INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Joseph E. Kernan
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Commissioner

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

April 13, 2004

TO: Interested Parties / Applicant

RE: Cooperfield, LLC / 057-18488-00034

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

Notice of Decision – Approval

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

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot 9/16/03

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April 13, 2004

Mr. Richard Carr
Copperfield, LLC
3400 Union Street
Lafayette, Indiana 47903

Re: 157-18488-00034
Fourth Notice-Only-Change to
Minor Source Operating Permit No. 157-14304-00034

Dear Mr. Carr:

Copperfield, LLC was issued a MSOP on March 20, 2002 for a wire and cable manufacturing plant. A letter notifying the IDEM, OAQ of the removal of some existing operations was received on January 29, 2004. Pursuant to the provisions of 326 IAC 2-6.1-6(d), the MSOP is hereby revised as follows:

1. The source stated that the four (4) Banbury mixers (identified as BB1 through BB4), one with a maximum capacity of 2000 pounds of rubber per hour, and three others each with a maximum capacity of 2500 pounds of rubber per hour, and controlled by two (2) baghouses have been permanently taken out of service. Therefore, four (4) Banbury mixers and the associated baghouses were deleted from the revised MSOP.

2. Condition D.2.1(a) and D.2.1(b) (326 IAC 6-3-2 (Process Operations)) were deleted because the associated emission units no longer exist at the source.

3. The source stated that one (1) Clayton Steam Generator (exhausting to stack CS-S) with a maximum heat input capacity of 2.34 MMBtu per hour, has been removed from the source. Therefore, conditions related to the Clayton Steam Generator were deleted from the permit.

4. Since 326 IAC 6-3 was updated on August 1, 2002, IDEM, OAQ has updated Condition D.2.1 so that the correct title for 326 IAC 6-3, “Process Operations to Particulate Emission Limitations for Manufacturing Processes”, is reflected in the revised MSOP.

5. The rule citation in Record Keeping Requirements was corrected from ‘[326 IAC 2-8-4(3)][326 IAC 2-8-16] to ‘[326 IAC 2-5.1-3(e)(2)][326 IAC 2-6.1-5(a)(2)] to reflect the Minor Source Operating Permit status.

Proposed Changes

The changes are as follows. Language with a line through it has been deleted and bold language has been added. The Table of Contents has been updated.

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) One (1) natural gas-fired boiler, referred to as the Clayton Steam Boiler, with a maximum heat input capacity of 12.88 Btu per hour. This boiler was installed in 1996 and it exhausts to the atmosphere via stack C-S;

(b) One (1) natural gas-fired boiler, referred to as the Clever Brooks boiler, with a maximum heat input capacity of 33.48 million Btu per hour. This boiler was installed in 1994 and it exhausts to the atmosphere via stack CB-S;

~~(c) One (1) natural gas-fired boiler, referred to as the Clayton Steam Generator, with a maximum heat input capacity of 2.34 million Btu per hour. This boiler was installed in 1980 and it exhausts to the atmosphere via stack CS-S;~~

(~~d~~**c**) One (1) natural gas-fired boiler, referred to as the Keeler Faber boiler, with a maximum heat input capacity of 25.75 million Btu per hour. This boiler was installed in 1972 and it exhausts to the atmosphere via stack KF-S;

(~~e~~**d**) Natural gas-fired space heaters with a total heat input capacity of 4.005 million Btu per hour;

~~(f) Four (4) Banbury mixers, one with a maximum capacity of 2,000 pounds of rubber per hour, and three others each with a maximum capacity of 2,500 pounds of rubber per hour, referred to as BB1 through BB4. The particulate matter emissions from these mixers are controlled by two baghouses;~~

(~~g~~**e**) Two (2) Continuous Vulcanization Catenary Lines, referred to as CV-1 and CV-2, each with a maximum capacity of 762 pounds of rubber per hour;

(~~h~~**f**) Two (2) continuous vulcanization - slope lines, referred to as CV-5 and CV-6, each with a maximum capacity of 762 pounds of rubber per hour;

(~~i~~**g**) One (1) rod mill;

(~~j~~**h**) Three (3) wire mills;

(~~k~~**i**) One (1) compactor for crushing empty boxes and bags;

(~~l~~**j**) One (1) bag baler;

(~~m~~**k**) Four (4) parts washers;

(~~n~~**l**) One (1) finished goods warehouse;

(~~o~~**m**) Raw material storage areas;

(~~p~~**n**) Electronic beam facility;

(~~q~~**o**) Off-line packaging;

(~~r~~**p**) Waste accumulation area;

(~~s~~**q**) Pilot plant;

(~~t~~**r**) Wastewater evaporator;

(~~u~~**s**) Ancillary equipment;

(~~v~~**t**) Empty compound tanks; and

(~~w~~**u**) Process oil tanks.

SECTION D.1 EMISSIONS UNITS OPERATION CONDITIONS

Facility Description [326 IAC 2-6]:

(a) One (1) natural gas-fired boiler, referred to as the Clayton Steam Boiler, with a maximum heat input capacity of 12.88 Btu per hour. This boiler was installed in 1996 and it exhausts to the atmosphere via stack C-S;

(b) One (1) natural gas-fired boiler, referred to as the Clever Brooks boiler, with a maximum heat input capacity of 33.48 million Btu per hour. This boiler was installed in 1994 and it exhausts to the atmosphere via stack CB-S;

~~(c) One (1) natural gas-fired boiler, referred to as the Clayton Steam Generator, with a maximum heat input capacity of 2.34 million Btu per hour. This boiler was installed in 1980 and it exhausts to the atmosphere via stack CS-S;~~

(~~d~~**c**) One (1) natural gas-fired boiler, referred to as the Keeler Faber boiler, with a maximum heat input capacity of 25.75 million Btu per hour. This boiler was installed in 1972 and it exhausts to the atmosphere via stack KF-S;

(~~e~~**d**) Natural gas-fired space heaters with a total heat input capacity of 4.005 million Btu per hour;

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

Emission Limitations and Standards

D.1.~~1~~**1** General Provision Relating to NSPS [326 IAC 12-1][40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the ~~facility~~**two (2) boilers (exhausting to stacks identified as CB-S and C-S)** described in this section except when otherwise specified in 40 CFR 60, Subpart Dc.

D.1.~~1~~**2** Particulate ~~Matter (PM)~~ [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from the Keeler Faber Boiler ~~and the Clayton Steam Generator~~ shall ~~each~~ be limited to 0.6 pounds of PM per million British thermal units.

D.1.~~2~~**3** Particulate ~~Matter (PM)~~ [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from the Clever Brooks Boiler **(exhausting to a stack identified as CB-S)** and the Clayton Steam Boiler **(exhausting to a stack identified as C-S)** shall be limited to ~~0.37~~**0.38** and 0.36 pounds of PM per million British thermal units, respectively. The limits were calculated using the equation below:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
Q = Total source maximum operating capacity (MMBtu/hr) = ~~62~~**59.2** MMBtu/hr for the Clever Brooks boiler and ~~74~~**72.1** MMBtu/hr for the Clayton Steam boiler.

D.1.~~3~~**4** Particulate Matter [40 CFR 60, Subpart Dc] [326 IAC 12]

The Clayton Steam Boiler and the Clever Brooks boiler are subject to the New Source Performance Standard (NSPS), 326 IAC 12, 40 CFR Part 60 Subpart Dc. Pursuant to this rule, records shall be kept of the amount of fuel combusted during each month. ~~These records shall be maintained by the owner or operator of the facility for a period of two years following the date of such record.~~

Record Keeping and Reporting Requirement ~~[326 IAC 2-8-4(3)][326 IAC 2-8-16]~~ [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirements

(a) To document compliance with Condition D.1.~~3~~**4**, the Permittee shall maintain monthly fuel records.

~~(b) A certification signed by the owner or operator that the records of the fuel usage represent all of the fuel combusted during the period. The natural gas fired boiler certification does not require the certification of the "responsible official" as defined by 326 IAC 2-7-1(34).~~

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

~~D.1.6 Reporting Requirements~~

~~The Permittee shall submit a signed certification that certifies that only natural gas was combusted in the Clayton Steam Boiler, Clever Brooks Boiler, and the Keeler Faber Boiler during the period. The natural gas boiler certification shall be submitted semi annually to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the six (6) month period being reported.~~

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6]:

~~(f) Four (4) Banbury mixers, one with a maximum capacity of 2,000 pounds of rubber per hour, and three others each with a maximum capacity of 2,500 pounds of rubber per hour, referred to as BB1 through BB4. The particulate matter emissions from these mixers are controlled by two baghouses;~~

(~~g~~**e**) Two (2) Continuous Vulcanization Catenary Lines 1, referred to as CV-1 and CV-2, each with a maximum capacity of 762 pounds of rubber per hour;

(~~h~~**f**) Two (2) continuous vulcanization - slope lines, referred to as CV-5 and CV-6, each with a maximum capacity of 762 pounds of rubber per hour;

(~~i~~**g**) One (1) rod mill;

(~~j~~**h**) Three (3) wire mills;

(~~k~~**i**) One (1) compactor for crushing empty boxes and bags;

(~~l~~**j**) One (1) bag baler;

(~~m~~**k**) Four (4) parts washers;

(~~n~~**l**) One (1) finished goods warehouse;

(~~o~~**m**) Raw material storage areas;

(~~p~~**n**) Electronic beam facility;

(~~q~~**o**) Off-line packaging;

(~~r~~**p**) Waste accumulation area;

(~~s~~**q**) Pilot plant;

(~~t~~**r**) Wastewater evaporator;

(~~u~~**s**) Ancillary equipment;

(~~v~~**t**) Empty compound tanks; and

(~~w~~**u**) Process oil tanks.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3 (**Particulate Emission Limitations for Manufacturing Processes**~~Process Operations~~), the following conditions shall apply:

~~(a) The allowable PM emission rate from the Banbury Mixer BB1 shall not exceed 4.1 pounds per hour when operating at a process weight rate of 2000 pounds per hour.~~

~~(b) The allowable PM emission rate from the Banbury Mixers BB2 through BB4 shall each not exceed 4.8 pounds per hour when operating at a process weight rate of 2500 pounds per hour. The baghouses shall be in operation at all times the Banbury Mixers are in operation, in order to comply with this limit.~~

(**a**~~c~~) The **particulate**~~allowable PM~~ emission**s** ~~rate~~ from the continuous vulcanization lines shall each not exceed 2.1 pounds per hour when operating at a process weight rate of 762 pounds per hour.

(**b**~~d~~) The **particulate**~~allowable PM~~ emission**s** ~~rate~~ from the thermoplastic extrusion lines shall each not exceed 1.8 pounds per hour when operating at a process weight rate of 588 pounds per hour.

. . .

All other conditions of the MSOP shall remain unchanged and in effect. Please find attached a copy of the revised MSOP.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanober Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original Signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/SD

cc: File-Tippecanoe County
Tippecanoe County Health Department
Air Compliance Section Inspector - Wanda Stanfield
Compliance Data Section
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner

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MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

Copperfield, LLC
3400 Union Street
Lafayette, Indiana 47904

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 157-14304-00034	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 20, 2002 Expiration Date: March 20, 2007

First Notice Only Change No.: 157-15438-00034, issued April 24, 2002
Second Notice Only Change No.: 157-16504-00034, issued December 11, 2002
Third Notice Only Change No.: 157-17497-00034, issued April 30, 2003

Fourth Notice Only Change No.:157-18488-00034	Pages Affected: 4, 16 and 17
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 13, 2004

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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 and A.2 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary wire and cable manufacturing facility.

Authorized Individual:	Rich Carr
Source Address:	3400 Union Street, Lafayette, Indiana 47903
Mailing Address:	1115 West Plymouth Street, P.O. Box 360, Bremen, Indiana 46506
General Source Phone:	(574) 546-5115
SIC Code:	2822 and 3357
County Location:	Tippecanoe
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) One (1) natural gas-fired boiler, referred to as the Clayton Steam Boiler, with a maximum heat input capacity of 12.88 million Btu per hour. This boiler was installed in 1996 and it exhausts to the atmosphere via stack C-S;

(b) One (1) natural gas-fired boiler, referred to as the Clever Brooks boiler, with a maximum heat input capacity of 33.48 million Btu per hour. This boiler was installed in 1994 and it exhausts to the atmosphere via stack CB-S;

(c) One (1) natural gas-fired boiler, referred to as the Keeler Faber boiler, with a maximum heat input capacity of 25.75 million Btu per hour. This boiler was installed in 1972 and it exhausts to the atmosphere via stack KF-S;

(d) Natural gas-fired space heaters with a total heat input capacity of 4.005 million Btu per hour;

(e) Two (2) Continuous Vulcanization Catenary Lines, referred to as CV-1 and CV-2, each with a maximum capacity of 762 pounds of rubber per hour;

(f) Two (2) continuous vulcanization - slope lines, referred to as CV-5 and CV-6, each with a maximum capacity of 762 pounds of rubber per hour;

(g) One (1) rod mill;

(h) Three (3) wire mills;

(i) One (1) compactor for crushing empty boxes and bags;

(j) One (1) bag baler;

(k) Four (4) parts washers;

(l) One (1) finished goods warehouse;

(m) Raw material storage areas;

(n) Electronic beam facility;

(o) Off-line packaging;

(p) Waste accumulation area;

(q) Pilot plant;

(r) Wastewater evaporator;

(s) Ancillary equipment;

(t) Empty compound tanks; and

(u) Process oil tanks.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

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 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Modification of Permits [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of operating permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 Permit Term [326 IAC 2-6.1-7]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Minor Source Status and Part 70 Source Status [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-7]

(a) The total source potential to emit of all criteria pollutants is less than 100 tons per year. Therefore the requirements of 326 IAC 2-7 and 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply. The potential to emit a single HAP is less than 10 tons per year and the potential to emit is less than 25 tons per year for a combination of HAPs. Therefore, 326 IAC 2-7 (Part 70) does not apply.

(b) Any change or modification which may increase potential to emit to 100 tons per year from this source for all criteria pollutants except particulate matter (PM), shall cause this source to be considered a major source under 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change. Also, any change or modification which may increase the potential to emit to 250 tons per year of PM shall cause this source to be considered a major source under PSD 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change. Also any change or modification which may increase the potential to emit of a single HAP to greater than ten tons per year and/or a combination of HAPs to be greater than 25 tons per year, shall cause this source to be subject to 326 IAC 2-7 (Part 70). The source shall notify OAQ prior to making the changes.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:

(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;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

(c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

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 permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

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

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 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.8 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).

Testing Requirements

C.9 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3]

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, or other approved methods as specified in this permit.

C.12 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 1-6]

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

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

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

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

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

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

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

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

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

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

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

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

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

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

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

Record Keeping and Reporting Requirements

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM),Office of Air Quality(OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts morethan one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the

equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.15 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a

violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C -Compliance Response Plan - Preparation, Implementation, Records, and Reports, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

(b) 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.

(c) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.17 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

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

SECTION D.1 EMMISIONS UNITS OPERATION CONDITIONS

Facility Description [326 IAC 2-6]:

(a) One (1) natural gas-fired boiler, referred to as the Clayton Steam Boiler, with a maximum heat input capacity of 12.88 million Btu per hour. This boiler was installed in 1996 and it exhausts to the atmosphere via stack C-S;

(b) One (1) natural gas-fired boiler, referred to as the Clever Brooks boiler, with a maximum heat input capacity of 33.48 million Btu per hour. This boiler was installed in 1994 and it exhausts to the atmosphere via stack CB-S;

(c) One (1) natural gas-fired boiler, referred to as the Keeler Faber boiler, with a maximum heat input capacity of 25.75 million Btu per hour. This boiler was installed in 1972 and it exhausts to the atmosphere via stack KF-S;

(d) Natural gas-fired space heaters with a total heat input capacity of 4.005 million Btu per hour;

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

Emission Limitations and Standards

D.1.1 General Provision Relating to NSPS [326 IAC 12-1][40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the two (2) boilers (exhausting to stacks identified as CB-S and C-S) described in this section except when otherwise specified in 40 CFR 60, Subpart Dc.

D.1.2 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from the Keeler Faber Boiler shall be limited to 0.6 pounds of PM per million British thermal units.

D.1.3 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from the Clever Brooks Boiler (exhausting to a stack identified as CB-S) and the Clayton Steam Boiler (exhausting to a stack identified as C-S) shall be limited to 0.38 and 0.36 pounds of PM per million British thermal units, respectively. The limits were calculated using the equation below:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
Q = Total source maximum operating capacity (MMBtu/hr) = 59.2 MMBtu/hr for the Clever Brooks boiler and 72.1 MMBtu/hr for the Clayton Steam boiler.

D.1.4 Particulate Matter [40 CFR 60, Subpart Dc] [326 IAC 12]

The Clayton Steam Boiler and the Clever Brooks boiler are subject to the New Source Performance Standard (NSPS), 326 IAC 12, 40 CFR Part 60 Subpart Dc. Pursuant to this rule, records shall be kept of the amount of fuel combusted during each month.

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirements

(a) To document compliance with Condition D.1.4, the Permittee shall maintain monthly fuel records.

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6]:

(e) Two (2) Continuous Vulcanization Catenary Lines 1, referred to as CV-1 and CV-2, each with a maximum capacity of 762 pounds of rubber per hour;

(f) Two (2) continuous vulcanization - slope lines, referred to as CV-5 and CV-6, each with a maximum capacity of 762 pounds of rubber per hour;

(g) One (1) rod mill;

(h) Three (3) wire mills;

(i) One (1) compactor for crushing empty boxes and bags;

(j) One (1) bag baler;

(k) Four (4) parts washers;

(l) One (1) finished goods warehouse;

(m) Raw material storage areas;

(n) Electronic beam facility;

(o) Off-line packaging;

(p) Waste accumulation area;

(q) Pilot plant;

(r) Wastewater evaporator;

(s) Ancillary equipment;

(t) Empty compound tanks; and

(u) Process oil tanks.

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

Emission Limitations and Standards

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the following conditions shall apply:

(a) The particulate emissions from the continuous vulcanization lines shall each not exceed 2.1 pounds per hour when operating at a process weight rate of 762 pounds per hour.

(d) The particulate emissions from the thermoplastic extrusion lines shall each not exceed

1.8 pounds per hour when operating at a process weight rate of 588 pounds per hour.

The pounds per hour limitations were calculated with the following equation:

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

$E = 4.10 P0.67$ where: E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.2 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a emissions unit for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.3 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner oroperator of a cold cleaner degreaser emissions unit shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{o}C$) (one hundred degrees Fahrenheit ($100^{o}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a emissions unit for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{o}C$) (one hundred degrees Fahrenheit ($100^{o}F$)), then the drainage emissions unit must be internal such that articles are enclosed under the cover while draining. The drainage emissions unit may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{o}C) (one hundred degrees Fahrenheit (100^{o}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{o}C) (one hundred twenty degrees Fahrenheit (120^{o}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning emissions unit shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Copperfield LLC
Address:	3400 Union Street
City:	Lafayette, Indiana 47904
Phone #:	574-546-5115
MSOP #:	157-14304-00034

I hereby certify that Copperfield LLC is ☐ still in operation.
☐ no longer in operation.

I hereby certify that Copperfield LLC is ☐ in compliance with the requirements of MSOP 157-14304-00034.
☐ not in compliance with the requirements of MSOP 157-14304-00034.

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

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

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMI LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____
_____

Appendix A: Emission Calculations
Continuous Vulcanization Lines (identified as CV-1, CV-2, CV-5, and CV-6)

Company Name: Copperfield, LLC
Address: 3400 Union Street, Lafayette, Indiana 47904
MSOP: 157-14304
Plt ID: 157-00034
Reviewer: ERG/AR
Date: 7-Sep-01 (updated on March 11, 2004 by ERG/SD)

Emission Factors for Extruding in lb/lb of rubber			
	PM	VOC	HAP
Compound 9 (EPDM)	1.51E-08	1.24E-05	1.89E-05

Emission Factors for Autoclave Curing in lb/lb of rubber			
	PM	VOC	HAP
Compound 9 (EPDM)	-------	2.47E-04	4.70E-04

Emissions Due to InkJet Printing

Product	Max. Usage (gal/year)	Density (lb/gal)	Weight % VOC	PTE of VOC (lb/year)	PTE of VOC (tons/year)	Weight % HAP	PTE of HAP (lbs/year)	PTE of HAP (tons/year)
Ink	12	8.01	70	67.3	0.03	5	4.81	0.00
Makeup	6	6.67	100	40.0	0.02	70	28.0	0.01
Wash	21	6.67	100	140	0.07	100	140	0.07
TOTAL					**0.12**			**0.09**

Note:
Total Emissions from the Continuous Vulcanization Lines = Emissions from Extrusion + Emissions from Autoclave Curing + Emissions from Printing
Maximum Capacity of All Lines Combined = 3,048 pounds per hour

Total Emissions from all CV Lines in tons/year			
	PM	VOC	HAP
Continuous Vulcanization Lines	2.02E-04	3.59	6.61

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
One (1) Clayton Steam Bolier (identified as C-S)

Company Name: Copperfield, LLC
Address: 3400 Union Street, Lafayette, Indiana 47904
MSOP: 157-14304
Plt ID: 157-00034
Reviewer: ERG/AR
Date: 7-Sep-01 (updated on March 11, 2004 by ERG/SD)

Heat Input Capacity (MMBtu/hour)	Potential Throughput (MMCF/year)
12.9	113

Pollutant

	* PM	* PM10	SO_2	** NO_x	VOC	CO
Emission Factor (lb/MMCF)	7.60	7.60	0.60	100	5.50	84.0
Potential To Emit (tons/year)	0.43	0.43	0.03	5.64	0.31	4.74

*PM and PM10 emission factors are filterable and condensible PM and PM10 combined.
**Emission factor for NO_x: (Uncontrolled) = 100 lb/MMCF.

METHODOLOGY
All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu
Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
One (1) Clayton Steam Bolier (identified as C-S)

Company Name: Copperfield, LLC
Address: 3400 Union Street, Lafayette, Indiana 47904
MSOP: 157-14304
Plt ID: 157-00034
Reviewer: ERG/AR
Date: 7-Sep-01 (updated on March 11, 2004 by ERG/SD)

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	1.18E-04	6.77E-05	4.23E-03	1.02E-01	1.92E-04

HAPs - Metals

	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	2.82E-05	6.21E-05	7.90E-05	2.14E-05	1.18E-04

Total HAPs = 1.06E-01 (tons/year)

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors as provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998).
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
One (1) Keeler Faber Bolier (identified as KF-S)

Company Name: Copperfield, LLC
Address: 3400 Union Street, Lafayette, Indiana 47904
MSOP: 157-14304
Plt ID: 157-00034
Reviewer: ERG/AR
Date: 7-Sep-01 (updated on March 11, 2004 by ERG/SD)

Heat Input Capacity (MMBtu/hour)	Potential Throughput (MMCF/year)
25.8	226

Pollutant

	* PM	* PM10	SO_2	** NO_x	VOC	CO
Emission Factor (lb/MMCF)	7.60	7.60	0.60	100	5.50	84.0
Potential To Emit (tons/year)	0.86	0.86	0.07	11.3	0.62	9.47

*PM and PM10 emission factors are filterable and condensible PM and PM10 combined.
**Emission factor for NO_x: (Uncontrolled) = 100 lb/MMCF.

METHODOLOGY
All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu
Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
One (1) Keeler Faber Bolier (identified as KF-S)

Company Name: Copperfield, LLC
Address: 3400 Union Street, Lafayette, Indiana 47904
MSOP: 157-14304
Plt ID: 157-00034
Reviewer: ERG/AR
Date: 7-Sep-01 (updated on March 11, 2004 by ERG/SD)

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	2.37E-04	1.35E-04	8.46E-03	2.03E-01	3.83E-04

HAPs - Metals

	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	5.64E-05	1.24E-04	1.58E-04	4.29E-05	2.37E-04

Total HAPs = 2.13E-01 (tons/year)

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors as provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
One (1) Clayton Steam Bolier (identified as CB-S)

Company Name: Copperfield, LLC
Address: 3400 Union Street, Lafayette, Indiana 47904
MSOP: 157-14304
Plt ID: 157-00034
Reviewer: ERG/AR
Date: 7-Sep-01 (updated on March 11, 2004 by ERG/SD)

Heat Input Capacity (MMBtu/hour)	Potential Throughput (MMCF/year)
33.5	293

Pollutant

	* PM	* PM10	SO_2	** NO_x	VOC	CO
Emission Factor (lb/MMCF)	7.60	7.60	0.60	100	5.50	84.0
Potential To Emit (tons/year)	1.11	1.11	0.09	14.7	0.81	12.32

*PM and PM10 emission factors are filterable and condensible PM and PM10 combined.
**Emission factor for NO_x: (Uncontrolled) = 100 lb/MMCF.

METHODOLOGY
All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu
Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
One (1) Clayton Steam Bolier (identified as CB-S)

Company Name: Copperfield, LLC
Address: 3400 Union Street, Lafayette, Indiana 47904
MSOP: 157-14304
Plt ID: 157-00034
Reviewer: ERG/AR
Date: 7-Sep-01 (updated on March 11, 2004 by ERG/SD)

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	3.08E-04	1.76E-04	1.10E-02	2.64E-01	4.99E-04

HAPs - Metals

	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	7.33E-05	1.61E-04	2.05E-04	5.57E-05	3.08E-04

Total HAPs = 2.77E-01 (tons/year)

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors as provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998).
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
Heaters

Company Name: Copperfield, LLC
Address: 3400 Union Street, Lafayette, Indiana 47904
MSOP: 157-14304
Plt ID: 157-00034
Reviewer: ERG/AR
Date: 7-Sep-01 (updated on March 11, 2004 by ERG/SD)

Heat Input Capacity (MMBtu/hour)	Potential Throughput (MMCF/year)
4.01	35

Pollutant

	* PM	* PM10	SO_2	** NO_x	VOC	CO
Emission Factor (lb/MMCF)	7.60	7.60	0.60	100	5.50	84.0
Potential To Emit (tons/year)	0.13	0.13	0.01	1.75	0.10	1.47

*PM and PM10 emission factors are filterable and condensible PM and PM10 combined.
**Emission factor for NO_x: (Uncontrolled) = 100 lb/MMCF.

METHODOLOGY
All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMCF/1000 MMBtu
Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR<100
One (1) Clayton Steam Bolier (identified as CB-S)

Company Name: Copperfield, LLC
Address: 3400 Union Street, Lafayette, Indiana 47904
MSOP: 157-14304
Plt ID: 157-00034
Reviewer: ERG/AR
Date: 7-Sep-01 (updated on March 11, 2004 by ERG/SD)

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	3.68E-05	2.11E-05	1.32E-03	3.16E-02	5.96E-05

HAPs - Metals

	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	8.77E-06	1.93E-05	2.46E-05	6.67E-06	3.68E-05

Total HAPs = 3.31E-02 (tons/year)

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors as provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
VOC and HAP Emissions
From Wire Mills

Company Name: Copperfield, LLC
Address: 3400 Union Street, Lafayette, Indiana 47904
MSOP: 157-14304
Plt ID: 157-00034
Reviewer: ERG/AR
Date: 7-Sep-01 (updated on March 11, 2004 by ERG/SD)

Solution	Max. Product Usage (gal/year)	Max. Product Usage (lbs/year)	VOC Content (%)	PTE of VOC (tons/year)	Formaldehyde Content %	PTE of Formaldehyde (tons/year)	Diethanolamine Content (%)	PTE of Diethanolamime (tons/year)
Emulsion Cleaner	240	1761	0.02	1.76E-04			---------	---------
ADL-17	1032	1902					---------	---------
HSDL 20/25	996	8349					---------	---------
Aquagene	972	8917	0.01	4.46E-04			---------	---------
Additive "T"	1038	9748	11	0.54			10	0.49
S-42	60	463					---------	---------
Lubricity Additive	120	1021					---------	---------
Koolex X-10	240	1861					---------	---------
Koolex X-255	120	963					---------	---------
Triadine	60	580	21.5	0.062			---------	---------
GWR #600	48	452					---------	---------
ADL foamer	60	480					---------	---------
Copper Tech Z	120	971	25.0	0.12	0.50	0.0024	---------	---------
Defoamer "D"	180	1321	1.00	6.61E-03			---------	---------
TOTAL				**0.73**		**0.0024**		**0.49**

TOTAL HAPS (in tons per year) = 0.49

METHODOLOGY
PTE of VOC/HAP (tons/year) = Maximum product usage (lbs/year) * VOC/HAP content (%) * 1 ton/2000 lbs.

Appendix A: Emission Calculations
Summary of Emissions

Company Name: Copperfield, LLC
Address: 3400 Union Street, Lafayette, Indiana 47904
MSOP: 157-14304
Plt ID: 157-00034
Reviewer: ERG/AR
Date: 7-Sep-01 (updated on March 11, 2004 by ERG/SD)

POTENTIAL TO EMIT IN TONS PER YEAR

Emission Unit	PM	PM10	SO_2	NOx	VOC	CO	HAPs
CV lines	2.02E-04	2.02E-04			3.59		6.61
Boiler (identified as C-S)	0.43	0.43	0.03	5.64	0.31	4.74	0.11
Bolier (identified as KF-S)	0.86	0.86	0.07	11.3	0.62	9.47	0.21
Bolier (identified as CB-S)	1.11	1.11	0.09	14.7	0.81	12.3	0.28
Heaters	0.13	0.13	0.01	1.75	0.10	1.47	0.03
Wire Mills					0.73		0.49
TOTAL	**2.53**	**2.53**	**0.20**	**33.3**	**6.15**	**28.0**	**7.73**