



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: September 23, 2008

RE: Rea Magnet Wire Company, Inc. / 003-26728-00014

FROM: Matthew Stuckey, Branch 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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) 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.

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

September 23, 2008

Ms. Pam Oleson
Rea Magnet Wire Company, Inc.
3600 East Pontiac Street
Fort Wayne, IN 46803

Re: 003-26728-00014
First Significant Permit Modification to:
Part 70 Permit (First Renewal) No.: T 003-21713-00014

Dear Ms. Oleson:

Rea Magnet Wire Company, Inc. was issued Part 70 operating permit (first renewal) T 003-21713-00014 on December 31, 2007 for a stationary magnet wire coating operation. An application to modify the source was received on July 8, 2008. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification involves the incorporation of eight (8) MAG HES-2 ovens identified as ovens 451 through 458, and four (4) SICME SEL ovens identified as 401/402, 403/404, 405/406, 407/408, changes to compliance monitoring and determination conditions, and recordkeeping and reporting requirements for these new ovens.

All other conditions of the permit shall remain unchanged and in effect. Please find enclosed the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik of my staff at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0868 or toll free at 1-800-451-6027 extension 3-0868.

Sincerely,

Original document signed by

Chrystal Wagner, Section Chief
Permits Branch
Office of Air Quality

Attachments

MM

cc: File - Allen County
Allen County Health Department
Air Compliance Section Inspector – Patrick Burton
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner



Mitchell E. Daniels, Jr.
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Thomas W. Easterly
Commissioner

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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Rea Magnet Wire Company, Inc.
3600 East Pontiac Street
Fort Wayne, Indiana 46803**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T003-21713-00014	
Issued by: Original Signed By: Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: December 31, 2007 Expiration Date: December 31, 2012

First Significant Modification No.: 003-26728-00014	
Issued by: <i>Original document signed by</i> Chrystal Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 23, 2008 Expiration Date: December 31, 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 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates stationary magnet wire coating operation

Source Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
 Mailing Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
 General Source Phone Number: (260) 421-7422
 SIC Code: 3357
 County Location: Allen
 Source Location Status: Attainment for all criteria pollutants
 Source Status: Part 70 Operating Permit Program
 Minor Source, under PSD Rules
 Minor Source, Section 112 of the Clean Air Act
 Not 1 of 28 Source Categories

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

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

(a) The following magnet wire enameling ovens:

Model	Oven ID #	Construction Date	Max. Rating (lbs wire/hr)	VOC Oxidizer Type	Stack ID #
Rea	540	Prior to 1965	0.26	None	C-2
Rea	541	Prior to 1965	0.26	None	C-2
Rea	542	Prior to 1965	0.26	None	C-2
Rea	543	Prior to 1965	0.26	None	C-2
Rea	544	Prior to 1965	0.26	None	C-2
Rea	550	Prior to 1965	0.26	None	C-1
MOCO	270	Prior to 1974	571	External thermal	D-2
MOCO	XR-1	Prior to 1980	11	External thermal	E-3
Rea H-9	243	June 1987	6	External catalytic	F-6
Rea H-9	244	May 1987	6	External catalytic	F-6
Rea H-9	245	June 1989	6	External catalytic	F-6
Rea H-9	246	June 1989	6	External catalytic	F-6
GE-I	210-213	June 1989	191	External thermal	F-1
GE-I	220-223	June 1989	191	External thermal	F-2
GE-M	230-238	June 1989	508	External thermal	F-3
Rea H-9	247	Feb. 1992	6	External catalytic	F-7
Rea H-9	248	Feb. 1992	6	External catalytic	F-7
MAG HS0	551	Nov. 1994	0.64	Internal catalytic	C-3
MAG HS0	552	Nov. 1994	0.64	Internal catalytic	C-4
MAG HS0	553	Nov. 1994	0.64	Internal catalytic	C-5
MAG HS1	561	Nov. 1994	0.91	Internal catalytic	C-6
MAG HS1	562	Nov. 1994	0.91	Internal catalytic	C-8
MAG HS1	563	Nov. 1994	0.91	Internal catalytic	C-10
MAG HS1	564	Nov. 1994	0.91	Internal catalytic	C-12
MAG HS1	565	Nov. 1994	0.91	Internal catalytic	C-14
MAG HS1	566	Nov. 1994	0.91	Internal catalytic	C-16
MAG HS1	567	Nov. 1994	0.91	Internal catalytic	C-18
Rea H-9	250	1995	6	External catalytic	F-7
Rea H-9	251	1995	6	External catalytic	F-8
Rea H-9	252	1995	6	External catalytic	F-8

Model	Oven ID #	Construction Date	Max. Rating (lbs wire/hr)	VOC Oxidizer Type	Stack ID #
Rea H-9	253	1995	6	External catalytic	F-8
Rea H-9	254	1995	6	External catalytic	F-7
SICME	281-282	1996	183	Internal thermal	D-3
SICME	283-284	1996	183	Internal thermal	D-4
SICME	285-286	1996	183	Internal thermal	D-5
MAG HES-2	451	2008	18.9	Internal thermal	C-21
MAG HES-2	452	2008	18.9	Internal thermal	C-22
MAG HES-2	453	2008	18.9	Internal thermal	C-23
MAG HES-2	454	2008	18.9	Internal thermal	C-24
MAG HES-2	455	2008	18.9	Internal thermal	C-25
MAG HES-2	456	2008	18.9	Internal thermal	C-26
MAG HES-2	457	2008	18.9	Internal thermal	C-27
MAG HES-2	458	2008	18.9	Internal thermal	C-28
SICME SEL	401/402	2008	34.4	Internal thermal	D-20
SICME SEL	403/404	2008	34.4	Internal thermal	D-21
SICME SEL	405/406	2008	34.4	Internal thermal	D-22
SICME SEL	407/408	2008	34.4	Internal thermal	D-23

- (b) One (1) 16.7 MMBtu per hour natural gas-fired firetube boiler, identified as CB266-500, constructed in 1965, and exhausting to stack A-2.

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

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, not subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5].
- (b) Activities with emissions equal to or less than the following thresholds: 5 lb/hr and 25 lb/day PM₁₀; 5 lb/hr and 25 lb/day SO₂; 5 lb/hr and 25 lb/day NO_x; 3 lb/hr and 15 lb/day VOC; 0.6 tons per year Pb; 5 lb/day and 1.0 ton/yr of a single HAP, and 12.5 lb/day and 2.5 ton/yr of any combination of HAPs, consisting of one (1) paint spray booth [326 IAC 6-3-2].
- (c) One (1) 6.0 MMBtu per hour natural gas-fired boiler, identified as Bryan RV600, constructed in 2002 and exhausting to stack A-1. [326 IAC 6-2-3]

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

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

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

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T003-21713-00014, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This

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

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) The "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

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

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

B.11 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T003-21713-00014 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

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

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40) The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this .
- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

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

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios Part 70 Operating Permit
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and 326 IAC 2-3-2.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

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

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

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

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (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 [326 IAC 2-7-5][326 IAC 2-7-6] or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on October 21, 1996.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

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

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

- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

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

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

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

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

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

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by

any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

- (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) If there is a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit or at a source with Plant-wide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1(z)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
 - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]
[326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx) and/or 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and
- (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
- (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
- (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
- (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

- (h) 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.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Magnet Wire Coating Ovens

(a) The following magnet wire enameling ovens:

Model	Oven ID #	Construction Date	Max. Rating (lbs wire/hr)	VOC Oxidizer Type	Stack ID #
Rea	540	Prior to 1965	0.26	None	C-2
Rea	541	Prior to 1965	0.26	None	C-2
Rea	542	Prior to 1965	0.26	None	C-2
Rea	543	Prior to 1965	0.26	None	C-2
Rea	544	Prior to 1965	0.26	None	C-2
Rea	550	Prior to 1965	0.26	None	C-1
MOCO	270	Prior to 1974	571	External thermal	D-2
MOCO	XR-1	Prior to 1980	11	External thermal	E-3
Rea H-9	243	June 1987	6	External catalytic	F-6
Rea H-9	244	May 1987	6	External catalytic	F-6
Rea H-9	245	June 1989	6	External catalytic	F-6
Rea H-9	246	June 1989	6	External catalytic	F-6
GE-I	210-213	June 1989	191	External thermal	F-1
GE-I	220-223	June 1989	191	External thermal	F-2
GE-M	230-238	June 1989	508	External thermal	F-3
Rea H-9	247	Feb. 1992	6	External catalytic	F-7
Rea H-9	248	Feb. 1992	6	External catalytic	F-7
MAG HS0	551	Nov. 1994	0.64	Internal catalytic	C-3
MAG HS0	552	Nov. 1994	0.64	Internal catalytic	C-4
MAG HS0	553	Nov. 1994	0.64	Internal catalytic	C-5
MAG HS1	561	Nov. 1994	0.91	Internal catalytic	C-6
MAG HS1	562	Nov. 1994	0.91	Internal catalytic	C-8
MAG HS1	563	Nov. 1994	0.91	Internal catalytic	C-10
MAG HS1	564	Nov. 1994	0.91	Internal catalytic	C-12
MAG HS1	565	Nov. 1994	0.91	Internal catalytic	C-14
MAG HS1	566	Nov. 1994	0.91	Internal catalytic	C-16
MAG HS1	567	Nov. 1994	0.91	Internal catalytic	C-18
Rea H-9	250	1995	6	External catalytic	F-7
Rea H-9	251	1995	6	External catalytic	F-8
Rea H-9	252	1995	6	External catalytic	F-8
Rea H-9	253	1995	6	External catalytic	F-8
Rea H-9	254	1995	6	External catalytic	F-7
SICME	281-282	1996	183	Internal thermal	D-3
SICME	283-284	1996	183	Internal thermal	D-4
SICME	285-286	1996	183	Internal thermal	D-5
MAG HES-2	451	2008	18.9	Internal thermal	C-21
MAG HES-2	452	2008	18.9	Internal thermal	C-22
MAG HES-2	453	2008	18.9	Internal thermal	C-23
MAG HES-2	454	2008	18.9	Internal thermal	C-24
MAG HES-2	455	2008	18.9	Internal thermal	C-25
MAG HES-2	456	2008	18.9	Internal thermal	C-26
MAG HES-2	457	2008	18.9	Internal thermal	C-27
MAG HES-2	458	2008	18.9	Internal thermal	C-28
SICME SEL	401/402	2008	34.4	Internal thermal	D-20
SICME SEL	403/404	2008	34.4	Internal thermal	D-21
SICME SEL	405/406	2008	34.4	Internal thermal	D-22
SICME SEL	407/408	2008	34.4	Internal thermal	D-23

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

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

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-5 (Site Specific RACT)]

- (a) Pursuant to CP-003-9913-00014, issued October 28, 1998 and 326 IAC 8-1-5, the magnet wire enameling ovens identified as 247, 248, 250, 251, 252, 253, and 254 shall achieve the following:
- (1) The VOC content of the coatings used shall not exceed 7.64 pounds per gallon coating as delivered to the applicator, excluding water,
 - (2) The catalyst shall be replaced once every twelve (12) months to ensure that the catalytic oxidizer is achieving the required overall efficiency,
 - (3) VOC emissions shall be limited to 4.7 pounds of VOC per gallon of coating and 0.89 tons per year each, after controls,

VOC Emissions shall be determined by the following equation:

$$\text{VOC Emissions (tons)} = (\sum (\text{VOC Content } i \text{ (\%)} / 100 \times \text{Coating Amount } i \text{ (tons)} \times (1 - \text{Control Efficiency } \% / 100))$$

where:

Control Efficiency % = control efficiency as demonstrated in most recent valid compliance test.

VOC Content *i* = Percent VOC content of coating *i* used

Amount *i* = Usage, in tons of the coating *i*

Compliance with these limits for ovens 250, 251, 252, 253, and 254 ensures compliance with the PSD minor limits in Condition D.1.3.

- (b) Pursuant to CP-003-9913-00014, issued October 28, 1998 and 326 IAC 8-1-5, the magnet wire enameling oven identified as 270 shall permanently reduce VOC emissions by 85% and the VOC emissions from oven 270 shall be limited to less than 6.85 pounds per hour.

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-2-8]

Pursuant to 326 IAC 8-2-8, for the wire enameling ovens identified as 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, the MAG HES-2 ovens 451 through 458, and the SICME SEL ovens 401/402, 403/404, 405/406, 407/408, the Permittee shall not allow the discharge, into the atmosphere, of VOC in excess of 1.7 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

Pursuant to 326 IAC 8-1-2(b), the enameling ovens' VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon coating solids, allowed.

This equivalency was determined by the following equation:

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

Where

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating

D= Density of VOC in coating in pounds per gallon of VOC

E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied

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

The equivalent pounds of VOC per gallon of coating solids (as applied) shall be limited to less than 2.21, when L is equal to 1.7 pounds of VOC per gallon of coating and D is equal to 7.36 pounds of VOC per gallon of coating.

Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the external thermal oxidizers shall be no less than the equivalent overall efficiency calculated by the following equation:

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

Where:

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

The overall efficiency of the external thermal oxidizers for ovens 210-213 and 220-223 shall be greater than 95.0%. The overall efficiency of the external thermal oxidizers for oven 230-238 shall be greater than 97.7%.

The overall efficiency of the thermal oxidizers for ovens 281-282, 283-284 and 285-286 shall be greater than 96.6%.

The overall efficiency of the thermal oxidizers for the SICME SEL ovens 401/402, 403/404, 405/406, and 407/408 shall be greater than 96.4%.

The overall efficiency of the thermal oxidizers for the MAG HES-2 ovens 451 through 458 shall be greater than 96.7%.

D.1.3 PSD Minor Limit [326 IAC 2-2]

-
- (a) Pursuant to CP 02-07-90-1751, issued on June 5, 1989, and as revised by T003-21713-00014, the VOC emissions from the three (3) ovens identified as 210-213, 220-223, and 230 shall each be less than 3.04 pounds per hour per oven, after controls. Compliance with this limit shall render the requirements of 326 IAC 2-2 not applicable to the modification performed in 1989.
 - (b) Pursuant to CP 003-3297-00014, issued on March 21, 1994, and CP 003-5731-00014, issued on July 9, 1996, and as revised by T003-21713-00014, the VOC emissions from the three (3) ovens identified as 281-282, 283-284, and 285-286 shall each be limited to less than 0.56 pounds per hour per oven, after controls. Compliance with this limit in combination with potential emissions from ovens 551, 552, 553, 561, 562, 563, 564, 565, 566, and 567, shall render the requirements of 326 IAC 2-2 not applicable to the modifications performed in 1994, 1995 and 1996.
 - (c) The total VOC emissions from the eight (8) MAG HES-2 ovens identified as ovens 451 through 458, and the four (4) SICME SEL ovens 401/402, 403/404, 405/406, and 407/408 shall be limited to 126.1 tons per twelve (12) consecutive month period, after controls. Compliance with this limit, in conjunction with potential emissions from all other emissions units at this source shall ensure that the source-wide VOC potential to emit remains below 250 tons per twelve (12) consecutive month period, rendering the requirements of 326 IAC 2-2 not applicable.

D.1.4 Hazardous Air Pollutants (HAP) Minor Limits [40 CFR 63, Subpart M]

- (a) For the emissions units identified as 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 551, 552, 553, 561, 562, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254, 270, 540, 541, 542, 543, 544, 550, XR-1, MAG HES-2 ovens 451 through 458, and SICME SEL ovens 401/402, 403/404, 404/405, and 407/408 the total usage of coatings, solvents, lubricants and cleanup solvents shall be limited such that the single Hazardous Air Pollutant (HAP) emissions shall be limited to less than nine (9) tons per twelve (12) consecutive month period for each HAP, with compliance determined at the end of each month.
- (b) For the emissions units identified as 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 551, 552, 553, 561, 562, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254, 270, 540, 541, 542, 543, 544, 550, XR-1, MAG HES-2 ovens 451 through 458, and SICME SEL ovens 401/402, 403/404, 404/405, and 407/408 the total usage of coatings, solvents, lubricants and cleanup solvents shall be limited such that the combined Hazardous Air Pollutant (HAP) emissions shall be limited to less than twenty-four (24) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

These limits, in conjunction with the potential to emit of a single HAP and a combination of HAPs from the boilers and insignificant activities at the source, shall limit the source-wide emissions of any single HAP to less than ten (10) tons per year and any combination of HAPs to less than twenty-five (25) tons per year. Compliance with these limits shall make the source an area source and shall render the requirements of 40 CFR 63, Subpart M, not applicable.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-5]

- (a) Pursuant to CP-003-9913-00014, issued October 28, 1998, 326 IAC 8-1-2(a), and 326 IAC 8-1-5, the Permittee shall operate the catalytic oxidizers on wire enameling ovens 247, 248, 250, 251, 252, 253, and 254 to achieve compliance with Condition D.1.1(a).
- (b) Pursuant to CP-003-9913-00014, issued October 28, 1998, 326 IAC 8-1-2(a), and 326 IAC 8-1-5, the Permittee shall operate the thermal oxidizer on wire enameling oven 270 to achieve compliance with Condition D.1.1(b).
- (c) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the external thermal oxidizers on wire enameling ovens 210-213, 220-223, and 230-238 to achieve compliance with Condition D.1.2.
- (d) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizers on wire enameling ovens 281-282, 283-284 and 285-286 to achieve compliance with Conditions D.1.2.
- (e) Pursuant to 326 IAC 8-2-8, the Permittee shall operate the thermal oxidizers on the MAG HES-2 ovens 451 through 458, and SICME SEL ovens 401/402, 403/404, 404/405, and 407/408 in order to achieve compliance with Condition D.1.2.

D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee shall conduct performance tests to verify VOC control efficiency as shown below. If the representative oven that is required to be tested has not been in operation for at least six (6) months prior to the test deadline, another similar oven in the same group of ovens shall be tested. If none of the ovens in a particular test group has been in operation for at least six (6) months prior to the test deadline, then the Permittee is not required to conduct testing for that group. However, upon startup of any oven in a test group that has not been in operation for at least six

- (6) months prior to the test deadline, the Permittee shall conduct a performance test to verify VOC and/or HAP control efficiency within ninety (90) days of startup of that oven.
- (a) In order to demonstrate compliance with Conditions D.1.2 and D.1.3(a), the Permittee shall conduct a performance test to verify the VOC control efficiency for the external thermal oxidizers for ovens 210-213, 220-223, and 230-238 using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed within one (1) year of the issuance of this permit. One representative oven shall be tested for VOC emissions. Testing shall be performed such that no single oven is tested twice in a fifteen (15) year cycle. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (b) In order to demonstrate compliance with Conditions D.1.2 and D.1.3(c), the Permittee shall conduct a performance test to verify the VOC control efficiency for the thermal oxidizers for ovens 281-282, 283-284 and 285-286 using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed by July 19, 2010. One representative oven shall be tested for VOC emissions. Testing shall be performed such that no single oven is tested twice in a fifteen (15) year cycle. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (c) In order to demonstrate compliance with Conditions D.1.1(a) and D.1.3(b), the Permittee shall conduct a performance test to verify the VOC control efficiency for the catalytic oxidizers for ovens 247, 248, 250, 251, 252, 253, and 254 using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed by July 18, 2010. Two (2) representative ovens shall be tested for VOC emissions. The test shall be done within the last 2 months of the life of the catalyst. Testing shall be performed such that no single oven is tested twice in a fifteen (15) year cycle. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (d) In order to demonstrate compliance with Condition D.1.1(b), the Permittee shall conduct a performance test to verify the VOC control efficiency for the thermal oxidizer for oven 270 using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed by July 19, 2010. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (e) No later than 180 days after the installation of any one (1) of the eight (8) MAG HES-2 ovens, identified as ovens 451 through 458, in order to demonstrate compliance with Conditions D.1.2 and D.1.3(c), the Permittee shall conduct a performance test to verify the VOC control efficiency using methods approved by the Commissioner. One representative oven shall be tested for VOC emissions. Testing shall be performed such that no single oven is tested twice in a fifteen (15) year cycle. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.
- (f) No later than 180 days after the installation of any one (1) of the four (4) SICME SEL ovens, identified as ovens 401/402, 403/404, 405/406, and 407/408, in order to demonstrate compliance with Conditions D.1.2 and D.1.3(c), the Permittee shall conduct a performance test to verify the VOC control efficiency using methods approved by the Commissioner. One representative oven shall be tested for VOC emissions. Testing shall be performed such that no single oven is tested twice in a fifteen (15) year cycle. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.
- (g) HAP Testing Requirements:
- As long as the total VOC emissions from the magnet wire ovens at this source remain below nine (9) tons in any twelve (12) consecutive month period, no HAP testing is

required.

In order to demonstrate compliance with Condition D.1.4, the Permittee shall perform overall control efficiency of VOC testing on one oven from each of the following seven (7) oven groups (210-213, 220-223, 230-237, and XR-1), (281-282, 283-284, and 285-286), (551, 552, 553, 561, 562, 563, 564, 565, 566, and 567), (243, 244, 245, 246, 247, 248, 250, 251, 252, 253, and 254), (270), (451 through 458), and (401/402, 403/404, 405/406, 407/408) using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6, using methods determined by the Commissioner to be appropriate for each different oven design. The tests shall be performed within one (1) year of the issuance of this permit, or within five (5) years of the last valid test performed on each of these oven groups, whichever is later. The coating(s) tested shall be the wire coating used in each of these oven groups that has the lowest overall HAP destruction efficiency, as estimated by the manufacturer and approved by IDEM. This testing shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. Total VOC emissions for all ovens at this source shall be calculated each month using the following equation for VOC emissions:

$$\text{Total VOC emissions} = \sum_j [\sum_i (\text{VOC Content}_i (\%) / 100 \times \text{Coating Amount}_i)] \times (1.0 - \% \text{VOC control efficiency}_j / 100) + \sum_k (\text{uncontrolled VOC input}_k)$$

where:

j = each individual oven

i = each coating used in an oven

k = each solvent used in an oven whose VOC emissions are uncontrolled

The most recent VOC stack test results for each oven group shall be used in determining the specific VOC control efficiency for the ovens in that oven group in the equation above. A running twelve (12) month total of VOC emissions shall be calculated by adding the total volatile organic compound emitted for the previous month to the previous 11 months total VOC emitted so as to arrive at total VOC emissions for a 12 consecutive months period.

In the event that total VOC emissions from all of the magnet wire coating ovens at this source exceeds nine (9) tons in any twelve consecutive month period, then the source shall test for individual HAP emissions from the ovens within 180 days of the notification to IDEM reporting this discovery.

The Permittee shall perform overall control efficiency of HAP testing on one oven from each of the following seven (7) oven groups (210-213, 220-223, 230-237, and XR-1), (281-282, 283-284, and 285-286), (551, 552, 553, 561, 562, 563, 564, 565, 566, and 567), (243, 244, 245, 246, 247, 248, 250, 251, 252, 253, and 254), (270), (451 through 458), and (401/402, 403/404, 405/406, 407/408) using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6, using methods determined by the Commissioner to be appropriate for each different oven design. The coating(s) tested shall be the wire coating used in each of these oven groups that has the lowest overall HAP destruction efficiency, as estimated by the manufacturer and approved by IDEM. This testing shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. Single HAP and total HAP emissions for all ovens at this source shall be calculated each month using the following equation for HAP emissions:

$$\text{Single HAP emissions} = \sum_j [\sum_i (\text{single HAP Content}_i (\%) / 100 \times \text{Coating Amount}_i)] \times (1.0 - \% \text{HAP control efficiency}_j / 100) + \sum_k (\text{uncontrolled HAP input}_k)$$

$$\text{Total HAP emissions} = \sum_j [\sum_i (\text{total HAP Content}_i (\%) / 100 \times \text{Coating Amount}_i)] \times (1.0 - \% \text{ HAP control efficiency}_j / 100) + \sum_k (\text{uncontrolled HAP input}_k)$$

where:

j = each individual oven

i = each coating used in an oven

k = each solvent used in an oven whose HAP emissions are uncontrolled

The most recent HAP stack test results for each oven group shall be used in determining the specific HAP control efficiency for the ovens in that oven group in the equation above. A running twelve (12) month total of single HAP and total HAP emissions shall be calculated by adding the single HAP and total HAP emitted for the previous month to the previous 11 months single HAP and total HAP emitted so as to arrive at single HAP and total HAP emissions for a 12 consecutive months period.

- (f) For a higher VOC and/or HAP content coating than that used during the stack tests in (a) – (e) above, the following procedure shall be followed:
- (1) Calculate the new minimum required control efficiency for the new coating (E_{new});
 - (2) Calculate the new maximum HAP loading (L_{new}) for the higher HAP content enamel;
 - (3) Calculate the current maximum HAP loading (L_{current});
 - (4) If E_{new} is lower than the last stack test control efficiency, and L_{new} is lower than L_{current} , Permittee shall be allowed to use the same destruction efficiency for calculations for the higher HAP content enamel.
- (g) Before using a coating that would lead to a higher VOC and/or HAP loading in pounds per hour than what was used during the stack test required in paragraphs (a) through (e) above, the Permittee shall conduct a performance test to verify VOC and/or HAP control efficiency as per Conditions D.1.1, D.1.2, D.1.3, and D.1.4 for the catalytic/thermal oxidizers using methods approved by the Commissioner.
- (h) In order to demonstrate compliance with Condition D.1.1(a)(3) for the twelve (12) month catalyst replacement frequency requirement in Condition D.1.1(a)(2), the Permittee shall conduct a one-time performance test to verify the VOC control efficiency for the catalytic oxidizers for ovens 243, 244, 245, or 246 using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed within one year of issuance of this permit. One (1) representative oven shall be tested for VOC emissions. The test shall be done on an oven with a catalyst that has been in use for at least twelve (12) months. This test may be done in conjunction with the VOC testing required for this oven group in Condition D.1.7(e).

D.1.8 VOC Emissions

- (a) Compliance with Condition D.1.1(a)(3) shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to the previous 11 months total VOC emitted so as to arrive at VOC emissions for 12 consecutive months period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

$$\text{Total VOC emissions} = \sum_j [\sum_i (\text{VOC Content}_i (\%) / 100 \times \text{Coating Amount}_i)] \times (1.0 - \% \text{ VOC control efficiency}_j / 100) + \sum_k (\text{uncontrolled VOC input}_k)$$

where:

j = each individual oven

i = each coating used in an oven
k = each solvent used in an oven whose VOC emissions are uncontrolled

The % VOC control efficiency for ovens 247, 248, 250, 251, 252, 253, and 254 shall be determined by testing pursuant to Condition D.1.7.

- (b) Compliance with Condition D.1.4 shall be demonstrated within 30 days of the end of each month by demonstrating that VOC emissions from ovens 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 551, 552, 553, 561, 562, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254, 270, 540, 541, 542, 543, 544, 550, and XR-1 do not exceed nine (9) tons per year. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at VOC emissions for 12 consecutive months period. The VOC emissions for a month can be arrived at using the formula in paragraph (a) above. The % VOC control efficiency for each oven group as determined by the most recent VOC stack testing pursuant to Condition D.1.7(e) for the ovens in that oven group shall be used in determining the specific VOC control efficiency for the ovens in that oven group.
- (c) In order to demonstrate compliance with Condition D.1.3(c), the total VOC emissions for the eight (8) MAG HES-2 ovens identified as 451 through 458 and the four (4) SICME SEL ovens identified as 401/402, 403/404, 405/406, and 407/408 shall be calculated each month using the following equation for VOC emissions:

$$\text{Total VOC emissions} = \sum_j [\sum_i (\text{VOC Content}_i (\%) / 100 \times \text{Coating Amount}_i)] \times (1.0 - \% \text{VOC control efficiency}_j / 100) + \sum_k (\text{uncontrolled VOC input}_k)$$

where:

j = each individual oven
i = each coating used in an oven
k = each solvent used in an oven whose VOC emissions are uncontrolled

D.1.9 Hazardous Air Pollutant (HAP) Calculations

In the event that total VOC emissions from all of the magnet wire coating ovens exceeds nine (9) tons per year as determined pursuant to Condition D.1.8, the Permittee shall demonstrate compliance with the HAP emission limitation in Condition D.1.4, by determining the HAP emissions for each month for the emissions units identified as 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 551, 552, 553, 561, 562, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254, 270, 540, 541, 542, 543, 544, 550, XR-1, 451 through 458, 401/402, 403/404, 405/406, and 407/408.

For ovens 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 551, 552, 553, 561, 562, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254, 270, XR-1, 451 through 458, 401/402, 403/404, 405/406, and 407/408, HAP emissions shall be determined as follows:

$$\text{HAP}_1 \text{ emissions} = [\text{HAP usage all ovens} \times (1.0 - \% \text{HAP control efficiency} / 100)]$$

For ovens 540, 541, 542, 543, 544, and 550, HAP emissions shall be determined as follows:

$$\text{HAP}_2 \text{ emissions} = (\text{HAP usage of ovens } 540, 541, 542, 543, 544, \text{ and } 550)$$

$$\text{Total HAP Emissions} = \text{HAP}_1 \text{ emissions} + \text{HAP}_2 \text{ emissions}$$

The % HAP control efficiency for each oven group shall be determined by testing per Condition D.1.7.

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

D.1.10 Thermal/Catalytic Oxidizer Operation [40 CFR 64]

- (a) From the date of issuance of Part 70 permit renewal 003-22934-00014 until the approved stack test results are available, and in order to demonstrate compliance with Conditions D.1.1, D.1.2, and D.1.3:
- (1) The Permittee shall operate the external thermal oxidizers 3 hour average temperature for ovens 210-213 and 220-223 at or above the temperature that results in the required 95.0% control efficiency, as determined during compliance tests.
 - (2) The Permittee shall operate the external thermal oxidizers 3 hour average temperature for oven 230-238 at or above the temperature that results in the required 97.7% control efficiency, as determined during compliance tests.
 - (3) The Permittee shall operate the thermal oxidizers 3 hour average temperature for ovens 281-282, 283-284 and 285-286 at or above the temperature of 1250 degrees F or the temperature determined during compliance tests to maintain a 96.6% control efficiency.
 - (4) The Permittee shall operate the catalytic oxidizers 3 hour average temperature for ovens 247, 248, 250, 251, 252, 253, and 254 at or above the temperature that results in the required 90.0% control efficiency, as determined during compliance tests.
 - (5) The Permittee shall operate the thermal oxidizer 3 hour average temperature for oven 270 at or above the temperature of 1250 degrees F or the temperature determined during compliance tests to maintain a 85.0% control efficiency.
 - (6) Until approved stack test results are available, the Permittee shall operate the thermal oxidizers' 3 hour average temperature for ovens identified as 451 through 458 at or above the temperature of 921 degrees F or the temperature determined during the latest compliant stack test to maintain 96.7% control efficiency.
 - (7) Until approved stack test results are available, the Permittee shall operate the thermal oxidizers' 3 hour average temperature for ovens identified as 401/402, 403/404, 405/406, 407/408 at or above the temperature of 1234 degrees F or the temperature determined during the latest compliant stack test to maintain 96.4% control efficiency.
- (b) From the date of issuance of the Part 70 permit until the approved stack test results are available, and in order to demonstrate compliance with Condition D.1.4, the Permittee shall operate the catalytic/thermal oxidizers 3 hour average temperature for ovens 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 551, 552, 553, 561, 562, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254, 270, and XR-1 at or above the temperature that results in the HAP (VOC) control efficiency necessary to comply with the requirements of Condition D.1.4, as demonstrated by Condition D.1.8 or D.1.9.
- (c) From the date that the approved stack test results are available, and in order to demonstrate compliance with Condition D.1.4, the Permittee shall operate the catalytic/thermal oxidizers 3 hour average temperature for ovens 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 552, 553, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254, 270, and XR-1 at or above the temperature that results in the HAP (VOC) control efficiency necessary to comply with the requirements of Condition D.1.4, as demonstrated by Condition D.1.8 or D.1.9.

- (d) From the date that the approved stack test results are available, and in order to demonstrate compliance with Condition D.1.4, the Permittee shall operate the catalytic/thermal oxidizers 3 hour average temperature for ovens 451 through 458 at or above the temperature that results in the HAP (VOC) control efficiency necessary to comply with the requirements of Condition D.1.4, as demonstrated by Condition D.1.8 or D.1.9.
- (e) From the date that the approved stack test results are available, and in order to demonstrate compliance with Condition D.1.4, the Permittee shall operate the catalytic/thermal oxidizers 3 hour average temperature for ovens 401/402, 403/404, 405/406, and 407/408 at or above the temperature that results in the HAP (VOC) control efficiency necessary to comply with the requirements of Condition D.1.4, as demonstrated by Condition D.1.8 or D.1.9.
- (f) The Permittee shall determine the 3 hour block average minimum temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1, D.1.2, D.1.3, and D.1.4, as approved by IDEM.
- (g) From the date of the approved stack test results are available, and in order to demonstrate compliance with Conditions D.1.1, D.1.2, D.1.3, and D.1.4, the Permittee shall operate the thermal/catalytic oxidizers at or above the 3 hour block average minimum temperature as observed during the compliant stack test.

D.1.11 Parametric Monitoring [40 CFR 64]

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

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

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain the following records for ovens 247, 248, 250, 251, 252, 253, 254, 270, 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 245, 246, 451 through 458, 401/402, 403/404, 405/406, and 407/408 in accordance with (1) through (4) below. Records

maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits and/or VOC emission limits established in Conditions D.1.1, D.1.2, and D.1.3.

- (1) The amount and VOC content of each coating, solvent, lubricant and cleanup solvent used in each oven on a monthly basis. Records shall include purchase orders, invoices, supplier data sheets, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total VOC usage for each month;
 - (3) The weight of VOC usage for each compliance period.
 - (4) The weight of VOCs emitted for each compliance period, based on VOC usage in the magnet wire ovens $\times (1 - \text{VOC control efficiency \%}/100) + \text{uncontrolled VOC input}$.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain the following records for ovens 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 551, 552, 561, 562, 553, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254, 270, 540, 541, 542, 543, 544, 550, XR-1, 451 through 458, 401/402, 403/404, 405/406, and 407/408 in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limits established in Condition D.1.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC and HAP content of each coating, solvent, lubricant and cleanup solvent used on a monthly basis. Records shall include purchase orders, invoices, supplier data sheets, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total VOC and HAP usage for each month;
 - (3) The weight of VOC and HAP usage for each compliance period.
 - (4) The weight of VOCs emitted for each compliance period, based on VOC usage in the magnet wire ovens $\times (1 - \text{VOC control efficiency \%}/100) + \text{uncontrolled VOC input}$.
 - (5) In the event that total VOC emissions exceeds nine (9) tons per year, as determined by condition D.1.8, the Permittee shall also maintain records of the weight of single HAPs and total HAPs emitted for each compliance period, based on HAP usage in the magnet wire ovens $\times (1 - \text{HAP control efficiency \%}/100) + \text{uncontrolled HAP input}$.
- (c) To document compliance with Condition D.1.1(a)(2), the Permittee shall maintain records of the dates that the catalysts are replaced in ovens 247, 248, 250, 251, 252, 253 and 254.
- (d) To document compliance with Condition D.1.12, the Permittee shall maintain the continuous temperature records and 3 hour average temperature records.
- (e) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.1.1(a)(3), D.1.3(c), and D.1.4 shall be submitted to the address listed in Section C -

General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) In the event that total VOC emissions exceeds nine (9) tons in any twelve (12) consecutive month period, the Permittee shall submit a quarterly summary of the HAP emissions to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported, to document compliance with Condition D.1.4. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) In the event that total VOC emissions exceeds nine (9) tons in any twelve (12) consecutive month period, the Permittee shall submit a notification to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days of discovery that the VOC emissions exceed nine (9) tons per twelve consecutive month period. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (b) One (1) 16.7 MMBtu per hour natural gas-fired boiler, identified as CB266-500, constructed in 1965, and exhausting to stack A-2.

Insignificant Activities:

- (c) One (1) 6.0 MMBtu per hour natural gas-fired boiler, identified as Bryan RV600, constructed in 2002 and exhausting to stack A-1. [326 IAC 6-2-3]

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

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

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

- (a) Pursuant to 326 IAC 6-2-3(a), (b) and (d) (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from the 16.7 MMBtu/hr natural gas-fired boiler (CB266-500) shall not exceed 0.8 lbs per MMBtu. Pursuant to 326 IAC 6-2-3(a), (b) and (d), the particulate emissions from all boilers which were in operation on June 8, 1972 shall be limited by the following equation or by 0.8 lbs per MMBtu, whichever is more stringent:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}} = \frac{50 \times 0.67 \times 42}{76.5 \times (16.7 + 16.7)^{0.75} \times 1^{0.25}} = \frac{1.32 \text{ lbs PM}}{\text{MMBtu heat input}}$$

Where:

C = max ground level concentration (= 50 Φ g/m³)

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr) = 33.6

N = number of stacks = 1

a = plume rise factor = 0.67

h = stack height (ft) = 42

The more stringent PM emission limit for this boiler is 0.8 lbs/MMBtu heat input.

- (b) Pursuant to 326 IAC 6-2-4(a), the particulate emissions from the 6.0 MMBtu/hr natural gas-fired boiler (Bryan RV600) shall be limited by 0.484 lbs/MMBtu heat input. The emission limit was calculated using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} = \frac{1.09}{(16.7 + 6.0)^{0.26}} = 0.484 \text{ lbs/MMBtu}$$

Where:

Pt = emission rate limit (lbs/MMBtu)

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

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5].

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

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

D.3.1 Cold Cleaner (Degreaser) Operations [326 IAC 8-3-2]

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

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

D.3.2 Cold Cleaner (Degreaser) Operations [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°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

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

SECTION D.4

FACILITY OPERATION CONDITIONS

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

- (b) Activities with emissions equal to or less than the following thresholds: 5 lb/hr and 25 lb/day PM10; 5 lb/hr and 25 lb/day SO₂; 5 lb/hr and 25 lb/day NO_x; 3 lb/hr and 15 lb/day VOC; 0.6 tons per year Pb; 5 lb/day and 1.0 ton/yr of a single HAP, and 12.5 lb/day and 2.5 ton/yr of any combination of HAPs, consisting of one (1) paint spray booth [326 IAC 6-3-2].

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

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

D.4.1 Particulate Emissions from Manufacturing Operations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), particulate from the insignificant paint spray booth shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Rea Magnet Wire Company, Inc.
Source Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
Part 70 Permit No.: T003-21713-00014

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Rea Magnet Wire Company, Inc.
Source Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
Part 70 Permit No.: T003-21713-00014

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Rea Magnet Wire Company, Inc.
Source Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
Part 70 Permit No.: T003-21713-00014
Facility: Ovens 247, 248, 250, 251, 252, 253, and 254
Parameter: VOC emissions
Limit: Less than 0.89 tons each, per twelve (12) consecutive month period.

YEAR:

QUARTER:

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.

Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Rea Magnet Wire Company
 Source Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
 Mailing Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
 Part 70 Permit No.: T003-21713-00014
 Facility: Ovens 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 551, 552, 553, 561, 562, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254, 270, 540, 541, 542, 543, 544, 550, XR-1, 451 through 458, 401/402, 403/404, 405/406, and 407/408
 Parameter: Single and Combination Hazardous Air Pollutants (HAPs)
 Limits: Less than nine (9) tons for each single hazardous air pollutant (HAP)
 Less than twenty-four (24) tons of combined Hazardous Air Pollutants (HAPs)
 The HAP limits shall be based on a twelve (12) consecutive month period

Quarter: _____ Year _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Rea Magnet Wire Company, Inc.
Source Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
Part 70 Permit No.: T003-21713-00014
Facility: Ovens 451-458, 401/402, 403/404, 405/406, 407/408
Parameter: VOC emissions
Limit: Less than 126.1 tons total, per twelve (12) consecutive month period.

YEAR:

QUARTER:

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.

Deviation has been reported on:

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Rea Magnet Wire Company, Inc.
Source Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
Part 70 Permit No.: T003-21713-00014

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

**Technical Support Document (TSD) for a
Part 70 Minor Source Modification and
a Part 70 Significant Permit Modification**

Source Description and Location

Source Name:	Rea Magnet Wire Company, Inc.
Source Location:	3600 East Pontiac Street, Fort Wayne, Indiana 46803
County:	Allen
SIC Code:	3357
Operation Permit No. (1st Renewal):	T003-21713-00014
Operation Permit Issuance Date:	December 31, 2007
Minor Source Modification No.:	003-26729-00014
Significant Permit Modification No.:	003-26728-00014
Permit Reviewer:	Madhurima D. Moulik

Existing Approvals

The source was issued Part 70 Operating Permit (First Renewal) No. T003-21713-00014 on December 31, 2007.

County Attainment Status

The source is located in Allen County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective February 12, 2007, for the Fort Wayne area, including Allen County, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

Note: On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8 hour ozone standard.

- (a) 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. Allen 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 – Entire Source section.

- (b) Allen County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules is July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.
- (c) Allen County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) 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.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits:

Process/emission unit	Potential To Emit (tons per year)					
	PM	PM-10	SO ₂	VOC	CO	NO _x
All Magnet Wire Ovens	0	0	0	123	0	0
Oven Burners	0.12	0.49	0.04	0.35	5.41	6.44
Boiler CB266-500	0.14	0.55	0.04	0.39	6.02	7.17
Boiler Bryan RV600	0.05	0.20	0.02	0.14	2.16	2.58
Total PTE	0.31	1.23	0.10	123.9	13.6	16.2

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon the Technical Support Document for Part 70 (First Renewal) No. T003-21713-00014.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAPs	Potential To Emit (ton/yr)
Individual HAP	Less than 10
Total	Less than 25

This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM10	0
PM2.5	0
SO ₂	0
VOC	42
CO	5
NO _x	5
HAP	Not reported

Description of the Proposed Modification

The Office of Air Quality (OAQ) has reviewed a construction application, submitted by Rea Magnet Wire Company on July 8, 2008, relating to the installation of four (4) SICME SEL ovens and eight (8) MAG HES-2 ovens. The following is a list of the proposed emission units and pollution control devices:

- (a) Eight (8) MAG HES-2 electric wire enameling ovens with internal thermal oxidizers, identified as emission units 451, 452, 453, 454, 455, 456, 457, and 458, to be installed in 2008, with a maximum capacity of 93.0 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.006 gallons per unit, with emissions exhausting to stacks C-21, C-22, C-23, C-24, C-25, C-26, C-27, and C-28 respectively.
- (b) Four (4) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 401/402, 403/404, 405/406, 407/408, to be installed in 2008, with a maximum capacity of 35.3 units per hour each, and maximum enamel usage (including base coat, top coat, and Elantas bondable enamel) of 0.0196 gallons per unit, with emissions exhausting to stacks D-20, D-21, D-22, D-23, respectively.

"Integral Part of the Process" Determination

The company submitted the following justification such that the VOC internal thermal oxidizers for the proposed ovens be considered as an integral part of the wire coating process:

- (a) The VOCs will be oxidized using only the process heat supplied by the curing ovens.
- (b) The processes could not operate without the oxidizers, because the oxidizers supply the heat needed for curing the wire coating.
- (c) The oxidizers serve a primary purpose other than pollution control. The oxidizers supply the heat needed for curing the wire coating.

IDEM, OAQ has re-evaluated the justifications and while the oxidation system meets some of the criteria for this determination, the control efficiency of the oxidizers is dependent on temperature.

Therefore, the oxidation system will not be considered integral to the process and the permitting level will be determined using the potential to emit before controls. Operating conditions in the proposed permit will specify that the oxidizers shall operate at all times that the wire coating process is in operation.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Stack Summary

The following table summarizes the stacks that correspond to the new emission units.

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
C-21	Oven 451	63	0.29	49	590
C-22	Oven 452	63	0.29	49	590
C-23	Oven 453	63	0.29	49	590
C-24	Oven 454	63	0.29	49	590
C-25	Oven 455	63	0.29	49	590
C-26	Oven 456	63	0.29	49	590
C-27	Oven 457	63	0.29	49	590
C-28	Oven 458	63	0.29	49	590
D-20	Oven 401/402	63	0.33	54	600
D-21	Oven 403/404	63	0.33	54	600
D-22	Oven 405/406	63	0.33	54	600
D-23	Oven 407/408	63	0.33	54	600

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE of the modification before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (ton/yr)
PM	Negligible
PM ₁₀	Negligible
SO ₂	Negligible

Pollutant	Potential To Emit (ton/yr)
VOC	197.53
CO	Negligible
NO _x	Negligible

HAPs	Potential To Emit (ton/yr)
Single	Greater than 10
TOTAL	Greater than 25

This source modification is subject to 326 IAC 2-7-10.5(d)(8) which states that a minor source modification is appropriate for "a modification that has a potential to emit greater than the thresholds under subdivision 3 that adds an emissions unit or units of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit or units, except if the modification would result in a potential to emit greater than the thresholds in 326 IAC 2-2 or 326 IAC 2-3". Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d) because pursuant to 326 IAC 2-7-12(b)(1)(C)(i) a minor permit modification is not appropriate for a modification that requires a "case-by-case determination of an emission limitation or standard". The Permittee has requested that a PSD minor limit on VOC emissions from the proposed ovens be added in order to maintain PSD minor status for the entire source, therefore a significant permit modification will be issued.

Permit Level Determination – PSD or Emission Offset

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential to Emit (tons per year)
Process / Emission Unit	VOC*
MAG HES-2 ovens 451-458	126.0
SICME SEL ovens 401/402, 403/404, 405/406, 407/408	
Total for Modification	126.0
Significant Level	250

* The Permittee has requested a combined limit of 126.0 tons per year of VOC for all ovens included in this modification. Compliance with this limit, in conjunction with the potential to emit of VOC of all existing units at the source shall ensure that the total source potential to emit of VOC is below 250 tons per year, maintaining the PSD minor status for this source.

This modification to an existing minor stationary source is not major because the emissions increase is less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) The new magnet wire coating ovens 401/402, 403/404, 405/406, 407/408, and 451 through 458 are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Metal Parts and Products Surface Coating Operations, Subpart M MMM since the source-wide single and combined HAP emissions (from the new and existing ovens) are limited to less than 10 and less than 25 tons per twelve (12) consecutive months, respectively.
- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) have a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) are subject to an emission limitation or standard for that pollutant; and
 - (3) use a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

Emission Unit	Control Device Used	Emission Limitation (VOC) (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Each of ovens 401/402, 403/404, 405/406, 407/408	Thermal Oxidizer	Y	18.66	0.23	100	N	N
Each of ovens 451 through 458	Thermal Oxidizer	Y	15.36	0.28	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM requirements are not applicable to any of the new units as part of this modification.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-2 and 2-3 (PSD and Emission Offset)

PSD and Emission Offset applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

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

The operation of the proposed MAG HES-2 and SICME SEL ovens will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 8-2-8 (Magnet Wire Coating Operations)

The four (4) SICME SEL ovens 401/402, 403/404, 405/406, 407/408, and the eight (8) MAG HES-2 ovens, identified as 451 through 458, to be constructed after 1990, will have estimated VOC actual emissions of greater than 15 pounds per day each before add-on controls. Therefore, pursuant to 326 IAC 8-2-1(a)(4), these ovens are subject to 326 IAC 8-2-8 (Magnet Wire Coating Operations).

Pursuant to 326 IAC 8-2-8, the Permittee shall not allow the discharge into the atmosphere of any volatile organic compounds (VOCs) in excess of 1.7 pounds per gallon of coating, less water, delivered to the applicator from magnet wire coating ovens, identified as ovens 401/402, 403/404, 405/406, 407/408, and ovens 451 through 458.

- (a) For ovens 401/402, 403/404, 405/406, 407/408, and ovens 451 through 458, compliance with the VOC content and emission limitation shall be determined pursuant to 326 IAC 8-1-2(b), using formulation data supplied by the coating manufacturer.

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$
$$= 1.7 / (1 - (1.7/7.36)) = 2.21 \text{ lb VOC/gal coating solids}$$

Where:

- L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating less water;
- D= Baseline solvent density of VOC in the coating and shall be equal to seven and thirty-six hundredths (7.36) pounds of VOC per gallon of solvent;
- E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the add-on thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

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

For the MAG HES-2 ovens 451 through 458, minimum destruction efficiency required:

$$= \frac{67.73 - 2.21}{67.73} \times 100$$
$$= 96.7\%$$

Where:

- V = The actual VOC content of the coating or, as applied to the subject coating line as determined by the applicable test methods and procedures specified in section 4 of this rule in units of pounds of VOC per gallon of coating solids as applied = 67.73 lb/gal solids (worst case)
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied = 2.21 lbs VOC per gal coating solids

O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiencies of the thermal oxidizers for ovens 451 through 458 need to be equal to or greater than 96.7% in order to comply with 326 IAC 8-2-8.

Ovens 451 through 458, to be controlled by internal thermal oxidizers with estimated control efficiencies of 98.5%, can comply with the requirement under 326 IAC 8-2-8.

For the SICME SEL ovens 401/402, 403/404, 405/406, 407/408, the minimum destruction efficiency required:

$$= \frac{61.53 - 2.21}{61.53} \times 100$$
$$= 96.4 \%$$

Where:

V = The actual VOC content of the coating or, as applied to the subject coating line as determined by the applicable test methods and procedures specified in section 4 of this rule in units of pounds of VOC per gallon of coating solids as applied = 61.53 lb/gal solids (worst case)

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied = 2.21 lbs VOC per gal coating solids

O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiencies of the thermal oxidizers for ovens 401/402, 403/404, 405/406, 407/408 needs to be equal to or greater than 96.4% in order to comply with 326 IAC 8-2-8.

Ovens 401/402, 403/404, 405/406, 407/408, to be controlled by internal thermal oxidizers with estimated control efficiencies of 98.5%, can comply with the requirement under 326 IAC 8-2-8.

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

The proposed ovens 401/402, 403/404, 405/406, 407/408, and 451 through 458 are surface coating facilities. The surface coating materials are applied to the wire with flow application methods. Pursuant to 326 IAC 6-3-1(b)(7), these ovens are exempt from 326 IAC 6-3-2.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The Compliance Determination Requirements applicable to this modification are as follows:

(a) Testing Requirements:

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing	Limit or Requirement
MAG HES-2 ovens	Internal Thermal Oxidizer	Within 180 of installation	VOC	once every 5 years	PSD and 326 IAC 8-2-8
SICME SEL ovens	Internal Thermal Oxidizer	Within 180 days of installation	VOC	once every 5 years	PSD and 326 IAC 8-2-8

(b) In order to demonstrate compliance with the emission limitations under 326 IAC 8-2-8, and in order to ensure compliance with the PSD minor limitation under Condition D.1.3(c), the Permittee shall operate the thermal oxidizers on the MAG HES2 ovens 451 through 458 and the SICME SEL ovens 401/402, 403/404, 405/406, and 407/408.

(c) In order to demonstrate compliance with Condition D.1.3(c), the total VOC emissions for the eight (8) MAG HES-2 ovens identified as 451 through 458 and the four (4) SICME SEL ovens identified as 401/402, 403/404, 405/406, and 407/408 shall be calculated each month using the following equation for VOC emissions:

$$\text{Total VOC emissions} = \sum_j [\sum_i (\text{VOC Content}_i (\%) / 100 \times \text{Coating Amount}_i)] \times (1.0 - \% \text{VOC control efficiency}_j / 100) + \sum_k (\text{uncontrolled VOC input}_k)$$

where:

j = each individual oven

i = each coating used in an oven

k = each solvent used in an oven whose VOC emissions are uncontrolled

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

(a) Until approved stack test results are available, the Permittee shall operate the thermal oxidizers' 3 hour average temperature for ovens identified as 451 through 458 at or above the temperature of 921 degrees F or the temperature determined during the latest compliant stack test to maintain 96.7% control efficiency.

(b) Until approved stack test results are available, the Permittee shall operate the thermal oxidizers' 3 hour average temperature for ovens identified as 401/402, 403/404, 405/406, 407/408 at or above the temperature of 1234 degrees F or the temperature determined during the latest compliant stack test to maintain 96.4% control efficiency.

(c) From the date that the approved stack test results are available, and in order to demonstrate compliance with Condition D.1.4, the Permittee shall operate the thermal oxidizers 3 hour average temperature for ovens 451 through 458 at or above the temperature that results in the HAP (VOC) control efficiency necessary to comply with the requirements of Condition D.1.4, as demonstrated by Condition D.1.8 or D.1.9.

- (d) From the date that the approved stack test results are available, and in order to demonstrate compliance with Condition D.1.4, the Permittee shall operate the thermal oxidizers 3 hour average temperature for ovens 401/402, 403/404, 405/406, and 407/408 at or above the temperature that results in the HAP (VOC) control efficiency necessary to comply with the requirements of Condition D.1.4, as demonstrated by Condition D.1.8 or D.1.9.

These monitoring conditions are necessary because the thermal oxidizers for controlling VOC emissions from the proposed MAG HES-2 and SICME SEL ovens must operate properly and maintain the required minimum temperatures (and VOC and HAP destruction efficiencies) to ensure compliance with 326 IAC 8-2-8, PSD minor status for the entire source under 326 IAC 2-2 and the HAP minor status for the entire source.

Proposed Changes

The changes listed below have been made to Part 70 (First Renewal) Operating Permit No. T003-21713-00014. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

1. The proposed SICME SEL and MAG HES-2 ovens (ovens 401/402, 403/404, 405/406, 407/408, and 451 through 458) have been added to Sections A.2 and the facility description box in Section D.1.
2. The minimum VOC control efficiency requirements for MAG HES-2 ovens 451 through 458 and SICME SEL ovens 401/402, 403/404, 405/406, and 407/408 under 326 IAC 8-2-8 have been added to Condition D.1.2. The details of the requirement have been combined for all ovens subject to 326 IAC 8-2-8 in order to avoid duplication. Therefore D.1.2(b) has been deleted.
3. Condition D.1.3 - PSD Minor limit has been modified to add the PSD minor limitation for the MAG HES-2 ovens 451 through 458, and SICME SEL ovens 401/402, 403/404, 405/406, and 407/408.
4. Condition D.1.4 - Hazardous Air Pollutants (HAP) Minor Limits [40 CFR 63, Subpart M] has been modified in order to include the HAP emissions from the eight (8) MAG HES-2 and four (4) SICME SEL ovens under the source-wide HAP minor limit.
5. Condition D.1.6 - Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-5] has been modified to incorporate the requirement to operate the internal thermal oxidizers at all times that the corresponding ovens 401/402, 403/404, 405/406, 407/408, and 451 through 458 are in operation.
6. Condition D.1.7 - Testing Requirements has been modified to add the testing requirements for the proposed ovens 401/402, 403/404, 405/406, 407/408, and 451 through 458.
7. Condition D.1.8 - VOC Emissions has been modified to include the methodology for demonstrating compliance with the PSD minor limitation for ovens 401/402, 403/404, 405/406, 407/408, and 451 through 458.
8. Condition D.1.9 - Hazardous Air Pollutant (HAP) Calculations has been modified to include the proposed ovens 401/402, 403/404, 405/406, 407/408, and 451 through 458.
9. Condition D.1.10 - Thermal/Catalytic Oxidizer Operation has been modified to incorporate the minimum temperature requirements for the proposed ovens 401/402, 403/404, 405/406, 407/408, and 451 through 458.

10. Conditions D.1.12 - Record Keeping Requirements and D.1.13 - Reporting Requirements have been modified to incorporate the recordkeeping and reporting requirements for the proposed ovens 401/402, 403/404, 405/406, 407/408, and 451 through 458.
11. The Quarterly Report form for the single and combination of HAPs limitations has been revised to include the HAP emissions from the proposed MAG HES-2 (451 through 458) and SICME SEL (401/402, 403/404, 405/406, 407/408) ovens.
12. A Quarterly Report form has been added for the PSD minor limitation for the MAG HES-2 and SICME SEL ovens.

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

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

- (a) The following magnet wire enameling ovens:

Model	Oven ID #	Construction Date	Max. Rating (lbs wire/hr)	VOC Oxidizer Type	Stack ID #
Rea	540	Prior to 1965	0.26	None	C-2
Rea	541	Prior to 1965	0.26	None	C-2
Rea	542	Prior to 1965	0.26	None	C-2
Rea	543	Prior to 1965	0.26	None	C-2
Rea	544	Prior to 1965	0.26	None	C-2
Rea	550	Prior to 1965	0.26	None	C-1
MOCO	270	Prior to 1974	571	External thermal	D-2
MOCO	XR-1	Prior to 1980	11	External thermal	E-3
Rea H-9	243	June 1987	6	External catalytic	F-6
Rea H-9	244	May 1987	6	External catalytic	F-6
Rea H-9	245	June 1989	6	External catalytic	F-6
Rea H-9	246	June 1989	6	External catalytic	F-6
GE-I	210-213	June 1989	191	External thermal	F-1
GE-I	220-223	June 1989	191	External thermal	F-2
GE-M	230-238	June 1989	508	External thermal	F-3
Rea H-9	247	Feb. 1992	6	External catalytic	F-7
Rea H-9	248	Feb. 1992	6	External catalytic	F-7
MAG HS0	551	Nov. 1994	0.64	Internal catalytic	C-3
MAG HS0	552	Nov. 1994	0.64	Internal catalytic	C-4
MAG HS0	553	Nov. 1994	0.64	Internal catalytic	C-5
MAG HS1	561	Nov. 1994	0.91	Internal catalytic	C-6
MAG HS1	562	Nov. 1994	0.91	Internal catalytic	C-8
MAG HS1	563	Nov. 1994	0.91	Internal catalytic	C-10
MAG HS1	564	Nov. 1994	0.91	Internal catalytic	C-12
MAG HS1	565	Nov. 1994	0.91	Internal catalytic	C-14
MAG HS1	566	Nov. 1994	0.91	Internal catalytic	C-16
MAG HS1	567	Nov. 1994	0.91	Internal catalytic	C-18
Rea H-9	250	1995	6	External catalytic	F-7
Rea H-9	251	1995	6	External catalytic	F-8
Rea H-9	252	1995	6	External catalytic	F-8
Rea H-9	253	1995	6	External catalytic	F-8
Rea H-9	254	1995	6	External catalytic	F-7
SICME	281-282	1996	183	Internal thermal	D-3
SICME	283-284	1996	183	Internal thermal	D-4
SICME	285-286	1996	183	Internal thermal	D-5
MAG HES-2	451	2008	18.9	Internal thermal	C-21
MAG HES-2	452	2008	18.9	Internal thermal	C-22
MAG HES-2	453	2008	18.9	Internal thermal	C-23
MAG HES-2	454	2008	18.9	Internal thermal	C-24

Model	Oven ID #	Construction Date	Max. Rating (lbs wire/hr)	VOC Oxidizer Type	Stack ID #
MAG HES-2	455	2008	18.9	Internal thermal	C-25
MAG HES-2	456	2008	18.9	Internal thermal	C-26
MAG HES-2	457	2008	18.9	Internal thermal	C-27
MAG HES-2	458	2008	18.9	Internal thermal	C-28
SICME SEL	401/402	2008	34.4	Internal thermal	D-20
SICME SEL	403/404	2008	34.4	Internal thermal	D-21
SICME SEL	405/406	2008	34.4	Internal thermal	D-22
SICME SEL	407/408	2008	34.4	Internal thermal	D-23

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Magnet Wire Coating Ovens

(a) The following magnet wire enameling ovens:

Model	Oven ID #	Construction Date	Max. Rating (lbs wire/hr)	VOC Oxidizer Type	Stack ID #
Rea	540	Prior to 1965	0.26	None	C-2
Rea	541	Prior to 1965	0.26	None	C-2
Rea	542	Prior to 1965	0.26	None	C-2
Rea	543	Prior to 1965	0.26	None	C-2
Rea	544	Prior to 1965	0.26	None	C-2
Rea	550	Prior to 1965	0.26	None	C-1
MOCO	270	Prior to 1974	571	External thermal	D-2
MOCO	XR-1	Prior to 1980	11	External thermal	E-3
Rea H-9	243	June 1987	6	External catalytic	F-6
Rea H-9	244	May 1987	6	External catalytic	F-6
Rea H-9	245	June 1989	6	External catalytic	F-6
Rea H-9	246	June 1989	6	External catalytic	F-6
GE-I	210-213	June 1989	191	External thermal	F-1
GE-I	220-223	June 1989	191	External thermal	F-2
GE-M	230-238	June 1989	508	External thermal	F-3
Rea H-9	247	Feb. 1992	6	External catalytic	F-7
Rea H-9	248	Feb. 1992	6	External catalytic	F-7
MAG HS0	551	Nov. 1994	0.64	Internal catalytic	C-3
MAG HS0	552	Nov. 1994	0.64	Internal catalytic	C-4
MAG HS0	553	Nov. 1994	0.64	Internal catalytic	C-5
MAG HS1	561	Nov. 1994	0.91	Internal catalytic	C-6
MAG HS1	562	Nov. 1994	0.91	Internal catalytic	C-8
MAG HS1	563	Nov. 1994	0.91	Internal catalytic	C-10
MAG HS1	564	Nov. 1994	0.91	Internal catalytic	C-12
MAG HS1	565	Nov. 1994	0.91	Internal catalytic	C-14
MAG HS1	566	Nov. 1994	0.91	Internal catalytic	C-16
MAG HS1	567	Nov. 1994	0.91	Internal catalytic	C-18
Rea H-9	250	1995	6	External catalytic	F-7
Rea H-9	251	1995	6	External catalytic	F-8
Rea H-9	252	1995	6	External catalytic	F-8
Rea H-9	253	1995	6	External catalytic	F-8
Rea H-9	254	1995	6	External catalytic	F-7
SICME	281-282	1996	183	Internal thermal	D-3
SICME	283-284	1996	183	Internal thermal	D-4
SICME	285-286	1996	183	Internal thermal	D-5
MAG HES-2	451	2008	18.9	Internal thermal	C-21
MAG HES-2	452	2008	18.9	Internal thermal	C-22

Facility Description [326 IAC 2-7-5(15)]: Magnet Wire Coating Ovens

(a) The following magnet wire enameling ovens:

MAG HES-2	453	2008	18.9	Internal thermal	C-23
MAG HES-2	454	2008	18.9	Internal thermal	C-24
MAG HES-2	455	2008	18.9	Internal thermal	C-25
MAG HES-2	456	2008	18.9	Internal thermal	C-26
MAG HES-2	457	2008	18.9	Internal thermal	C-27
MAG HES-2	458	2008	18.9	Internal thermal	C-28
SICME SEL	401/402	2008	34.4	Internal thermal	D-20
SICME SEL	403/404	2008	34.4	Internal thermal	D-21
SICME SEL	405/406	2008	34.4	Internal thermal	D-22
SICME SEL	407/408	2008	34.4	Internal thermal	D-23

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

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-2-8]

(a) Pursuant to 326 IAC 8-2-8, for the wire enameling ovens identified as 210-213, 220-223, and 230-238, **281-282, 283-284 and 285-286, the MAG HES-2 ovens 451 through 458, and the SICME SEL ovens 401/402, 403/404, 405/406, 407/408**, the Permittee shall not allow the discharge, into the atmosphere, of VOC in excess of 1.7 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

Pursuant to 326 IAC 8-1-2(b), the enameling ovens' VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon coating solids, allowed.

This equivalency was determined by the following equation:

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

Where

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

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

The equivalent pounds of VOC per gallon of coating solids (as applied) shall be limited to less than 2.21, when L is equal to 1.7 pounds of VOC per gallon of coating and D is equal to 7.36 pounds of VOC per gallon of coating.

Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the external thermal oxidizers shall be no less than the equivalent overall efficiency calculated by the following equation:

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

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the

subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.

- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the external thermal oxidizers for ovens 210-213 and 220-223 shall be greater than 95.0%. The overall efficiency of the external thermal oxidizers for oven 230-238 shall be greater than 97.7%.

The overall efficiency of the thermal oxidizers for ovens 281-282, 283-284 and 285-286 shall be greater than 96.6%.

The overall efficiency of the thermal oxidizers for the SICME SEL ovens 401/402, 403/404, 405/406, and 407/408 shall be greater than 96.4%.

The overall efficiency of the thermal oxidizers for the MAG HES-2 ovens 451 through 458 shall be greater than 96.7%.

- ~~(b) Pursuant to 326 IAC 8-2-8, for the wire enameling ovens identified as 281-282, 283-284 and 285-286, the Permittee shall not allow the discharge, into the atmosphere, of VOC in excess of 1.7 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.~~

~~Pursuant to 326 IAC 8-1-2 (b), the enameling ovens' VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon coating solids, allowed.~~

~~This equivalency was determined by the following equation:~~

$$E = \frac{L}{1 - (L/D)}$$

~~Where~~

~~L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating~~

~~D = Density of VOC in coating in pounds per gallon of VOC~~

~~E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied~~

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

~~The equivalent pounds of VOC per gallon of coating solids (as applied) shall be limited to less than 2.21, when L is equal to 1.7 pounds of VOC per gallon of coating and D is equal to 7.36 pounds of VOC per gallon of coating.~~

~~Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:~~

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

~~Where:~~

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

~~The overall efficiency of the thermal oxidizers for ovens 281-282, 283-284 and 285-286 shall be greater than 96.6%.~~

D.1.3 PSD Minor Limit [326 IAC 2-2]

- (a) Pursuant to CP 02-07-90-1751, issued on June 5, 1989, and as revised by T003-21713-00014, the VOC emissions from the three (3) ovens identified as 210-213, 220-223, and 230 shall each be less than 3.04 pounds per hour per oven, after controls. Compliance with this limit shall render the requirements of 326 IAC 2-2 not applicable to the modification performed in 1989.
- (b) Pursuant to CP 003-3297-00014, issued on March 21, 1994, and CP 003-5731-00014, issued on July 9, 1996, and as revised by T003-21713-00014, the VOC emissions from the three (3) ovens identified as 281-282, 283-284, and 285-286 shall each be limited to less than 0.56 pounds per hour per oven, after controls. Compliance with this limit in combination with potential emissions from ovens 551, 552, 553, 561, 562, 563, 564, 565, 566, and 567, shall render the requirements of 326 IAC 2-2 not applicable to the modifications performed in 1994, 1995 and 1996.
- (c) **The total VOC emissions from the eight (8) MAG HES-2 ovens identified as ovens 451 through 458, and the four (4) SICME SEL ovens 401/402, 403/404, 405/406, and 407/408 shall be limited to 126.1 tons per twelve (12) consecutive month period, after controls. Compliance with this limit, in conjunction with potential emissions from all other emissions units at this source shall ensure that the source-wide VOC potential to emit remains below 250 tons per twelve (12) consecutive month period, rendering the requirements of 326 IAC 2-2 not applicable.**

D.1.4 Hazardous Air Pollutants (HAP) Minor Limits [40 CFR 63, Subpart M]

- (a) ~~Pursuant to Significant Permit Modification 003-22934-00014, issued on December 20, 2006, and as revised by T003-21713-00014, for~~ For the emissions units identified as 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 551, 552, 553, 561, 562, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254, 270, 540, 541, 542, 543, 544, 550, and XR-1, **MAG HES-2 ovens 451 through 458, and SICME SEL ovens 401/402, 403/404, 404/405, and 407/408** the total usage of coatings, solvents, lubricants and cleanup solvents shall be limited such that the single Hazardous Air Pollutant (HAP) emissions shall be limited to less than nine (9) tons per twelve (12) consecutive month period for each HAP, with compliance determined at the end of each month.
- (b) ~~Pursuant to Significant Permit Modification 003-22934-00014, issued on December 20, 2006, and as revised by T003-21713-00014, for~~ For the emissions units identified as 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 551, 552, 553, 561, 562, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254, 270, 540, 541, 542, 543, 544, 550, and XR-1, **MAG HES-2 ovens 451 through 458, and SICME SEL ovens 401/402, 403/404, 404/405, and 407/408** the total usage of coatings, solvents, lubricants and cleanup solvents shall be limited such that the combined Hazardous Air

Pollutant (HAP) emissions shall be limited to less than twenty-four (24) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

These limits, in conjunction with the potential to emit of a single HAP and a combination of HAPs from the boilers and insignificant activities at the source, shall limit the source-wide emissions of any single HAP to less than ten (10) tons per year and any combination of HAPs to less than twenty-five (25) tons per year. Compliance with these limits shall make the source an area source and shall render the requirements of 40 CFR 63, Subpart M, not applicable.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-5]

- (a) Pursuant to CP-003-9913-00014, issued October 28, 1998, 326 IAC 8-1-2(a), and 326 IAC 8-1-5, the Permittee shall operate the catalytic oxidizers on wire enameling ovens 247, 248, 250, 251, 252, 253, and 254 to achieve compliance with Condition D.1.1(a).
- (b) Pursuant to CP-003-9913-00014, issued October 28, 1998, 326 IAC 8-1-2(a), and 326 IAC 8-1-5, the Permittee shall operate the thermal oxidizer on wire enameling oven 270 to achieve compliance with Condition D.1.1(b).
- (c) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the external thermal oxidizers on wire enameling ovens 210-213, 220-223, and 230-238 to achieve compliance with Condition D.1.2(a).
- (d) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizers on wire enameling ovens 281-282, 283-284 and 285-286 to achieve compliance with Conditions D.1.2(b).
- (e) **Pursuant to 326 IAC 8-2-8, the Permittee shall operate the thermal oxidizers on the MAG HES-2 ovens 451 through 458, and SICME SEL ovens 401/402, 403/404, 404/405, and 407/408 in order to achieve compliance with Condition D.1.2.**

D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee shall conduct performance tests to verify VOC control efficiency as shown below. If the representative oven that is required to be tested has not been in operation for at least six (6) months prior to the test deadline, another similar oven in the same group of ovens shall be tested. If none of the ovens in a particular test group has been in operation for at least six (6) months prior to the test deadline, then the Permittee is not required to conduct testing for that group. However, upon startup of any oven in a test group that has not been in operation for at least six (6) months prior to the test deadline, the Permittee shall conduct a performance test to verify VOC and/or HAP control efficiency within ninety (90) days of startup of that oven.

- (a) In order to demonstrate compliance with Conditions D.1.2(a) and D.1.3(a), the Permittee shall conduct a performance test to verify the VOC control efficiency for the external thermal oxidizers for ovens 210-213, 220-223, and 230-238 using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed within one (1) year of the issuance of this permit. One representative oven shall be tested for VOC emissions. Testing shall be performed such that no single oven is tested twice in a fifteen (15) year cycle. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (b) In order to demonstrate compliance with Conditions D.1.2(b) and D.1.3(c), the Permittee shall conduct a performance test to verify the VOC control efficiency for the thermal oxidizers for ovens 281-282, 283-284 and 285-286 using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed by July 19, 2010. One representative oven shall be tested for VOC emissions. Testing shall be performed such that no single oven is tested twice in a

fifteen (15) year cycle. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.

- (c) In order to demonstrate compliance with Conditions D.1.2 and D.1.3(c), the Permittee shall conduct a performance test to verify the VOC control efficiency for the thermal oxidizers for ovens 281-282, 283-284 and 285-286 using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed by July 19, 2010. One representative oven shall be tested for VOC emissions. Testing shall be performed such that no single oven is tested twice in a fifteen (15) year cycle. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (c) In order to demonstrate compliance with Conditions D.1.1(a) and D.1.3(b), the Permittee shall conduct a performance test to verify the VOC control efficiency for the catalytic oxidizers for ovens 247, 248, 250, 251, 252, 253, and 254 using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed by July 18, 2010. Two (2) representative ovens shall be tested for VOC emissions. The test shall be done within the last 2 months of the life of the catalyst. Testing shall be performed such that no single oven is tested twice in a fifteen (15) year cycle. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (d) In order to demonstrate compliance with Condition D.1.1(b), the Permittee shall conduct a performance test to verify the VOC control efficiency for the thermal oxidizer for oven 270 using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed by July 19, 2010. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.
- (e) No later than 180 days after the installation of any one (1) of the eight (8) MAG HES-2 ovens, identified as ovens 451 through 458, in order to demonstrate compliance with Conditions D.1.2 and D.1.3(c), the Permittee shall conduct a performance test to verify the VOC control efficiency using methods approved by the Commissioner. One representative oven shall be tested for VOC emissions. Testing shall be performed such that no single oven is tested twice in a fifteen (15) year cycle. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.**
- (f) No later than 180 days after the installation of any one (1) of the four (4) SICME SEL ovens, identified as ovens 401/402, 403/404, 405/406, and 407/408, in order to demonstrate compliance with Conditions D.1.2 and D.1.3(c), the Permittee shall conduct a performance test to verify the VOC control efficiency using methods approved by the Commissioner. One representative oven shall be tested for VOC emissions. Testing shall be performed such that no single oven is tested twice in a fifteen (15) year cycle. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.**

~~(e)~~(g) HAP Testing Requirements:

As long as the total VOC emissions from the magnet wire ovens at this source remain below nine (9) tons in any twelve (12) consecutive month period, no HAP testing is required.

In order to demonstrate compliance with Condition D.1.4, the Permittee shall perform overall control efficiency of VOC testing on one oven from each of the following ~~five (5)~~ **seven (7)** oven groups (210-213, 220-223, 230-237, and XR-1), (281-282, 283-284, and

285-286), (551, 552, 553, 561, 562, 563, 564, 565, 566, and 567), (243, 244, 245, 246, 247, 248, 250, 251, 252, 253, and 254), ~~and (270),~~ **(451 through 458), and (401/402, 403/404, 405/406, 407/408)** using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6, using methods determined by the Commissioner to be appropriate for each different oven design. The tests shall be performed within one (1) year of the issuance of this permit, or within five (5) years of the last valid test performed on each of these oven groups, whichever is later. The coating(s) tested shall be the wire coating used in each of these oven groups that has the lowest overall HAP destruction efficiency, as estimated by the manufacturer and approved by IDEM. This testing shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. Total VOC emissions for all ovens at this source shall be calculated each month using the following equation for VOC emissions:

$$\text{Total VOC emissions} = \sum_j [\sum_i (\text{VOC Content}_i (\%) / 100 \times \text{Coating Amount}_i)] \times (1.0 - \% \text{VOC control efficiency}_j / 100) + \sum_k (\text{uncontrolled VOC input}_k)$$

where:

j = each individual oven

i = each coating used in an oven

k = each solvent used in an oven whose VOC emissions are uncontrolled

The most recent VOC stack test results for each oven group shall be used in determining the specific VOC control efficiency for the ovens in that oven group in the equation above. A running twelve (12) month total of VOC emissions shall be calculated by adding the total volatile organic compound emitted for the previous month to the previous 11 months total VOC emitted so as to arrive at total VOC emissions for a 12 consecutive months period.

~~As long as the total VOC emissions from the magnet wire ovens at this source remain below nine (9) tons in any twelve consecutive month period, no HAP testing is required.~~

In the event that total VOC emissions from all of the magnet wire coating ovens at this source exceeds nine (9) tons in any twelve consecutive month period, then the source shall test for individual HAP emissions from the ovens within 180 days of the notification to IDEM reporting this discovery.

The Permittee shall perform overall control efficiency of HAP testing on one oven from each of the following ~~five (5)~~ **seven (7)** oven groups (210-213, 220-223, 230-237, and XR-1), (281-282, 283-284, and 285-286), (551, 552, 553, 561, 562, 563, 564, 565, 566, and 567), (243, 244, 245, 246, 247, 248, 250, 251, 252, 253, and 254), ~~and (270),~~ **(451 through 458), and (401/402, 403/404, 405/406, 407/408)** using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6, using methods determined by the Commissioner to be appropriate for each different oven design. The coating(s) tested shall be the wire coating used in each of these oven groups that has the lowest overall HAP destruction efficiency, as estimated by the manufacturer and approved by IDEM. This testing shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing. Single HAP and total HAP emissions for all ovens at this source shall be calculated each month using the following equation for HAP emissions:

$$\text{Single HAP emissions} = \sum_j [\sum_i (\text{single HAP Content}_i (\%) / 100 \times \text{Coating Amount}_i)] \times (1.0 - \% \text{HAP control efficiency}_j / 100) + \sum_k (\text{uncontrolled HAP input}_k)$$

$$\text{Total HAP emissions} = \sum_j [\sum_i (\text{total HAP Content}_i (\%) / 100 \times \text{Coating Amount}_i)] \times (1.0 - \% \text{ HAP control efficiency}_j / 100) + \sum_k (\text{uncontrolled HAP input}_k)$$

where:

j = each individual oven

i = each coating used in an oven

k = each solvent used in an oven whose HAP emissions are uncontrolled

The most recent HAP stack test results for each oven group shall be used in determining the specific HAP control efficiency for the ovens in that oven group in the equation above. A running twelve (12) month total of single HAP and total HAP emissions shall be calculated by adding the single HAP and total HAP emitted for the previous month to the previous 11 months single HAP and total HAP emitted so as to arrive at single HAP and total HAP emissions for a 12 consecutive months period.

- (f) For a higher VOC and/or HAP content coating than that used during the stack tests in (a) – (e) above, the following procedure shall be followed:
- (1) Calculate the new minimum required control efficiency for the new coating (E_{new});
 - (2) Calculate the new maximum HAP loading (L_{new}) for the higher HAP content enamel;
 - (3) Calculate the current maximum HAP loading (L_{current});
 - (4) If E_{new} is lower than the last stack test control efficiency, and L_{new} is lower than L_{current} , Permittee shall be allowed to use the same destruction efficiency for calculations for the higher HAP content enamel.
- (g) Before using a coating that would lead to a higher VOC and/or HAP loading in pounds per hour than what was used during the stack test required in paragraphs (a) through (e) above, the Permittee shall conduct a performance test to verify VOC and/or HAP control efficiency as per Conditions D.1.1, D.1.2, D.1.3, and D.1.4 for the catalytic/thermal oxidizers using methods approved by the Commissioner.
- (h) In order to demonstrate compliance with Condition D.1.1(a)(3) for the twelve (12) month catalyst replacement frequency requirement in Condition D.1.1(a)(2), the Permittee shall conduct a one-time performance test to verify the VOC control efficiency for the catalytic oxidizers for ovens 243, 244, 245, or 246 using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed within one year of issuance of this permit. One (1) representative oven shall be tested for VOC emissions. The test shall be done on an oven with a catalyst that has been in use for at least twelve (12) months. This test may be done in conjunction with the VOC testing required for this oven group in Condition D.1.7(e).

D.1.8 VOC Emissions

- (a) Compliance with Condition D.1.1(a)(3) shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to the previous 11 months total VOC emitted so as to arrive at VOC emissions for 12 consecutive months period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

$$\text{Total VOC emissions} = \sum_j [\sum_i (\text{VOC Content}_i (\%) / 100 \times \text{Coating Amount}_i)] \times (1.0 - \%$$

VOC control efficiency_j/ 100)] + \sum_k (uncontrolled VOC input_k)

where:

j = each individual oven

i = each coating used in an oven

k = each solvent used in an oven whose VOC emissions are uncontrolled

The % VOC control efficiency for ovens 247, 248, 250, 251, 252, 253, and 254 shall be determined by testing pursuant to Condition D.1.7.

- (b) Compliance with Condition D.1.4 shall be demonstrated within 30 days of the end of each month by demonstrating that VOC emissions from ovens 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 551, 552, 553, 561, 562, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254, 270, 540, 541, 542, 543, 544, 550, and XR-1 do not exceed nine (9) tons per year. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at VOC emissions for 12 consecutive months period. The VOC emissions for a month can be arrived at using the formula in paragraph (a) above. The % VOC control efficiency for each oven group as determined by the most recent VOC stack testing pursuant to Condition D.1.7(e) for the ovens in that oven group shall be used in determining the specific VOC control efficiency for the ovens in that oven group.

- (c) **In order to demonstrate compliance with Condition D.1.3(c), the total VOC emissions for the eight (8) MAG HES-2 ovens identified as 451 through 458 and the four (4) SICME SEL ovens identified as 401/402, 403/404, 405/406, and 407/408 shall be calculated each month using the following equation for VOC emissions:**

Total VOC emissions = \sum_j [\sum_i (VOC Content_i (%) / 100 x Coating Amount_i)] x (1.0 - % VOC control efficiency_j/ 100)] + \sum_k (uncontrolled VOC input_k)

where:

j = each individual oven

i = each coating used in an oven

k = each solvent used in an oven whose VOC emissions are uncontrolled

D.1.9 Hazardous Air Pollutant (HAP) Calculations

In the event that total VOC emissions from all of the magnet wire coating ovens exceeds nine (9) tons per year as determined pursuant to Condition D.1.8, the Permittee shall demonstrate compliance with the HAP emission limitation in Condition D.1.4, by determining the HAP emissions for each month for the emissions units identified as 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 551, 552, 553, 561, 562, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254, 270, 540, 541, 542, 543, 544, 550, and XR-1, **451 through 458, 401/402, 403/404, 405/406, and 407/408.**

For ovens 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 551, 552, 553, 561, 562, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254, 270, and XR-1, **451 through 458, 401/402, 403/404, 405/406, and 407/408**, HAP emissions shall be determined as follows:

HAP₁ emissions = [HAP usage all ovens x (1.0 - % HAP control efficiency / 100)]

For ovens 540, 541, 542, 543, 544, and 550, HAP emissions shall be determined as follows:

HAP₂ emissions = (HAP usage of ovens 540, 541, 542, 543, 544, and 550)

Total HAP Emissions = HAP₁ emissions + HAP₂ emissions

The % HAP control efficiency for each oven group shall be determined by testing per Condition D.1.7.

D.1.10 Thermal/Catalytic Oxidizer Operation [40 CFR 64]

- (a) From the date of issuance of Part 70 permit renewal 003-22934-00014 until the approved stack test results are available, and in order to demonstrate compliance with Conditions D.1.1, D.1.2, and D.1.3:
- (1) The Permittee shall operate the external thermal oxidizers 3 hour average temperature for ovens 210-213 and 220-223 at or above the temperature that results in the required 95.0% control efficiency, as determined during compliance tests.
 - (2) The Permittee shall operate the external thermal oxidizers 3 hour average temperature for oven 230-238 at or above the temperature that results in the required 97.7% control efficiency, as determined during compliance tests.
 - (3) The Permittee shall operate the thermal oxidizers 3 hour average temperature for ovens 281-282, 283-284 and 285-286 at or above the temperature of 1250 degrees F or the temperature determined during compliance tests to maintain a 96.6% control efficiency.
 - (4) The Permittee shall operate the catalytic oxidizers 3 hour average temperature for ovens 247, 248, 250, 251, 252, 253, and 254 at or above the temperature that results in the required 90.0% control efficiency, as determined during compliance tests.
 - (5) The Permittee shall operate the thermal oxidizer 3 hour average temperature for oven 270 at or above the temperature of 1250 degrees F or the temperature determined during compliance tests to maintain a 85.0% control efficiency.
 - (6) **Until approved stack test results are available, the Permittee shall operate the thermal oxidizers' 3 hour average temperature for ovens identified as 451 through 458 at or above the temperature of 921 degrees F or the temperature determined during the latest compliant stack test to maintain 96.7% control efficiency.**
 - (7) **Until approved stack test results are available, the Permittee shall operate the thermal oxidizers' 3 hour average temperature for ovens identified as 401/402, 403/404, 405/406, 407/408 at or above the temperature of 1234 degrees F or the temperature determined during the latest compliant stack test to maintain 96.4% control efficiency.**
- (b) From the date of issuance of the Part 70 permit until the approved stack test results are available, and in order to demonstrate compliance with Condition D.1.4, the Permittee shall operate the catalytic/thermal oxidizers 3 hour average temperature for ovens 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 551, 552, 553, 561, 562, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254, 270, and XR-1 at or above the temperature that results in the HAP (VOC) control efficiency necessary to comply with the requirements of Condition D.1.4, as demonstrated by Condition D.1.8 or D.1.9.

- (c) From the date that the approved stack test results are available, and in order to demonstrate compliance with Condition D.1.4, the Permittee shall operate the catalytic/thermal oxidizers 3 hour average temperature for ovens 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 552, 553, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254, 270, and XR-1 at or above the temperature that results in the HAP (VOC) control efficiency necessary to comply with the requirements of Condition D.1.4, as demonstrated by Condition D.1.8 or D.1.9.
- (d) **From the date that the approved stack test results are available, and in order to demonstrate compliance with Condition D.1.4, the Permittee shall operate the catalytic/thermal oxidizers 3 hour average temperature for ovens 451 through 458 at or above the temperature that results in the HAP (VOC) control efficiency necessary to comply with the requirements of Condition D.1.4, as demonstrated by Condition D.1.8 or D.1.9.**
- (e) **From the date that the approved stack test results are available, and in order to demonstrate compliance with Condition D.1.4, the Permittee shall operate the catalytic/thermal oxidizers 3 hour average temperature for ovens 401/402, 403/404, 405/406, and 407/408 at or above the temperature that results in the HAP (VOC) control efficiency necessary to comply with the requirements of Condition D.1.4, as demonstrated by Condition D.1.8 or D.1.9.**
- ~~(d)~~ (f) The Permittee shall determine the 3 hour block average minimum temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1, D.1.2, D.1.3, and D.1.4, as approved by IDEM.
- ~~(e)~~(g) From the date of the approved stack test results are available, and in order to demonstrate compliance with Conditions D.1.1, D.1.2, D.1.3, and D.1.4, the Permittee shall operate the thermal/catalytic oxidizers at or above the 3 hour block average minimum temperature as observed during the compliant stack test.

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain the following records for ovens 247, 248, 250, 251, 252, 253, 254, 270, 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 245, and 246, **451 through 458, 401/402, 403/404, 405/406, and 407/408** in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits and/or VOC emission limits established in Conditions D.1.1, D.1.2, and D.1.3.
 - (1) The amount and VOC content of each coating, solvent, lubricant and cleanup solvent used in each oven on a monthly basis. Records shall include purchase orders, invoices, supplier data sheets, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total VOC usage for each month;
 - (3) The weight of VOC usage for each compliance period.
 - (4) The weight of VOCs emitted for each compliance period, based on VOC usage in the magnet wire ovens x (1 – VOC control efficiency %/100) + uncontrolled VOC input.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain the following records for ovens 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 551, 552, 561, 562, 553, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254,

270, 540, 541, 542, 543, 544, 550, and XR-1, **451 through 458, 401/402, 403/404, 405/406, and 407/408** in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limits established in Condition D.1.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The amount and VOC and HAP content of each coating, solvent, lubricant and cleanup solvent used on a monthly basis. Records shall include purchase orders, invoices, supplier data sheets, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total VOC and HAP usage for each month;
 - (3) The weight of VOC and HAP usage for each compliance period.
 - (4) The weight of VOCs emitted for each compliance period, based on VOC usage in the magnet wire ovens $\times (1 - \text{VOC control efficiency \%}/100) + \text{uncontrolled VOC input}$.
 - (5) In the event that total VOC emissions exceeds nine (9) tons per year, as determined by condition D.1.8, the Permittee shall also maintain records of the weight of single HAPs and total HAPs emitted for each compliance period, based on HAP usage in the magnet wire ovens $\times (1 - \text{HAP control efficiency \%}/100) + \text{uncontrolled HAP input}$.
- (c) To document compliance with Condition D.1.1(a)(2), the Permittee shall maintain records of the dates that the catalysts are replaced in ovens 247, 248, 250, 251, 252, 253 and 254.
 - (d) To document compliance with Condition D.1.12, the Permittee shall maintain the continuous temperature records and 3 hour average temperature records.
 - (e) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Conditions D.1.1(a)(3), **D.1.3(c)**, and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) In the event that total VOC emissions exceeds nine (9) tons in any twelve (12) consecutive month period, the Permittee shall submit a quarterly summary of the HAP emissions to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported, to document compliance with Condition D.1.4. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) In the event that total VOC emissions exceeds nine (9) tons in any twelve (12) consecutive month period, the Permittee shall submit a notification to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days of discovery that the VOC emissions exceed nine (9) tons per twelve consecutive month period. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Part 70 Quarterly Report

Source Name: Rea Magnet Wire Company
 Source Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
 Mailing Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
 Part 70 Permit No.: T003-21713-00014
 Facility: Ovens 210-213, 220-223, 230-238, 281-282, 283-284, 285-286, 551, 552, 553, 561, 562, 563, 564, 565, 566, 567, 243, 244, 245, 246, 247, 248, 250, 251, 252, 253, 254, 270, 540, 541, 542, 543, 544, 550, and XR-1, **401/402, 403/404, 405/406, 407/408, 451 through 458**
 Parameter: Single and Combination Hazardous Air Pollutants (HAPs)
 Limits: Less than nine (9) tons for each single hazardous air pollutant (HAP)
 Less than twenty-four (24) tons of combined Hazardous Air Pollutants (HAPs)
 The HAP limits shall be based on a twelve (12) consecutive month period

Quarter: _____ Year _____

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

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

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Rea Magnet Wire Company, Inc.
Source Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
Mailing Address: 3600 East Pontiac Street, Fort Wayne, Indiana 46803
Part 70 Permit No.: T003-21713-00014
Facility: Ovens 451-458, 401/402, 403/404, 405/406, 407/408
Parameter: VOC emissions
Limit: Less than 126.1 tons total, per twelve (12) consecutive month period.

YEAR:

QUARTER:

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.

Deviation has been reported on:

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

Attach a signed certification to complete this report.

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 003-26729-00014 and Significant Permit Modification No. 003-26728-00014. The staff recommend to the Commissioner that this Part 70 Minor Source Modification and Significant Permit Modification be approved.

Recommendation and Conclusion

- (1) Based on the facts, conditions and evaluations made, OAQ recommends to the IDEM Commissioner that the MSM 003-26729-00014 and SPM 003-26728-00014 be approved.
- (2) A copy of the preliminary findings is also available on the Internet at: www.in.gov/idem/4223.htm
- (3) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem/

IDEM Contact

Questions regarding this proposed permit can be directed to Madhurima Moulik at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0868 or toll free at 1-800-451-6027 extension 3-0868.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations - MAG HES-2 Ovens 451-458**

**Company Name: Rea Magnet Wire Company, Inc.
Address City IN Zip: 3600 East Pontiac Street; Fort Wayne, IN 46803
MSM No.: 003-26729-00014
SPM No.: 003-26728-00014
Reviewer: Madhurima D. Moulik
Date: 7/17/2008**

Uncontrolled Emissions

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	VOC pounds per hour	VOC pounds per day	VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency			
Elantas Polyurethane 1245-30 - Basecoat	8.72	70.00%	0.0%	70.0%	0.0%	23.70%	0.00492	744.0	6.10	6.10	22.34	536.25	97.86	0.00	25.76	100%			
Elantas Nylon C515M 13 - Topcoat	8.33	87.00%	0.0%	87.0%	0.0%	10.70%	0.00106	744.0	7.25	7.25	5.72	137.17	25.03	0.00	67.73	100%			
State Potential Emissions									Per Oven										
Add worst case coating to all solvents							0.00598				28.06		673.41		122.90		0.00		
										Controlled Emissions									
Actual Oxidizer Control 98.5%										0.095		0.421		10.10		1.84		0.498	
PTE emissions after control = (gallons of material per unit) * (units/hr) * (lbs of VOC / gallon) * (8760/2000) * (1-0.985) = 2.0 tons of VOC per year total																			

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used