



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
MC 61-53 IGCN 1003  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

TO: Interested Parties / Applicant  
DATE: June 29, 2007  
RE: Copperfield LLC / 157-24201-00034  
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 according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot 03/23/06



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## Minor Source Operating Permit Renewal 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 source 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M157-24201-00034	
Original signed by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: June 29, 2007  Expiration Date: June 29, 2012

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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)]

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The Permittee owns and operates a stationary Wire and Cable Manufacturing.

Source Address:	3400 Union Street, Lafayette, Indiana 47904
Mailing Address:	1115 W North Street, Bremen, IN
General Source Phone Number:	574-546-5995
SIC Code:	2822 and 3357
County Location:	Tippecanoe
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset 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

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This stationary source consists of the following emission 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, constructed in 1996;
- (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, constructed in 1985;
- (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, constructed in 1985;
- (g) One (1) rod mill, constructed in 1995 with a capacity of 7000lb/hr;
- (h) Three (3) wire mills, constructed in 1995 with a combined capacity of 3000lb/hr;

- (i) One (1) compactor for crushing empty boxes and bags;
- (j) One (1) bag baler, constructed in 1996;
- (k) Four (4) parts washers, constructed in 1991;
- (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

### B.1 Definitions [326 IAC 2-1.1-1]

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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.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

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- (a) This permit, M157-24201-00034, 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, until the renewal permit has been issued or denied.

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

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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

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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

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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

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

### B.7 Duty to Provide Information

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- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

#### B.8 Certification

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

#### B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice 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,  
MC 61-53 IGCN 1003  
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

#### B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M157-24201-00034 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted
- (b) All previous registrations and permits are superseded by this permit.

**B.12 Termination of Right to Operate [326 IAC 2-6.1-7(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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

**B.13 Permit Renewal [326 IAC 2-6.1-7]**

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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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least ninety (90) days 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 2-6.1 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.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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(a) Permit amendments and revisions are governed by 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

**B.15 Source Modification Requirement**

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

**B.16 Inspection and Entry**

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

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

**B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

**B.18 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) 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.19 Credible Evidence [326 IAC 1-1-6]**

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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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]**

Pursuant to 326 IAC 2-1.1-9 (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.3 Opacity [326 IAC 5-1]**

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

**C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

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

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52 IGCN 1003  
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

**Testing Requirements [326 IAC 2-6.1-5(a)(2)]**

**C.8 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  
MC 61-53 IGCN 1003  
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

**C.9 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 2-6.1-5(a)(2)]**

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

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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] [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.12 Instrument Specifications [326 IAC 2-1.1-11]**

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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 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 instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

### **Corrective Actions and Response Steps**

#### **C.13 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 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### **Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]**

#### **C.14 Malfunctions Report [326 IAC 1-6-2]**

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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 more than 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.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (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) 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.
- (e) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (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;

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

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

#### D.1.1 Particulate Matter (Particulate Emission Limitations for Sources of Indirect Heating) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(d) (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from the Keeler Faber Boiler shall be limited to 0.8 pounds of PM per million British thermal units.

The PM limit was calculated using the equation below:

$$\begin{aligned} Pt &= \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} \\ &= 1.8 \text{ lb/MMBtu/hr} \end{aligned}$$

Where  $C = 50 \text{ u/m}^3$

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

Q = total source maximum operating capacity rating (MMBtu/hr)

N = number of stacks

a = plume rise factor (0.67)

h = stack height, (47.5ft)

Pursuant to 326 IAC 6-2-3(d), the PM emissions shall not exceed 0.8 lb/MMBtu heat input.

D.1.2 Particulate Matter (Particulate Emission Limitations for Sources of Indirect Heating)  
[326 IAC 6-2-4]

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Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from the Clever Brooks Boiler and the Clayton Steam Boiler 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.1.3 General Provision Relating to New Source Performance Standards [326 IAC 12-1]  
[40 CFR 60, Subpart A]

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(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for the Clayton Steam Boiler and Clever Brooks Boiler except as otherwise specified in 40 CFR Part 60, Subpart Dc.

(b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue,  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

D.1.4 Standard of Performance for Small Industrial-Commercial Institutional Steam Generating Units  
[40 CFR 60, Subpart Dc]

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Pursuant to 40 CFR 60 Subpart Dc, the Permittee shall comply with the provisions of Standard of Performance for Small Industrial-Commercial Institutional Steam Generating Units for the Clayton Steam Boiler and Clever Brooks Boiler as specified as follows:

**§ 60.40c Applicability and delegation of authority.**

(a) Except as provided in paragraph (d) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).

(b) In delegating implementation and enforcement authority to a State under section 111(c) of the Clean Air Act, §60.48c(a)(4) shall be retained by the Administrator and not transferred to a State.

Facility covered by an EPA approved State or Federal section 111(d)/129 plan implementing subpart BBBB of this part is not covered by this subpart.

[55 FR 37683, Sept. 12, 1990, as amended at 61 FR 20736, May 8, 1996; 71 FR 9884, Feb. 27, 2006]

**§ 60.41c Definitions.**

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.

*Annual capacity factor* means the ratio between the actual heat input to a steam generating unit from an individual fuel or combination of fuels during a period of 12 consecutive calendar months and the potential heat input to the steam generating unit from all fuels had the steam generating unit been operated for 8,760 hours during that 12-month period at the maximum design heat input capacity. In the case of steam generating units that are rented or leased, the actual heat input shall be determined based on the combined heat input from all operations of the affected facility during a period of 12 consecutive calendar months.

*Coal* means all solid fuels classified as anthracite, bituminous, subbituminous, or lignite by the American Society of Testing and Materials in ASTM D388–77, 90, 91, 95, or 98a, Standard Specification for Classification of Coals by Rank (IBR—see §60.17), coal refuse, and petroleum coke. Coal-derived synthetic fuels derived from coal for the purposes of creating useful heat, including but not limited to solvent refined coal, gasified coal, coal-oil mixtures, and coal-water mixtures, are also included in this definition for the purposes of this subpart.

*Coal refuse* means any by-product of coal mining or coal cleaning operations with an ash content greater than 50 percent (by weight) and a heating value less than 13,900 kilojoules per kilogram (kJ/kg) (6,000 Btu per pound (Btu/lb) on a dry basis.

*Cogeneration steam generating unit* means a steam generating unit that simultaneously produces both electrical (or mechanical) and thermal energy from the same primary energy source.

*Combined cycle system* means a system in which a separate source (such as a stationary gas turbine, internal combustion engine, or kiln) provides exhaust gas to a steam generating unit.

*Combustion research* means the experimental firing of any fuel or combination of fuels in a steam generating unit for the purpose of conducting research and development of more efficient combustion or more effective prevention or control of air pollutant emissions from combustion, provided that, during these periods of research and development, the heat generated is not used for any purpose other than preheating combustion air for use by that steam generating unit (i.e., the heat generated is released to the atmosphere without being used for space heating, process heating, driving pumps, preheating combustion air for other units, generating electricity, or any other purpose).

*Conventional technology* means wet flue gas desulfurization technology, dry flue gas desulfurization technology, atmospheric fluidized bed combustion technology, and oil hydrodesulfurization technology.

*Distillate oil* means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396–78, 89, 90, 92, 96, or 98, “Standard Specification for Fuel Oils” (incorporated by reference—see §60.17).

*Dry flue gas desulfurization technology* means a sulfur dioxide (SO<sub>2</sub>) control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a dry powder material. This definition includes devices where the dry powder material is subsequently converted to another form. Alkaline reagents used in dry flue gas desulfurization systems include, but are not limited to, lime and sodium compounds.

*Duct burner* means a device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

*Emerging technology* means any SO<sub>2</sub> control system that is not defined as a conventional technology under this section, and for which the owner or operator of the affected facility has received approval from the Administrator to operate as an emerging technology under §60.48c(a)(4).

*Federally enforceable* means all limitations and conditions that are enforceable by the Administrator, including the requirements of 40 CFR Parts 60 and 61, requirements within any applicable State implementation plan, and any permit requirements established under 40 CFR 52.21 or under 40 CFR 51.18 and 40 CFR 51.24.

*Fluidized bed combustion technology* means a device wherein fuel is distributed onto a bed (or series of beds) of limestone aggregate (or other sorbent materials) for combustion; and these materials are forced upward in the device by the flow of combustion air and the gaseous products of combustion. Fluidized bed combustion technology includes, but is not limited to, bubbling bed units and circulating bed units.

*Fuel pretreatment* means a process that removes a portion of the sulfur in a fuel before combustion of the fuel in a steam generating unit.

*Heat input* means heat derived from combustion of fuel in a steam generating unit and does not include the heat derived from preheated combustion air, recirculated flue gases, or exhaust gases from other sources (such as stationary gas turbines, internal combustion engines, and kilns).

*Heat transfer medium* means any material that is used to transfer heat from one point to another point.

*Maximum design heat input capacity* means the ability of a steam generating unit to combust a stated maximum amount of fuel (or combination of fuels) on a steady state basis as determined by the physical design and characteristics of the steam generating unit.

*Natural gas* means (1) a naturally occurring mixture of hydrocarbon and nonhydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane, or (2) liquefied petroleum (LP) gas, as defined by the American Society for Testing and Materials in ASTM D1835–86, 87, 91, or 97, “Standard Specification for Liquefied Petroleum Gases” (incorporated by reference—see §60.17).

*Noncontinental area* means the State of Hawaii, the Virgin Islands, Guam, American Samoa, the Commonwealth of Puerto Rico, or the Northern Mariana Islands.

*Oil* means crude oil or petroleum, or a liquid fuel derived from crude oil or petroleum, including distillate oil and residual oil.

*Potential sulfur dioxide emission rate* means the theoretical SO<sub>2</sub> emissions (nanograms per joule [ng/J], or pounds per million Btu [lb/million Btu] heat input) that would result from combusting fuel in an uncleaned state and without using emission control systems.

*Process heater* means a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst.

*Residual oil* means crude oil, fuel oil that does not comply with the specifications under the definition of distillate oil, and all fuel oil numbers 4, 5, and 6, as defined by the American Society for Testing and Materials in ASTM D396–78, 89, 90, 92, 96, or 98, “Standard Specification for Fuel Oils” (incorporated by reference—see §60.17).

*Steam generating unit* means a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart.

*Steam generating unit operating day* means a 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time in the steam generating unit. It is not necessary for fuel to be combusted continuously for the entire 24-hour period.

*Wet flue gas desulfurization technology* means an SO<sub>2</sub> control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a liquid material. This definition includes devices where the liquid material is subsequently converted to another form. Alkaline reagents used in wet flue gas desulfurization systems include, but are not limited to, lime, limestone, and sodium compounds.

*Wet scrubber system* means any emission control device that mixes an aqueous stream or slurry with the exhaust gases from a steam generating unit to control emissions of particulate matter (PM) or SO<sub>2</sub>.

*Wood* means wood, wood residue, bark, or any derivative fuel or residue thereof, in any form, including but not limited to sawdust, sanderdust, wood chips, scraps, slabs, millings, shavings, and processed pellets made from wood or other forest residues.

[55 FR 37683, Sept. 12, 1990, as amended at 61 FR 20736, May 8, 1996; 65 FR 61752, Oct. 17, 2000; 71 FR 9884, Feb. 27, 2006]

**§ 60.48c Reporting and recordkeeping requirements.**

(a) The Permittee of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by §60.7 of this part. This notification shall include:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

(g) The permittee of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. The Permittee of an affected facility that only burns very low sulfur fuel oil or other liquid or gaseous fuels with potential sulfur dioxide emissions rate of 140 ng/J (0.32 lb/MMBtu) heat input or less shall record and maintain records of the fuels combusted during each calendar month.

(i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

(j) The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

[55 FR 37683, Sept. 12, 1990, as amended at 64 FR 7465, Feb. 12, 1999; 65 FR 61753, Oct. 17, 2000; 71 FR 9886, Feb. 27, 2006]

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (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, constructed in 1995;
- (f) Two (2) Continuous Vulcanization-slope lines, referred to as CV-5 and Cv-6, each with a maximum capacity of 726 pounds of rubber per hour, constructed in 1995;

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

### Emission Limitations and Standards

#### D.2.1 Particulate Matter (Particulate Emission Limitations for Manufacturing Processes) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3(e) (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 each when operating at a process weight rate of 762 pounds per hour.
- (b) 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:

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

#### D.2.2 Volatile Organic Compounds (Cold Cleaner Operation) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the Permittee 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 (Cold Cleaner Degreaser Operation and Control) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee 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 ( $38^{\circ}\text{C}$ ) (one hundred degrees Fahrenheit ( $100^{\circ}\text{F}$ ));
    - (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 ( $38^{\circ}\text{C}$ ) (one hundred degrees Fahrenheit ( $100^{\circ}\text{F}$ )), 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 ( $38^{\circ}\text{C}$ ) (one hundred degrees Fahrenheit ( $100^{\circ}\text{F}$ )), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius ( $48.9^{\circ}\text{C}$ ) (one hundred twenty degrees Fahrenheit ( $120^{\circ}\text{F}$ )):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee 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**

**MINOR SOURCE OPERATING PERMIT (MSOP)  
CERTIFICATION**

Source Name: Copperfield, LLC  
Source Address: 3400 Union Street, Lafayette, Indiana 47904  
Mailing Address: 1115 W North Street, Bremen, Indiana 46506  
MSOP No.: M157-24201-00034

**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 Notification
- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Affidavit (specify) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH**

**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).

<b>Company Name:</b>	Copperfield, LLC
<b>Address:</b>	3400 Union Street
<b>City:</b>	Lafayette, Indiana 47904
<b>Phone #:</b>	574-546-5995
<b>MSOP #:</b>	M157-24201-00034

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 M157-24201-00034.

not in compliance with the requirements of MSOP M157-24201-00034.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

**MALFUNCTION REPORT**  
**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**FAX NUMBER - 317 233-6865**

**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 PERM 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:

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

**SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Copperfield, LLC  
Source Address: 3400 Union Street, Lafayette, Indiana 47904  
Mailing Address: 1115 W North Street, Bremen, IN  
MSOP Permit No.: M157-24201-00034

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

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

A certification by an authorized individual as defined by 326 IAC 2-1.1-1(1) is required for this report.

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

**Addendum to the Technical Support Document  
for Minor Source Operating Permit (MSOP) Renewal**

**Source Background and Description**

<b>Source Name:</b>	Copperfield, LLC
<b>Source Location:</b>	3400 Union Street, Lafayette, IN 47904
<b>County:</b>	Tippecanoe
<b>SIC Code:</b>	2822 and 3357
<b>Permit Renewal No.:</b>	M157-24201-00034
<b>Permit Reviewer:</b>	Josiah Balogun

On May 20, 2007, the Office of Air Quality (OAQ) had a notice published in the Journal and Courier, Lafayette, Indiana, stating that Copperfield, LLC had applied for a Minor Source Operating Permit (MSOP) renewal to continue to operate a wire and cable manufacturing facility. The notice also stated that OAQ proposed to issue a MSOP renewal for this operation and provided information on how the public could review the proposed MSOP renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this MSOP renewal should be issued as proposed.

Upon further review IDEM, OAQ has made the following changes to the MSOP permit. (deleted language appears as ~~strikeout~~.)

**Change 1:**

The July 5, 2005 version of 40 CFR, Subpart DC (New Sources Performance Standard) has been included in the Indiana rule.

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflects the permit that was on public notice. Changes that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result, ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Condition D.1.5 has been deleted from the permit.

~~D.1.5 State-Only Standard of performance for Small Industrial-Commercial-Institutional Steam Generating Units (New source Performance Standards) Requirements [326 IAC 12]~~

~~Pursuant to 326 IAC 12, the Permittee shall comply with the provisions of July 5, 2005 version of 40 CFR part 60, Subpart Dc, which are incorporated by reference by 326 IAC 12, for the clayton steam Boiler and Clever Brooks Boiler. The Permittee shall comply with the provisions of 40 CFR Part 60, Subpart Dc, as listed in Condition D.1.4, except the Permittee shall follow the requirements of the July 5, 2005 version, as incorporated into 326 IAC 12, as follows:~~

~~**§ 60.48c Reporting and recordkeeping requirements.**~~

~~(g) The Permittee of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.~~

~~The requirements of 326 IAC 12 listed in this condition are not federally enforceable.~~



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

Technical Support Document (TSD) for a  
Minor Source Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	Copperfield, LLC
<b>Source Location:</b>	3400 Union Street, Lafayette, IN 47904
<b>County:</b>	Tippecanoe
<b>SIC Code:</b>	2822 and 3357
<b>Permit Renewal No.:</b>	M157-24201-00034
<b>Permit Reviewer:</b>	Josiah Balogun

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Copperfield, LLC relating to the operation of a wire and cable manufacturing facility.

**History**

On January 16, 2007, Copperfield, LLC submitted an application to the OAQ requesting to renew its Minor Source Operating Permit. Copperfield, LLC was issued a MSOP on March 20, 2002.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) natural gas-fired boiler, 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, constructed in 1996;
- (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, constructed in 1985;
- (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, constructed in 1985;
- (g) One (1) rod mill, constructed in 1995 with a capacity of 7000lb/hr;
- (h) Three (3) wire mills, constructed in 1995, with a combined capacity of 3000lb/hr;
- (i) One (1) compactor for crushing empty boxes and bags;
- (j) One (1) bag baler, constructed in 1996;
- (k) Four (4) parts washers, constructed in 1991;
- (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.

#### **Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit**

There are no unpermitted facilities operating at this source during this review process

#### **Emission Units and Pollution Control Equipment Removed From the Source**

No equipment has been removed from this source during this review process

#### **Existing Approvals**

Since the issuance of the Minor Source Operating Permit M157-14304-00034 on March 20, 2002 the source has constructed or has been operating under the following approvals as well:

- (a) Notice-only Change 157-15428-00034, issued on April 24, 2002;
- (b) Transfer of Ownership 157-16504-00034, issued on December 11, 2002;
- (c) Notice-only Change 157-17497-00034, issued on April 30, 2003;
- (d) Notice-Only Change 157-18488-00034, issued on April 13, 2004.

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 registrations and permits are superseded by this permit.

#### **Enforcement Issue**

There are no enforcement actions pending.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
KF-S	Stack	47.5	1.5	15,000	350
CB-S	Stack	47.5	1.5	15,000	350
C-S	Stack	37.5	1.75	5,000	350
CV-1V	Vent	32.5	0.5	NA	350
CV-2V	Vent	32.5	0.5	NA	350
CV-5V	Vent	32.5	0.5	NA	350
CV-6V	Vent	32.5	0.5	NA	350

**Emission Calculations**

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

**County Attainment Status**

The source is located in Tippecanoe County.

Pollutant	Status
PM <sub>10</sub>	Attainment
PM <sub>2.5</sub>	Attainment
SO <sub>2</sub>	Attainment
NOx	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Tippecanoe County has been classified as attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Tippecanoe County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Tippecanoe County has been classified as attainment or unclassifiable in Indiana for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

- (d) 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.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	0.6
PM-10	2.5
SO <sub>2</sub>	0.23
VOC	5.6
CO	28
NO <sub>x</sub>	33.4
PB	< 5

HAPs	tons/year
Single Haps	< 10
Total	7.73

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1995 OAQ emission data.

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

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this MSOP 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
Boilers	0.6	2.4	0.23	1.7	26.5	31.6	0.6
Heaters	0.0	0.1	-	0.1	1.5	1.8	0.03
Continuous Vulcanization Lines	-	-	-	3.6	-	-	6.6
Wire mill	-	-	-	0.2	-	-	0.5
Total Emissions	0.6	2.5	0.23	5.6	28	33.4	7.73

- (a) This existing stationary source is not major for PSD because the emissions of each attainment pollutants are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

**Federal Rule Applicability**

40 CFR 60, Subpart Dc - Standard of Performance for Small Industrial-Commercial Institutional Steam Generating Unit

- (a) The Clayton Steam Boiler and the Clever Brooks boiler are subject to the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc, Standard of Performance for Small Industrial-Commercial Institutional Steam Generating Unit because these boilers were constructed in 1996 and 1994, respectively, which is after June 9, 1989, which is the applicability date for this rule and these boilers have a heat input capacity of less than 100 million Btu per hour, but greater than 10 million Btu per hour. The specific facilities subject to this rule includes the following;
  - (1) Clayton Steam Boiler; and
  - (2) Clever Brooks boiler.

Nonapplicable portions of the NSPS will not be included in the permit. The Clayton Steam Boiler and Clever Brooks Boiler are subject to the following portions of Subpart Dc;

- (1) 40 CFR 60.40c (a)(b);
  - (2) 40 CFR 60.41c
  - (3) 40 CFR 60.48c (a)(1), (g), (i), (j)
- (b) The requirements of the New Source Performance Standard for 326 IAC 12, 40 CFR 60, Subpart Dc (Standard of Performance for Small Industrial-Commercial

Institutional Steam Generating Unit), are not included in the permit for the Keller Faber Boiler. Construction of this unit commenced prior to June 9, 1989.

326 IAC 14, 20 and 40 CFR Part 61, 63

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit for this source.

### State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

Revision to 326 IAC 2-6 (Emission Reporting) became effective March 27, 2004. The Permittee is no longer required to submit an emission statement; therefore, the emission statement is removed from the permit.

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.

### State Rule Applicability – Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The continuous vulcanization lines, constructed in 1997, will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

The continuous vulcanization lines were constructed before 1980 and thermoplastic extrusion lines do not have potential VOC emissions equal to or greater than twenty five (25) tons per year, therefore these emission units are not subject to the provisions of 326 IAC 8-1-6.

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

326 IAC 6-2-3(d) (Particulate Emission Limitations for Sources of Indirect Heating) applies to the Keeler Faber Boiler because it was constructed before June 8, 1972. Therefore, 326 IAC 6-2-3 is applicable.

The PM limit was calculated using the equation below:

$$\begin{aligned} Pt &= \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} \\ &= 1.8 \text{ lb/MMBtu/hr} \end{aligned}$$

Where  $C = 50 \text{ u/m}^3$

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

Q = total source maximum operating capacity rating (MMBtu/hr)

N = number of stacks  
 a = plume rise factor (0.67)  
 h = stack height, 47.5 (ft)

However, pursuant to 326 IAC 6-2-3(d), PM emissions from this boiler shall not exceed 0.8 lbs/MMBtu heat input.

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

The Clever Brooks boiler and Clayton Steam boiler are subject to 326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating) because they were constructed in 1994 and 1996, respectively. Pursuant to this rule, the particulate matter emissions from the Clever Brooks boiler and Clayton Steam boiler shall be limited as follows:

Year	Unit	Q (MMBtu/hr)	Pt (lb/MMBtu)	Emission Limit (lb/MMBtu)
1994	Clever	25.75 + 33.48 = 59.2	0.38	0.38
1996	Clayton	25.75 + 33.48 + 12.88 = 72.1	0.36	0.36

The above values were determined from the following equation:

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

where

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and  
 Q = Total source maximum operating capacity (MMBtu/hr)

326 IAC 6-3-2 (Particulate emission limitations for manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (e), the following PM limits shall apply:

- (a) The allowable PM emission rate from the continuous vulcanization lines shall each not exceed 2.1 pounds per hour each when operating at a process weight rate of 762 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:

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

326 IAC 8-3-2 (Organic Solvent Degreasing Operations)

The four (4) parts washers were built after January 1, 1980, therefore, 326 IAC 8-3-2 applies. 326 IAC 8-3-5 also applies to this equipment because it was built after July 1, 1990.

### 326 IAC 12 (New Sources Performance Standard)

The Clayton Steam and Clever Brooks Boilers are subject to 326 IAC 12 (New Sources Performance Standard).

Subpart Dc was revised on February 27, 2006. However, pursuant to 326 IAC 1-1-3, the version of the rule referenced by 326 IAC 12 was the version in existence on July 5, 2005, which had been most recently amended on February 27, 2007. Therefore, the February 27, 2007, amendments to the federal rule are not approved into the 326 IAC, and the two (2) boilers at this source are subject to both versions of the rule. All of the requirements of 326 IAC 12 rule that are applicable to this source are the same as the requirements listed under the Federal Rule Applicability Determination section except for the following:

40 CFR 60.48c (g)

The 326 IAC version of 40 CFR 60.48c (g) requires the Permittee of each affected facility to record and maintain records of the amounts of each fuel combusted during each day. The new version requires the Permittee of each affected facility to that burns only very low sulfur fuel oil or other liquid or gaseous fuels with potential sulfur dioxide emission rate of 140ng/J (.32lb/MMBtu) heat input or less to record and maintain records of the fuels combusted during each calendar month. Both will be included in the permit.

### Recommendation

The staff recommends to the Commissioner that the Minor Source Operating Permit 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 application for the purposes of this review was received on January 16, 2007.

### Conclusion

The operation of this rubber and plastic manufacturing facility shall be subject to the conditions of the attached Minor Source Operating Permit M157-24201-00034.

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

**Company Name:** Copperfield, LLC  
**Address City IN Zip:** 3400 Union Street, Lafayette, IN 47904  
**Permit ID:** M157-24201-00034  
**Reviewer:** Josiah Balogun  
**Date:** 29-Mar-07

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

Note: Emission factor for Rubber extrusion from AP-42 CH 6: (Emission factor of 87lb/1000)

Emissions Due to InkJet Printing

Product	gal/yr	lb/gal	wt% VOC	VOC tons/yr	wt% HAP	HAP tons/yr
Ink	12	8.01	70	0.03	5	0.00
Makeup	6	6.67	100	0.02	70	0.01
Wash	21	6.67	100	0.07	100	0.07
Total				0.12		0.09

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	0.00	3.59	6.61

**Appendix A: Emission Calculations  
 Natural Gas Combustion Only  
 MMBTU/HR<100  
 C-S Boiler**

**Company Name:** Copperfield, LLC  
**Address City IN Zip:** 3400 Union Street, Lafayette, IN 47904  
**Permit ID:** M157-24201-00034  
**Reviewer:** Josiah Balogun  
**Date:** 29-Mar-07

Heat Input Capacity  
 MMBtu/hr

Potential Throughput  
 MMCF/yr

12.9
------

112.8

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NO <sub>x</sub>	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.4	0.03	5.6	0.3	4.7

\*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.  
 \*\*Emission Factors for NO<sub>x</sub>: Uncontrolled = 100, Low NO<sub>x</sub> Burner = 50, Low NO<sub>x</sub> Burners/Flue gas recirculation = 32

**Methodology**

All Emission factors are based on normal firing.  
 MMBtu = 1,000,000 Btu  
 MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
 Emission Factors 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 (AP-42 Supplement D 3/98)  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations**  
**Natural Gas Combustion Only**  
**MMBTU/HR<100**  
**C-S Boiler**

**Company Name:** Copperfield, LLC  
**Address City IN Zip:** 3400 Union Street, Lafayette, IN 47904  
**Permit:** M157-24201-00034  
**Reviewer:** Josiah Balogun  
**Date:** 29-Mar-07

HAPs - Organics

Emission Factor in lb/MMCF	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.185E-04	6.770E-05	4.231E-03	1.015E-01	1.918E-04

HAPs - Metals

Emission Factor in lb/MMCF	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.821E-05	6.206E-05	7.898E-05	2.144E-05	1.185E-04

Total HAPs = 1.065E-01 tpy

Methodology is the same as previous page.

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

**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
MMBTU/HR<100  
KF-S Boiler**

**Company Name:** Copperfield, LLC  
**Address City IN Zip:** 3400 Union Street, Lafayette, IN 47904  
**Permit ID:** M157-24201-00034  
**Reviewer:** Josiah Balogun  
**Date:** 29-Mar-07

Heat Input Capacity  
MMBtu/hr

25.8

Potential Throughput  
MMCF/yr

225.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NO <sub>x</sub>	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.2	0.9	0.1	11.3	0.6	9.5

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

\*\*Emission Factors for NO<sub>x</sub>: Uncontrolled = 100, Low NO<sub>x</sub> Burner = 50, Low NO<sub>x</sub> Burners/Flue gas recirculation = 32

**Methodology**

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

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

Emission Factors 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 (AP-42 Supplement D 3/98)

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

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
MMBTU/HR<100  
KF-S Boiler**

**Company Name:** Copperfield, LLC  
**Address City IN Zip:** 3400 Union Street, Lafayette, IN 47904  
**Permit ID :** M157-24201-00034  
**Reviewer:** Josiah Balogun  
**Date:** 29-Mar-07

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMCF	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.368E-04	1.353E-04	8.459E-03	2.030E-01	3.835E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMCF	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	5.639E-05	1.241E-04	1.579E-04	4.286E-05	2.368E-04

Total HAPs = 2.128E-01 tpy

Methodology is the same as previous page.

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

**Appendix A: Emission Calculations  
 Natural Gas Combustion Only  
 MMBTU/HR<100  
 CB-S Boiler**

**Company Name:** Copperfield, LLC  
**Address City IN Zip:** 3400 Union Street, Lafayette, IN 47904  
**Permit ID:** M157-24201-00034  
**Reviewer:** Josiah Balogun  
**Date:** 29-Mar-07

Heat Input Capacity  
 MMBtu/hr

Potential Throughput  
 MMCF/yr

33.5

293.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NO <sub>x</sub>	VOC	CO
Potential Emission in tons/yr	1.9	7.6	0.6	100.0 **see below	5.5	84.0
	0.3	1.1	0.1	14.7	0.8	12.3

\*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.  
 \*\*Emission Factors for NO<sub>x</sub>: Uncontrolled = 100, Low NO<sub>x</sub> Burner = 50, Low NO<sub>x</sub> Burners/Flue gas recirculation = 32

**Methodology**

All Emission factors are based on normal firing.  
 MMBtu = 1,000,000 Btu  
 MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
 Emission Factors 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 (AP-42 Supplement D 3/98)  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations  
 Natural Gas Combustion Only  
 MMBTU/HR<100  
 CB-S Boiler**

**Company Name:** Copperfield, LLC  
**Address City IN Zip:** 3400 Union Street, Lafayette, IN 47904  
**Permit ID** M157-24201-00034  
**Reviewer:** Josiah Balogun  
**Date:** 29-Mar-07

HAPs - Organics

Emission Factor in lb/MMCF	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.079E-04	1.760E-04	1.100E-02	2.640E-01	4.986E-04

HAPs - Metals

Emission Factor in lb/MMCF	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	7.332E-05	1.613E-04	2.053E-04	5.572E-05	3.079E-04

Total HAPs = 2.767E-01 tpy

Methodology is the same as previous page.

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

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

**Company Name:** Copperfield, LLC  
**Address City IN Zip:** 3400 Union Street, Lafayette, IN 47904  
**Permit ID:** M157-24201-00034  
**Reviewer:** Josiah Balogun  
**Date:** 29-Mar-07

Heat Input Capacity  
MMBtu/hr

4.0
-----

Potential Throughput  
MMCF/yr

35.1

	Pollutant					
	PM*	PM10*	SO2	NO <sub>x</sub>	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	1.8	0.1	1.5

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

\*\*Emission Factors for NO<sub>x</sub>: Uncontrolled = 100, Low NO<sub>x</sub> Burner = 50, Low NO<sub>x</sub> Burners/Flue gas recirculation = 32

**Methodology**

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

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

Emission Factors 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

(AP-42 Supplement D 3/98)

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

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

**Company Name:** Copperfield, LLC  
**Address City IN Zip:** 3400 Union Street, Lafayette, IN 47904  
**Permit ID :** M157-24201-00034  
**Reviewer:** Josiah Balogun  
**Date:** 29-Mar-07

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMCF	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.684E-05	2.105E-05	1.316E-03	3.158E-02	5.964E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMCF	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	8.771E-06	1.930E-05	2.456E-05	6.666E-06	3.684E-05

Total HAPs = 3.310E-02 tpy

Methodology is the same as previous page.

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

Appendix A: Emission Calculations  
Wire Mills

**Company Name:** Copperfield, LLC  
**Address City IN Zip:** 3400 Union Street, Lafayette, IN 47904  
**Permit ID:** M157-24201-00034  
**Reviewer:** Josiah Balogun  
**Date:** ####

Solution	Product Usage (gal/yr)	Product Usage (lbs/yr)	VOC Content (%)	VOC Emissions (tons/yr)	Formaldehyde Content (%)	Formaldehyde Emissions (tons/yr)	Diethanolamine Content (%)	Diethanolamine Emissions (tons/yr)
Emulsion Cleaner	240	1761	0.02	-----	-----	-----	-----	-----
ADL-17	1032	1902	-----	-----	-----	-----	-----	-----
HSDL 20/25	996	8349	-----	-----	-----	-----	-----	-----
Aquagene	972	8917	0.01	-----	-----	-----	-----	-----
Additive "T"	1038	9748	0.1	-----	-----	-----	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	0.06	-----	-----	-----	-----
GWR #600	48	452	-----	-----	-----	-----	-----	-----
ADL foamer	60	480	-----	-----	-----	-----	-----	-----
Copper Tech Z	120	971	25	0.12	0.5	-----	-----	-----
Defoamer "D"	180	1321	1	0.01	-----	-----	-----	-----
Totals	5286	38789	47.63	0.19	0.5	-----	-----	0.49

Appendix A: Emission Calculations  
Summary Table

**Company Name:** Copperfield, LLC  
**Address City IN Zip:** 3400 Union Street, Lafayette, IN 47904  
**Permit ID:** M157-24201-00034  
**Reviewer:** Josiah Balogun  
**Date:** 29-Mar-07

Potential to Emit in tons/year

<b>Unit</b>	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>x</sub></b>	<b>NO<sub>x</sub></b>	<b>VOC</b>	<b>CO</b>	<b>HAPs</b>
KF-S	0.20	0.90	0.10	11.30	0.60	9.50	0.21
CB-S	0.30	1.10	0.10	14.70	0.80	12.30	0.28
C-S	0.10	0.40	0.03	5.60	0.31	4.70	0.11
Wire Mill	0	0	0	0	0.19	0	0.49
CV lines	0	0	0	0	3.59	0	6.61
Heaters	0	0.1	0	1.8	0.1	1.5	0.03
<b>Total</b>	<b>0.60</b>	<b>2.50</b>	<b>0.23</b>	<b>33.40</b>	<b>5.59</b>	<b>28.00</b>	<b>7.73</b>