 480, 445-447, 448-450, 461-463 and 464-466 at or above the minimum hourly average temperature of 1375°F.
  - (13) Operate the internal thermal oxidizers on units 317-322, 323-328, 329-334 and 335-340 at or above the minimum hourly average temperature of 1250°F.
- (g) Once the results from the approved stack tests are available, the Permittee shall determine the 3-hour block average minimum temperatures that demonstrate compliance with the limits in Sections D.1, D.2, and D.3 of the permit, as approved by IDEM. The Permittee shall then operate the internal thermal oxidizers and thermal incinerators at or above the minimum temperatures determined from the most recent compliant stack test following approval of those temperatures.

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-7 (Part 70), 326 IAC 8 (Volatile Organic Compounds), 326 IAC 8-2-8 (Magnet Wire Coating Operations) and 326 IAC 2-2 (Prevention of Significant Deterioration). These monitoring conditions are also necessary to ensure that the source-wide HAP emissions are less than ten (10) tons and less than twenty-five (25) tons for a single HAP and any combination of HAPs, respectively, rendering the requirements of 40 CFR 63, Subpart M, not applicable.

## Conclusion

The operation of this stationary magnet wire coating operation shall be subject to the conditions of this Part 70 permit renewal no. 157-17638-00032.

**Appendix A: Emission Calculations**  
**326 IAC 8-2-8: Rule Applicability Calculations: Magnet Wire Coating Operations**

Company Name: **Rea Magnet Wire Company**  
 Address: **2800 Concord Road, Lafayette, Indiana 47909**  
 Title V: **T157-17638-00032**  
 Reviewer: **ERG/ST**  
 Date: **September 28, 2006**

Oven Model	Oven ID Number	# Ovens	Material	Density (lbs/gal)	Weight Percent VOC (%)	Usage (gal/unit)	Maximum Throughput (unit/hour)	Type of Thermal Oxidizer	Potential to Emit						
									Before internal Thermal		Oxidizer Destruction Efficiency (%)	After Thermal Oxidizer			
									PTE VOC per oven (lbs/hr)	PTE VOC per oven (lbs/day)		PTE VOC per oven (lbs/hr)	PTE VOC per oven (lbs/day)	PTE VOC per oven (tons/yr)	PTE VOC all ovens (tons/yr)
MOCO	417-418, 421-424, 425-428	3	Formvar 11313G-24	8.50	74.00%	0.14602	54.00	add-on+internal	49.6	1190	98.50%	0.74	17.8	3.26	9.8
GEM	401-404, 429-432, 433-436, 437-440	4	Worst Case Coating	8.58	76.00%	0.12344	67.20	internal+add-on	NA *	NA *	98.50%	0.81	19.47	3.55	14.2
GEI	441-444	1	Worst Case Coating	8.58	76.00%	0.10111	40.32	internal+add-on	NA *	NA *	98.50%	0.40	9.57	1.75	1.75
NEM-8	625-632U, 625-632L	2	Base Coat	8.70	64.00%	0.02690	48.24	internal	NA *	NA *	98.50%	0.11	2.60	0.47	0.95
			Top Coat Nylon	8.33	84.90%	0.01350	48.24	internal	NA *	NA *	98.50%	0.07	1.66	0.30	0.61
			Total									0.18	4.26	0.78	1.55
NEM-12	633-644U, 633-644L, 645-656U, 645-656L	4	Base Coat	8.70	64.00%	0.02690	72.36	internal	NA *	NA *	98.50%	0.16	3.90	0.71	2.85
			Top Coat Nylon	8.33	86.00%	0.01350	72.36	internal	NA *	NA *	98.50%	0.10	2.52	0.46	1.84
			Total									0.27	6.42	1.17	2.34
NEL	657-658	1	Base Coat	8.65	72.00%	0.00884	370.80	internal	NA *	NA *	98.50%	0.31	7.35	1.34	1.34
			Top Coat Nylon	8.33	87.00%	0.00174	370.80	internal	NA *	NA *	98.50%	0.07	1.68	0.31	0.31
			Total									0.38	9.03	1.65	1.65
SEL	701-702, 703-704, 705-706, 707-708, 709-710, 711-712, 713-714, 715-716	8	Base Coat	8.65	72.00%	0.01231	81.60	internal	NA *	NA *	98.50%	0.09	2.25	0.41	3.29
			Top Coat Nylon	8.33	87.00%	0.00240	81.60	internal	NA *	NA *	98.50%	0.02	0.51	0.09	0.75
			Total									0.12	2.76	0.50	4.03
SEL	595-596, 597-598, 599-600	3	Base Coat Ester	9.27	64.00%	0.02379	19.56	internal	NA *	NA *	98.50%	0.04	0.99	0.18	0.54
			Top Coat Al	8.90	70.00%	0.00734	19.56	internal	NA *	NA *	98.50%	0.01	0.32	0.06	0.18
			Total									0.05	1.32	0.24	0.72
SEL	725-726, 727-728, 729-730, 731-732	4	Base Coat Ester	9.27	64.00%	0.00781	55.80	internal	NA *	NA *	98.50%	0.04	0.93	0.17	0.68
			Top Coat Al	8.90	70.00%	0.00245	55.80	internal	NA *	NA *	98.50%	0.01	0.31	0.06	0.22
			Total									0.05	1.24	0.23	0.90
SEL	733-734, 735-736, 737-738, 739-740	4	Base Coat Ester	9.27	64.00%	0.00781	55.80	internal	NA *	NA *	98.50%	0.04	0.93	0.17	0.68
			Top Coat Al	8.90	70.00%	0.00245	55.80	internal	NA *	NA *	98.50%	0.01	0.31	0.06	0.22
			Total									0.05	1.24	0.23	0.90
NEVG	301-308, 309-316	2	Base Coat Ester	9.27	64.00%	0.03381	84.96	internal	NA *	NA *	98.50%	0.26	6.14	1.12	2.24
			Top Coat Al	8.90	70.00%	0.01034	84.96	internal	NA *	NA *	98.50%	0.08	1.97	0.36	0.72
			Total									0.34	8.11	1.48	2.96
NEMG	601-612, 613-624, 669-680	3	Base Coat Ester	9.27	64.00%	0.01250	195.12	internal	NA *	NA *	98.50%	0.22	5.21	0.95	1.90
			Top Coat Al	8.90	70.00%	0.00388	195.12	internal	NA *	NA *	98.50%	0.07	1.70	0.31	0.62
			Total									0.29	6.91	1.26	2.52
MAG HES-2	741, 742, 743, 744, 745, 746, 747, 748	8	Base Coat	8.65	72.00%	0.00547	93.00	internal	NA *	NA *	98.50%	0.05	1.14	0.21	1.67
			Top Coat Nylon	8.33	87.00%	0.00106	93.00	internal	NA *	NA *	98.50%	0.01	0.26	0.05	0.38
			Total									0.06	1.40	0.26	2.04
V-22	467/468/469/470, 475/476/477/478,	4	Worst Case Coating	8.58	76.00%	0.14602	30.60	internal	NA *	NA *	98.50%	0.44	10.49	1.91	7.66
V-22	445-447, 448-450, 461-463, 464-466	4	Worst Case Coating	8.58	76.00%	0.14602	30.60	internal	NA *	NA *	98.50%	0.44	10.49	1.91	7.66
SEV	317-322, 323-328, 329-334, 335-340	4	Base Coat Ester	9.27	64.00%	0.04049	57.96	internal	NA *	NA *	98.50%	0.21	5.01	0.91	3.66
			Top Coat Al	8.90	70.00%	0.01236	57.96	internal	NA *	NA *	98.50%	0.07	1.6	0.29	1.17
			Total									0.28	6.6	1.21	4.83
SEM	801-808, 809-816	2	Worst Case Coating	8.58	76.00%	0.03350	174.24	internal	NA *	NA *	98.50%	0.57	13.70	2.50	5.00
SEM	817-824, 825-832	2	Worst Case Coating	8.58	76.00%	0.03350	174.24	internal	NA *	NA *	98.50%	0.57	13.70	2.50	5.00
MAG HES-5	833, 834, 835, 836, 837, 838, 839, 840	8	Base Coat Ester	9.27	64.00%	0.01709	25.08	internal	NA *	NA *	98.50%	0.04	0.92	0.17	1.34
			Int Coat Al	8.80	65.00%	0.00288	25.08	internal	NA *	NA *	98.50%	0.01	0.15	0.03	0.22
			Bond Coat	8.92	82.00%	0.01565	25.08	internal	NA *	NA *	98.50%	0.04	1.03	0.19	1.51
			Total									0.09	2.1	0.38	3.06
SML	753, 754	2	Base Coat Ester	9.27	64.00%	0.01970	40.80	internal	NA *	NA *	98.50%	0.07	1.72	0.31	0.63
			Top Coat Al	8.90	70.00%	0.00609	40.80	internal	NA *	NA *	98.50%	0.02	0.6	0.10	0.20
			Total									0.09	2.3	0.41	0.83

80.91

The transfer efficiency for all wire coating operations is 100%. There is no particulate potential due to the magnet wire coating operations.  
 \* These ovens utilize internal thermal oxidizers to control VOC emissions. PTE is calculated after the thermal oxidizers.

**Methodology**

PTE VOC per oven (Before internal Oxidizers) (lbs/hr) = Density (lbs/gal) x Weight Percent VOC (%) x Usage (gal/unit) x Maximum Throughput (units/hr)  
 PTE VOC per oven (After internal Oxidizers) (lbs/hr) = Density (lbs/gal) x Weight Percent VOC (%) x Usage (gal/unit) x Maximum Throughput (units/hr) x (1- Destruction Efficiency(%))  
 PTE VOC per oven (After internal Oxidizers) (tons/yr) = Density (lbs/gal) x Weight Percent VOC (%) x Usage (gal/unit) x Max. Throughput (units/hr) x (1- Destruction Eff. (%) x 8760 (hrs/yr) x 1/2000 (ton/lbs))

**Appendix A: Emissions Calculations  
Combustion Emissions from Natural Gas-fired Boilers**

**Company Name:** Rea Magnet Wire Company  
**Address:** 2800 Concord Road, Lafayette, Indiana 47909  
**Title V:** T157-17638-00032  
**Reviewer:** ERG/ST  
**Date:** September 28, 2006

Total Heat Input Capacity MMBtu/hour 10.00
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Potential Throughput MMscf/year 85.9
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	Pollutant						
Emission Factor (lbs/MMscf)	PM*	PM10*	SO <sub>2</sub>	NOx **	VOC	CO	HAPs
PTE (tons/year)	0.08	0.33	0.026	4.29	0.24	3.61	0.081

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

\*\*Emission factor for NOx (Uncontrolled) = 100 lb/MMscf.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (7/98).

All emission factors are based on normal firing.

**Methodology**

Potential Throughput (MMscf/year) = Heat Input Capacity (MMBtu/hour) x 8,760 hours/year x 1 MMscf/1,020 MMBtu

PTE (tons/year) = Throughput (MMscf/year) x Emission Factor (lbs/MMscf) x 1 ton/2,000 lbs