



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

TO: Interested Parties / Applicant

DATE: September 26, 2011

RE: Rea Magnet Wire Company / 157-30327-00032

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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

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

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

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

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

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

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

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

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

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

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



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**Part 70 Operating Permit Renewal  
OFFICE OF AIR QUALITY**

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

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T157-30327-00032	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 26, 2011  Expiration Date: September 26, 2016

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## SECTION A SOURCE SUMMARY

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

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

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

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

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

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

- (a) Three (3) MOCO wire enameling ovens with internal catalytic oxidizers, identified as emissions units 417-418, 421-424 and 425-428, installed prior to January 1, 1980, with a maximum capacity of 54.0 units per hour each, and maximum enamel usage rate of 0.15 gallons per unit, with emissions controlled by add-on thermal incinerators, and exhausting to stacks 5, 6 and 7, respectively.
- (b) Four (4) wire enameling ovens with internal catalytic oxidizers and add-on thermal incinerators for control:
  - (1) Three (3) GEM gas fired wire enameling ovens, identified as emissions units 101-110, 433-436 and 437-440, installed in 1982, with a maximum capacity rating of 67.2 units per hour each, and maximum enamel usage rate of 0.12 gallon per unit, with emissions controlled by add-on thermal incinerators, and exhausting to stacks 1, 8, 9 and 10 respectively.
  - (2) One (1) GEI electric wire enameling oven, identified as emissions unit 441-444, installed in 1986, with a maximum capacity of 40.3 units per hour each, and maximum enamel usage rate of 0.10 gallons per unit, with emissions controlled by an add-on thermal incinerator, and exhausting to stack 51.
- (c) Two (2) SICME model NEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 625-632U and 625-632L, installed in 1986, with a maximum capacity of 48.2 units per hour each, and maximum enamel usage (including basecoat and topcoat) 0.04 gallons per unit, with emissions exhausting to stacks 52 and 69, respectively.
- (d) The following SICME model SEL electric wire enameling ovens:

- (1) Three (3) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 595-596, 597-598 and 599-600, installed in 1994, with a maximum capacity of 19.56 units per hour each, and maximum enamel usage (including base coat and top coat) of 0.03 gallons per unit, with emissions exhausting to stacks 131, 132 and 133, respectively.
  - (2) Four (4) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 725-726, 727-728, 729-730 and 731-732, installed in 1995, with a maximum capacity of 55.8 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.01 gallons per unit, with emissions exhausting to stacks 134, 135, 136, 137, respectively.
  - (3) Four (4) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 733-734, 735-736, 737-738 and 739-740, installed in 1996, with a maximum capacity of 55.8 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.01 gallons per unit, with emissions exhausting to stacks 138, 139, 140 and 141, respectively.
- (e) Three (3) SICME model NEMG gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 601-612, 613-624 and 669-680, installed in 1995, with a maximum capacity of 195.12 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.015 gallons per unit, with emissions exhausting to stacks 101, 100 and 87 respectively.
  - (f) Eight (8) MAG HES-2 electric wire enameling ovens with internal thermal oxidizers, identified as emission units 741, 742, 743, 744, 745, 746, 747 and 748, installed in 1995, with a maximum 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 150, 151, 152, 153, 154, 155, 156 and 157, respectively.
  - (g) Four (4) Weather-Rite V-22 gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 467/468/469/470, 475/476/477/478, 479, and 480, installed in 1995, with a maximum of 30.6 units per hour each, and maximum enamel usage of 0.146 gallons per unit, with emissions exhausting to stacks 148, 149, 67 and 68, respectively.
  - (h) Four (4) Weather-Rite V-22 gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 445-447, 448-450, 461-463 and 464-466, installed in 1996, with a maximum of 30.6 units per hour each, and maximum enamel usage of 0.146 gallons per unit, with emissions exhausting to stacks 203, 204, 201, 202, respectively.
  - (i) One (1) Weather-Rite V-26 gas fired wire enameling oven with internal thermal oxidizer, identified as emission unit 405-406, constructed in 2007, with a maximum capacity of 24.0 units per hour and maximum enamel usage of 0.3091 gallons per unit, with emissions exhausting through stack 01.
  - (j) Four (4) SICME model SEM electric wire enameling ovens with an internal thermal oxidizer for control:
    - (1) Two (2) SICME model SEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 801-808 and 809-816, installed in 1996, with a maximum capacity of 174.2 units per hour each, and maximum enamel usage of 0.034 gallons per unit, with emissions exhausting to stacks 142 and 143, respectively.

- (2) Two (2) SICME model SEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 817-824 and 825-832, installed in 1997, with a maximum capacity of 174.2 units per hour each, and maximum enamel usage of 0.034 gallons per unit, with emissions exhausting to stacks 205 and 206, respectively.
- (k) Eight (8) MAG HES-5 electric wire enameling ovens with internal thermal oxidizers, identified as emission units 833, 834, 835, 836, 837, 838, 839, and 840, installed in 1997, with a maximum capacity of 174.2 units per hour each, and maximum enamel usage of 0.034 gallons per unit, with emissions exhausting to stacks 207, 208, 209, 210, 211, 212, 213 and 214, respectively.
- (l) Two (2) SICME model SEV electric wire enameling ovens with internal thermal oxidizers, identified as emission units 329-334 and 335-340, installed in 1996, with a maximum capacity of 57.96 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.05 gallons per unit, with emissions exhausting to stacks 144 and 145, respectively.
- (m) Two (2) SICME model SML electric wire enameling ovens with internal thermal oxidizers, identified as emission units 753 and 754, installed in 1997, with a maximum capacity of 40.8 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.026 gallons per unit, with emissions exhausting to stacks 217 and 218, respectively.
- (n) Eight (8) Sima electric wire enameling ovens with internal thermal oxidizers, identified as emission units 941 through 948, constructed in 2008, with a maximum total capacity of 153.12 units per hour, and maximum enamel usage (including basecoat and topcoat) of 0.049 gallons per unit, with emissions exhausting to stacks 219 through 226.
- (o) One (1) MAG HES5B identified as emission unit 951-958 (stacks 235-242) and two (2) MAG HES5 electric magnet wire enameling systems identified as emission units 961-968 (stacks 243-250), and 971-978 (stacks 227-234) respectively, each with eight (8) ovens with internal thermal oxidizers, each constructed in 2009, with a maximum total capacity of 149.1, 167.4, and 167.4 units per hour respectively, and maximum enamel usage of 62.4, 50.3, and, 50.3 lb/hr, respectively.
- (p) Twelve (12) MAG VZ enameling ovens with internal thermal oxidizers, identified as units 341-352, installed in 2011, with a maximum capacity of 103.7 units per hour and maximum enamel usage of 95.0 gallons per hour, with emissions exhausting to stacks 251-262.

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, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
  - (1) One (1) 5.0 MMBtu/hr natural gas fired boiler, installed in 1996, exhausting to stack number 47. [326 IAC 6-2-4]
  - (2) One (1) 5.0 MMBtu/hr natural gas fired boiler, installed in 1997, exhausting to stack number 48. [326 IAC 6-2-4]

- (b) One (1) superconductor stripping operation, identified as SS1, constructed in 2009, with a maximum stripping capacity of 900 feet of wire per hour and 0.193 lb/hr of enamel, exhausting to vent 33.
- (c) One (1) Samsco evaporator, identified as 700-316, permitted in 2009, exhausting to stack number 114, for the treatment of wastewater at the rate of 504 lb/hr.

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

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

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

## SECTION B GENERAL CONDITIONS

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

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

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- (a) This permit, T157-30327-00032, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

### B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

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

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

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

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

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

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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)]

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

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- (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 and Enforcement 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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]

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(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (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.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The

PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) 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 and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
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 and Enforcement 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.

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 T157-30327-00032 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, 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, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]**

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(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]**

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(a) No Part 70 permit revision or notice 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.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the 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  
Permit Administration and Support Section, 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

**B.20 Source Modification Requirement [326 IAC 2-7-10.5]**

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

**B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]**

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

- (a) Enter upon the Permittee's premises where a 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (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  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.23 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.24 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 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.7 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  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 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 that meets the requirements of 326 IAC 2-7-6(1) by a "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 Licensed 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 Licensed Asbestos Inspector to

thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

#### C.8 Performance Testing [326 IAC 3-6]

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
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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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

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

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

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

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

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Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning 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 normal or usual manner of operation.

- (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; and/or
  - (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 record the reasonable response steps 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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]**

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

- (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 except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, 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) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

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

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

## SECTION D.0 FACILITY OPERATION CONDITIONS

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

- (a) Three (3) MOCO wire enameling ovens with internal catalytic oxidizers, identified as emissions units 417-418, 421-424 and 425-428, installed prior to January 1, 1980, with a maximum capacity of 54.0 units per hour each, and maximum enamel usage rate of 0.15 gallons per unit, with emissions controlled by add-on thermal incinerators, and exhausting to stacks 5, 6 and 7, respectively.
- (b) Four (4) wire enameling ovens with internal catalytic oxidizers and add-on thermal incinerators for control:
  - (1) Three (3) GEM gas fired wire enameling ovens identified as emissions units 101-110, 433-436 and 437-440, installed in 1982, with a maximum capacity of 67.2 units per hour each, and maximum enamel usage rate of 0.12 gallon per unit, with emissions controlled by add-on thermal incinerators, and exhausting to stacks 1, 8, 9 and 10 respectively.
  - (2) One (1) GEI electric wire enameling oven identified as emissions unit 441-444, installed in 1986, with a maximum capacity of 40.3 units per hour each, and maximum enamel usage rate of 0.10 gallons per unit, with emissions controlled by an add-on thermal incinerator, and exhausting to stack 51.
- (c) Two (2) SICME model NEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 625-632U and 625-632L, installed in 1986, with a maximum capacity of 48.2 units per hour each, and maximum enamel usage (including basecoat and topcoat) 0.04 gallons per unit, with emissions exhausting to stacks 52 and 69, respectively.
- (d) The following SICME model SEL electric wire enameling ovens:
  - (1) Three (3) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 595-596, 597-598 and 599-600, installed in 1994, with a maximum capacity of 19.56 units per hour each, and maximum enamel usage (including base coat and top coat) of 0.03 gallons per unit, with emissions exhausting to stacks 131, 132 and 133, respectively.
  - (2) Four (4) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 725-726, 727-728, 729-730 and 731-732, installed in 1995, with a maximum capacity of 55.8 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.01 gallons per unit, with emissions exhausting to stacks 134, 135, 136, 137, respectively.
  - (3) Four (4) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 733-734, 735-736, 737-738 and 739-740, installed in 1996, with a maximum capacity of 55.8 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.01 gallons per unit, with emissions exhausting to stacks 138, 139, 140 and 141, respectively.

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

- (e) Three (3) SICME model NEMG gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 601-612 , 613-624 and 669-680, installed in 1995, with a maximum capacity of 195.12 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.015 gallons per unit, with emissions exhausting to stacks 101, 100 and 87 respectively.
- (f) Eight (8) MAG HES-2 electric wire enameling ovens with internal thermal oxidizers, identified as emission units 741, 742, 743, 744, 745, 746, 747 and 748, installed in 1995, with a maximum capacity 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 150, 151, 152, 153, 154, 155, 156 and 157, respectively.
- (g) Four (4) Weather-Rite V-22 gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 467/468/469/470, 475/476/477/478, 479, and 480, installed in 1995, with a maximum capacity of 30.6 units per hour each, and maximum enamel usage of 0.146 gallons per unit, with emissions exhausting to stacks 148, 149, 67 and 68, respectively.
- (h) Four (4) Weather-Rite V-22 gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 445-447, 448-450, 461-463 and 464-466, installed in 1996, with a maximum capacity of 30.6 units per hour each, and maximum enamel usage of 0.146 gallons per unit, with emissions exhausting to stacks 203, 204, 201, 202, respectively.
- (i) One (1) Weather-Rite V-26 gas fired wire enameling oven with internal thermal oxidizer, identified as emission units 405-406, constructed in 2007, with a maximum capacity of 24.0 units per hour each, and maximum enamel usage of 0.3091 gallons per unit, with emissions exhausting to stack 01.
- (j) Two (2) SICME model SEV electric wire enameling ovens with internal thermal oxidizers, identified as emission units 329-334 and 335-340, installed in 1996, with a maximum capacity of 57.96 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.05 gallons per unit, with emissions exhausting to stacks 144 and 145, respectively.
- (k) Four (4) SICME model SEM electric wire enameling ovens with an internal thermal oxidizer for control:
  - (1) Two (2) SICME model SEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 801-808 and 809-816, installed in 1996, with a maximum capacity of 174.2 units per hour each, and maximum enamel usage of 0.034 gallons per unit, with emissions exhausting to stacks 142 and 143, respectively.
  - (2) Two (2) SICME model SEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 817-824 and 825-832, installed in 1997, with a maximum capacity of 174.2 units per hour each, and maximum enamel usage of 0.034 gallons per unit, with emissions exhausting to stacks 205 and 206, respectively.
- (l) Eight (8) MAG HES-5 electric wire enameling ovens with internal thermal oxidizers, identified as emission units 833, 834, 835, 836, 837, 838, 839, and 840, installed in 1997, with a maximum capacity of 174.2 units per hour each, and maximum enamel usage of 0.034 gallons per unit, with emissions exhausting to stacks 207, 208, 209, 210, 211, 212, 213 and 214, respectively.

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

- (m) Two (2) SICME model SML electric wire enameling ovens with internal thermal oxidizers, identified as emission units 753 and 754, installed in 1997, with a maximum capacity of 40.8 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.026 gallons per unit, with emissions exhausting to stacks 217 and 218, respectively.
- (n) Eight (8) Sima electric wire enameling ovens with internal thermal oxidizers, identified as emission units 941 through 948, constructed in 2008, with a maximum total capacity of 153.12 units per hour, and maximum enamel usage (including basecoat and topcoat) of 0.049 gallons per unit, with emissions exhausting to stacks 219 through 226.
- (o) One (1) MAG HES5B identified as emission unit 951-958 (vents 235-242 and 381-388) and two (2) MAG HES5 electric magnet wire enameling systems identified as emission units 961-968 (vents 243-250 and 397-404), and 971-978 (vent 227-234 and 365-373) respectively, each with eight (8) ovens with internal thermal oxidizers, each constructed in 2009, with a maximum total capacity of 149.1, 167.4, and 167.4 units per hour respectively, and maximum enamel usage of 62.4, 50.3, and, 50.3 lb/hr, respectively.
- (p) Twelve (12) MAG VZ enameling ovens with internal thermal oxidizers, identified as units 341-352, installed in 2011, with a maximum capacity of 103.7 units per hour and maximum enamel usage of 95.0 gallons per hour, with emissions exhausting to stacks 251-262.
- (q) Insignificant Activities:  
  
Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
  - (1) One (1) 5.0 MMBtu/hr natural gas fired boiler, installed in 1996. [326 IAC 6-2-4]
  - (2) One (1) 5.0 MMBtu/hr natural gas fired boiler, installed in 1997. [326 IAC 6-2-4]
- (r) One (1) superconductor stripping operation, identified as SS1, constructed in 2009, with a maximum stripping capacity of 900 feet of wire per hour and 0.193 lb/hr of enamel, exhausting to vent 33.

(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.0.1 Prevention of Significant Deterioration Minor Limit [326 IAC 2-2]

- (a) The VOC usage at the magnet wire ovens shall be limited such that the emissions from all magnet wire ovens, in conjunction with VOC emissions from all other activities at this source, including the potential to emit of VOCs from insignificant activities, are less than 250 tons per twelve consecutive month period, with compliance determined at the end of each month.
- (b) The internal catalytic oxidizer and the thermal incinerator for each of the wire enameling ovens (units 417-418, 421-424, 425-428, 101-110, 433-436, 437-440 and 441-444) shall, in aggregate, achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%).

- (c) The internal thermal oxidizer for each magnet wire enameling oven (units 329-334, 335-340, 341-352, 467/468/469/470, 475/476/477/478, 479, 480, 445-447, 448-450, 461-463, 464-466, 601-612, 613-624, 625-632U, 625-632L, 669-680, 595-596, 597-598, 599-600, 741, 742, 743, 744, 745, 746, 747, 748, 753, 754, 725-726, 727-728, 729-730, 731-732, 733-734, 735-736, 737-738, 739-740, 941 through 948, 801-808, 809-816, 817-824, 825-832, 833, 834, 835, 836, 837, 838, 839, 840, 951-958, 961-968, 971-978 and 405-406) shall, in aggregate, achieve an overall efficiency of at least ninety-eight and five tenths percent (98.5%).

Compliance with the above requirements, in conjunction with VOC emissions from all other activities at this source, including the potential to emit of VOCs from insignificant activities, shall ensure that the source-wide VOC emissions are limited to less than 250 tons per twelve consecutive month period with compliance determined at the end of each month, rendering the requirements of 326 IAC 2-2 not applicable.

#### D.0.2 HAP Minor Limit

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

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

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

#### D.0.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and all control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

### Compliance Determination Requirements

#### D.0.4 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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- (a) The Permittee shall operate the thermal oxidizers to achieve compliance with Conditions D.0.1 and D.0.2.
- (b) Compliance with the VOC and HAP emission limitations contained in Conditions D.0.1 and D.0.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ reserves the authority to determine

compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

- (c) Compliance with the HAP emission limitations contained in Condition D.0.2 shall be determined within 30 days of the end of each month using the following equation:

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

Where:

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

- (d) Compliance with the VOC emission limitation in Condition D.0.1 shall be determined as follows:

The source-wide VOCs emitted for each compliance period = VOC usage in the magnet wire ovens  $\times$  (1 – overall control efficiency%) + uncontrolled VOC usage.

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

#### **D.0.5 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.0.1 and D.0.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP emission limits established in Conditions D.0.1 and D.0.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC and HAP content of each coating, solvent, lubricant and cleanup solvent used on a monthly basis. Records shall include purchase orders, invoices, "as supplied" and "as applied" VOC and HAP data sheets from the manufacturer, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The total VOC and HAP usage for each month;
  - (3) The weight of VOC and HAP usage for each compliance period.
  - (4) The weight of single HAPs and total HAPs emitted for each compliance period.
  - (5) VOCs emitted for each compliance period.
- (c) All records shall be maintained in accordance with Section C- General Record Keeping Requirements of this permit.

#### **D.0.6 Reporting Requirements**

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A quarterly summary of the information to document compliance with Conditions D.0.1 and D.0.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) Three (3) MOCO wire enameling ovens with internal catalytic oxidizers, identified as emission units 417-418, 421-424 and 425-428, installed prior to January 1, 1980, with a maximum capacity of 54.0 units per hour each, and maximum enamel usage rate of 0.15 gallons per unit, with emissions controlled by add-on thermal incinerators, and exhausting to stacks 5, 6 and 7, respectively.

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

### Compliance Determination Requirements

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

In order to demonstrate compliance with Condition D.0.2, the Permittee shall conduct performance tests to verify HAP control efficiency as listed 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 performance test to verify HAP control efficiency within ninety (90) days of startup of that oven.

- (a) The Permittee shall perform HAP testing of the ovens controlled by add-on thermal oxidizers, utilizing methods as approved by the Commissioner, for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM. This test shall be completed on or before 11/02/11 and repeated at least once every five (5) years from the date of the latest valid compliance demonstration. Stack testing shall be performed in accordance with 326 IAC 3-6.
- (b) One representative add-on thermal oxidizer from the three oxidizers that control any of the following: the three (3) MOCO magnet wire ovens listed in Section D.1, the three (3) GEM gas fired wire enameling ovens identified as emission units 429-432, 433-436 and 437-440 (listed in Section D.2), or one (1) GEI electric wire enameling oven identified as emission unit 441-444 (listed in Section D.2), shall be tested. The thermal oxidizer tested shall be the oxidizer in which the longest amount of time has elapsed since its previous test.
- (c) Before using a coating that would lead to a higher HAP loading in pounds per hour than what was used during the stack test required in (a) above, the Permittee shall conduct a performance test to verify HAP control efficiency for thermal oxidizers using methods approved by the Commissioner.
- (d) For a higher HAP content coating than that used during the stack test in (a) above, the following procedure shall be followed:
- (1) Calculate the new minimum required control efficiency for the new coating ( $E_{new}$ );
  - (2) Calculate the new maximum HAP loading ( $L_{new}$ ) for the higher HAP content enamel;
  - (3) Calculate the current maximum HAP loading ( $L_{current}$ );

- (4) If  $E_{new}$  is lower than the last stack test control efficiency, and  $L_{new}$  is lower than  $L_{current}$ , Permittee shall be allowed to use the same destruction efficiency for calculations for the higher HAP content enamel.

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

#### **D.1.2 Thermal Oxidizer Operation**

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- (a) From the date of issuance of the Part 70 permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizers' 3 hour average temperature at or above 1360 deg F.
- (b) The Permittee shall determine the 3 hour block average minimum temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.0.1, as approved by IDEM.
- (c) From the date of the approved stack test results are available, the Permittee shall operate the thermal oxidizers at or above the 3 hour block average minimum temperature as observed during the compliant stack test to maintain an overall control efficiency of not less than ninety eight and five-tenths percent (98.5%) of volatile organic compound (VOC) in order to demonstrate compliance with Condition D.0.1.

#### **D.1.3 Parametric Monitoring**

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- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature of the thermal oxidizer. For the purposes of this condition, continuous monitoring shall mean no less often than once per fifteen (15) minutes. The output from this monitoring system and the three hour average temperatures shall be recorded whenever the thermal oxidizer is in operation.
- (b) If the primary continuous monitoring system is not in operation, the oxidizer temperature will be recorded using some manner of secondary system, such as with back-up electro-mechanical hardware or manually if necessary. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of the thermal oxidizer. Continuous monitoring shall mean no less often than once per fifteen (15) minutes.
- (c) The oxidizer shall operate such that if the three-hour average temperature falls below the 3 hour block average minimum required temperature (setpoint) as determined by the latest stack test, corrective actions shall be taken to return the thermal oxidizer to at least the required minimum temperature setpoint within 15 minutes. Corrective action must return oxidizer temperature to or above the minimum setpoint within thirty (30) minutes of the corrective action, or the enamel flow to the oven shall be shut off. Failure to take corrective action or failure to shut off the enamel flow as stated above shall be considered a deviation from this permit.
- (d) All actions described in paragraph (c) above must be taken in accordance with Section C - Response to Excursions or Exceedances and failure to take action consistent with Section C - Response to Excursions or 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.1.4 Record Keeping Requirements**

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To document compliance with Condition D.1.2, the Permittee shall maintain continuous temperature records and 3 hour average temperature records.

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (b) Four (4) wire enameling ovens with an internal catalytic oxidizer and add-on thermal incinerators for control:
- (1) Three (3) GEM gas fired wire enameling ovens, identified as emission units 101-110, 433-436 and 437-440, installed in 1982, with a maximum capacity of 67.2 units per hour each, and maximum enamel usage rate of 0.12 gallon per unit, with emissions controlled by add-on thermal incinerators, and exhausting to stacks 1, 8, 9 and 10 respectively.
  - (2) One (1) GEI electric wire enameling oven, identified as emission unit 441-444, installed in 1986, with a maximum capacity of 40.3 units per hour each, and maximum enamel usage rate of 0.10 gallons per unit, with emissions controlled by an add-on thermal incinerator, and exhausting to stack 51.
- (c) Two (2) SICME model NEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 625-632U and 625-632L, installed in 1986, with a maximum capacity of 48.2 units per hour each, and maximum enamel usage (including basecoat and topcoat) 0.04 gallons per unit, with emissions exhausting to stacks 52 and 69, respectively.

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

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

#### D.2.1 VOC Limitation - Magnet Wire Coating Operations [326 IAC 8-2-8]

- (a) Pursuant to 326 IAC 8-2-8 (Magnet Wire Coating Operations), the owner or operator shall not allow the discharge into the atmosphere of VOC in excess of 1.7 pounds of VOC per gallon of coating, excluding water, delivered to the coating applicator from magnet wire coating operations.
- (b) Pursuant to 326 IAC 8-1-2(b), the enameling process lines VOC emission shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon coating solids, allowed in (a).

The equivalency was determined by the following equation:

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

Where

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

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

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

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

- (c) The pounds of VOC per gallon of coating solids shall be limited to less than 2.21, where 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.

- (d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the catalytic or thermal oxidizers shall be no less than the equivalent overall control 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 oxidizers controlling the magnet wire ovens shall be 98.5% or greater.

### Compliance Determination Requirements

#### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2]

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

#### D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.0.1, D.0.2 and D.2.1, the Permittee shall conduct performance tests to verify VOC and HAP control efficiency as listed 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 performance test to verify VOC and/or HAP control efficiency within ninety (90) days of startup of that oven.

- (a) The Permittee shall conduct a performance test to verify the VOC control efficiency for the internal catalytic oxidizer and thermal incinerator using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 101-110, 433-436, 437-440 or 441-

444. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be completed on or before 03/18/2013 and shall be repeated at least once every five (5) years from the date of the latest valid compliance demonstration.
- (b) The Permittee shall conduct a performance test to verify the VOC control efficiency for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 625-632U, 625-632L. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be completed on or before 10/14/2014 and repeated at least once every five (5) years from the date of the latest valid compliance demonstration.
- (c) Before using a coating that would lead to a higher VOC loading in pounds per hour than what was used during the stack tests required in (a), (b), and (c) above, the Permittee shall conduct a performance test to verify VOC control efficiency for thermal oxidizers using methods approved by the Commissioner.
- (d) For a higher VOC content coating than that used during the stack tests in (a), (b), and (c) above, the following procedure shall be followed:
- (1) Calculate the new maximum VOC loading ( $L_{new}$ ) for the higher VOC content enamel;
  - (2) Calculate the current maximum VOC loading ( $L_{current}$ );
  - (3) If  $L_{new}$  is lower than  $L_{current}$ , Permittee shall be allowed to use the higher VOC content enamel.
- (e) The Permittee shall perform HAP testing of the following oven groups, utilizing methods as approved by the Commissioner, for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Stack testing shall be performed in accordance with 326 IAC 3-6. HAP testing shall be conducted as follows:
- (1) One representative add-on thermal oxidizer from the three oxidizers that control any of the following: the three (3) MOCO magnet wire ovens listed in Section D.1, the three (3) GEM gas fired wire enameling ovens identified as emission units 101-110, 433-436 and 437-440 (listed in Section D.2), or one (1) GEI electric wire enameling oven identified as emission unit 441-444 (listed in Section D.2), shall be tested. The thermal oxidizer tested shall be the oxidizer in which the longest amount of time has elapsed since its previous test. This test shall be completed on or before 11/07/2012 and repeated at least once every five (5) years from the date of the latest valid compliance demonstration.
- (f) For a higher HAP content coating than that used during the stack tests in (f) above, the following procedure shall be followed:
- (1) Calculate the new maximum HAP loading ( $L_{new}$ ) for the higher VOC content enamel;
  - (2) Calculate the current maximum HAP loading ( $L_{current}$ );
  - (3) If  $L_{new}$  is lower than  $L_{current}$ , Permittee shall be allowed to use the same destruction efficiency for calculations for the higher HAP content enamel.

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

### D.2.4 Thermal Oxidizer Operation

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- (a) Until the latest approved stack test results are available for ovens 101-110, 433-436, 437-440 and 441-444, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1150 degrees Fahrenheit.
- (b) Until the latest approved stack test results are available for ovens 625-632U, 625-632L, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature of 1178 degrees Fahrenheit.
- (c) The Permittee shall determine the 3 hour block average minimum temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.2.1, as approved by IDEM.
- (d) In order to demonstrate compliance with Condition D.2.1, from the date of the approved stack test results are available, the Permittee shall maintain the thermal oxidizer at or above the 3 hour block average minimum temperature as observed during the compliant stack test to maintain an overall control efficiency of not less than ninety eight and five-tenths percent (98.5%) of volatile organic compound (VOC).

### D.2.5 Parametric Monitoring

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- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature of the thermal oxidizer. For the purposes of this condition, continuous monitoring shall mean no less often than once per fifteen (15) minutes. The output from this monitoring system and the three hour average temperatures shall be recorded whenever the thermal oxidizer is in operation.
- (b) If the primary continuous monitoring system is not in operation, the oxidizer temperature will be recorded using some manner of secondary system, such as with back-up electro-mechanical hardware or manually if necessary. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of the thermal oxidizer. Continuous monitoring shall mean no less often than once per fifteen (15) minutes.
- (c) The oxidizer shall operate such that if the three-hour average temperature falls below the 3 hour block average minimum required temperature (setpoint) as determined by the latest stack test, corrective actions shall be taken to return the thermal oxidizer to at least the required minimum temperature setpoint within 15 minutes. Corrective action must return oxidizer temperature to or above the minimum setpoint within thirty (30) minutes of the corrective action, or the enamel flow to the oven shall be shut off. Failure to take corrective action or failure to shut off the enamel flow as stated above shall be considered a deviation from this permit.
- (d) All actions described in paragraph (c) above must be taken in accordance with Condition C.14 - Response to Excursions or Exceedances and failure to take action consistent with Condition C.14 - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

### **D.2.6 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.2.1 and D.2.4, the Permittee shall maintain the following records:
  - (1) The VOC content of each coating, solvent, lubricant and cleanup solvent used. Records shall include purchase orders, invoices, "as supplied" and "as applied" VOC and HAP data sheets from the manufacturer, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The continuous temperature records and 3 hour average temperature records.
- (b) All records shall be maintained in accordance with Section C – General Record Keeping Requirements of this permit.

### SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (d) The following SICME model SEL electric wire enameling ovens:
- (1) Three (3) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 595-596, 597-598 and 599-600, installed in 1994, with a maximum capacity of 19.56 units per hour each, and maximum enamel usage (including base coat and top coat) of 0.03 gallons per unit, with emissions exhausting to stacks 131, 132 and 133, respectively.
  - (2) Four (4) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 725-726, 727-728, 729-730 and 731-732, installed in 1995, with a maximum capacity of 55.8 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.01 gallons per unit, with emissions exhausting to stacks 134, 135, 136, 137, respectively.
  - (3) Four (4) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 733-734, 735-736, 737-738 and 739-740, installed in 1996, with a maximum capacity of 55.8 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.01 gallons per unit, with emissions exhausting to stacks 138, 139, 140 and 141, respectively.
- (e) Three (3) SICME model NEMG gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 601-612, 613-624 and 669-680, installed in 1995, with a maximum capacity of 195.12 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.015 gallons per unit, with emissions exhausting to stacks 101, 100 and 87 respectively.
- (f) Eight (8) MAG HES-2 electric wire enameling ovens with internal thermal oxidizers, identified as emission units 741, 742, 743, 744, 745, 746, 747 and 748, installed in 1995, with a maximum 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 150, 151, 152, 153, 154, 155, 156 and 157, respectively.
- (g) Four (4) Weather-Rite V-22 gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 467/468/469/470, 475/476/477/478, 479, and 480, installed in 1995, with a maximum of 30.6 units per hour each, and maximum enamel usage of 0.146 gallons per unit, with emissions exhausting to stacks 148, 149, 67 and 68, respectively.
- (h) Four (4) Weather-Rite V-22 gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 445-447, 448-450, 461-463 and 464-466, installed in 1996, with a maximum of 30.6 units per hour each, and maximum enamel usage of 0.146 gallons per unit, with emissions exhausting to stacks 203, 204, 201, 202, respectively.

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

- (i) One (1) Weather-Rite V-26 gas fired wire enameling oven with internal thermal oxidizer, identified as emission units 405-406, constructed in 2007, with a maximum capacity of 24.0 units per hour each, and maximum enamel usage of 0.3091 gallons per unit, with emissions exhausting to stack 01.
- (j) Two (2) SICME model SEV electric wire enameling ovens with internal thermal oxidizers, identified as emission units 329-334 and 335-340, installed in 1996, with a maximum capacity of 57.96 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.05 gallons per unit, with emissions exhausting to stacks 144 and 145, respectively.
- (k) Four (4) SICME model SEM electric wire enameling ovens with an internal thermal oxidizer for control:
  - (1) Two (2) SICME model SEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 801-808 and 809-816, installed in 1996, with a maximum capacity of 174.2 units per hour each, and maximum enamel usage of 0.034 gallons per unit, with emissions exhausting to stacks 142 and 143, respectively.
  - (2) Two (2) SICME model SEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 817-824 and 825-832, installed in 1997, with a maximum capacity of 174.2 units per hour each, and maximum enamel usage of 0.034 gallons per unit, with emissions exhausting to stacks 205 and 206, respectively.
- (l) Eight (8) MAG HES-5 electric wire enameling ovens with internal thermal oxidizers, identified as emission units 833, 834, 835, 836, 837, 838, 839, and 840, installed in 1997, with a maximum capacity of 174.2 units per hour each, and maximum enamel usage of 0.034 gallons per unit, with emissions exhausting to stacks 207, 208, 209, 210, 211, 212, 213 and 214, respectively.
- (m) Two (2) SICME model SML electric wire enameling ovens with internal thermal oxidizers, identified as emission units 753 and 754, installed in 1997, with a maximum capacity of 40.8 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.026 gallons per unit, with emissions exhausting to stacks 217 and 218, respectively.
- (n) Eight (8) Sima electric wire enameling ovens with internal thermal oxidizers, identified as emission units 941 through 948, constructed in 2008, with a maximum total capacity of 153.12 units per hour, and maximum enamel usage (including basecoat and topcoat) of 0.049 gallons per unit, with emissions exhausting to stacks 219 through 226.
- (o) One (1) MAG HES5B identified as emission unit 951-958 (vents 235-242 and 381-388) and two (2) MAG HES5 electric magnet wire enameling systems identified as emission units 961-968 (vents 243-250 and 397-404), and 971-978 (vent 227-234 and 365-373) respectively, each with eight (8) ovens with internal thermal oxidizers, each constructed in 2009, with a maximum total capacity of 149.1, 167.4, and 167.4 units per hour respectively, and maximum enamel usage of 62.4, 50.3, and, 50.3 lb/hr, respectively.
- (p) Twelve (12) MAG VZ enameling ovens with internal thermal oxidizers, identified as units 341-352, installed in 2011, with a maximum capacity of 103.7 units per hour and maximum enamel usage of 95.0 gallons per hour, with emissions exhausting to stacks 251-262.

(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 VOC Limitation - Magnet Wire Coating Operations [326 IAC 8-2-8]

- (a) Pursuant to 326 IAC 8-2-8 (Magnet Wire Coating Operations), the owner or operator shall not allow the discharge into the atmosphere of VOC in excess of 1.7 pounds of VOC per gallon of coating, excluding water, delivered to the coating applicator from magnet wire coating operations.
- (b) Pursuant to 326 IAC 8-1-2(b), the enameling process lines VOC emission shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon coating solids, allowed in (a).

The equivalency was determined by the following equation:

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

Where

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

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

- (c) The pounds of VOC per gallon of coating solids shall be limited to less than 2.21, where 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.
- (d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the catalytic or thermal oxidizers shall be no less than the equivalent overall control 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 oxidizers controlling the magnet wire ovens shall be equal to or greater than 98.5%.

## Compliance Determination Requirements

### D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2]

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

### D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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In order to demonstrate compliance with Conditions D.0.1, D.0.2, and D.3.1, the Permittee shall conduct performance tests to verify VOC and HAP control efficiency as listed 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 performance test to verify VOC and/or HAP control efficiency within ninety (90) days of startup of that oven.

- (a) The Permittee shall conduct a performance test to verify the VOC control efficiency for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 741, 742, 743, 744, 745, 746, 747 or 748. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be completed on or before 11/27/2012 and repeated at least once every five (5) years from the date of the latest valid compliance demonstration.
- (b) The Permittee shall conduct a performance test to verify the VOC control efficiency for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 595-596, 597-598, 599-600, 725-726, 727-728, 729-730, 731-732, 733-734, 735-736, 737-738 or 739-740. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be completed on or before 05/09/2015 and repeated at least once every five (5) years from the date of the latest valid compliance demonstration.
- (c) The Permittee shall conduct a performance test to verify the VOC control efficiency for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 801-808, 809-816, 817-824 or 825-832. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be completed on or before 11/16/2012 and repeated at least once every five (5) years from the date of the latest valid compliance demonstration.
- (d) The Permittee shall conduct a performance test to verify the VOC control efficiency for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 833, 834, 835, 836, 837, 838, 839 840, 941, 942, 943, 944, 945, 946, 947, 948, 951-958, 961-968, and 971-978. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be

completed on or before 04/13/2016 and repeated at least once every five (5) years from the date of the latest valid compliance demonstration.

- (e) The Permittee shall conduct a performance test to verify the VOC control efficiency for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 753 or 754. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be completed on or before 04/15/2016 and repeated at least once every five (5) years from the date of the latest valid compliance demonstration.
- (f) The Permittee shall conduct a performance test to verify the VOC control efficiency for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 601-612, 613-624 or 669-680. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be completed on or before 07/09/2013 and repeated at least once every five (5) years from the date of the latest valid compliance demonstration.
- (g) The Permittee shall conduct a performance test to verify the VOC control efficiency for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 467/468/469/470, 475/476/477/478, 479, 480, 445-447, 448-450, 461-463, 464-466 and 405-406. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be completed on or before 08/03/2012 and repeated at least once every five (5) years from the date of the latest valid compliance demonstration.
- (h) The Permittee shall conduct a performance test to verify the VOC control efficiency for the internal thermal oxidizer using methods approved by the Commissioner. Stack testing shall be performed in accordance with 326 IAC 3-6. The test shall be performed on one of the following ovens: 329-334, 341-352 or 335-340. The oven tested shall be the oven in which the longest amount of time has elapsed since its previous test. This test shall be completed on or before 12/19/2012 and repeated at least once every five (5) years from the date of the latest valid compliance demonstration.
- (i) Before using a coating that would lead to a higher VOC loading in pounds per hour than what was used during the stack tests required in (a), (b), and (c) above, the Permittee shall conduct a performance test to verify VOC control efficiency for thermal oxidizers using methods approved by the Commissioner.
- (j) For a higher VOC content coating than that used during the stack tests in (a), (b), and (c) above, the following procedure shall be followed:
  - (1) Calculate the new maximum VOC loading ( $L_{new}$ ) for the higher VOC content enamel;
  - (2) Calculate the current maximum VOC loading ( $L_{current}$ );
  - (3) If  $L_{new}$  is lower than  $L_{current}$ , Permittee shall be allowed to use the higher VOC content enamel.
- (k) The Permittee shall perform HAP testing of the following oven groups, utilizing methods as approved by the Commissioner, for the HAP used at the source that has the lowest destruction efficiency, as estimated by the manufacturer and approved by IDEM. This test shall be repeated at least once every five (5) years from the date of the latest valid

compliance demonstration. Stack testing shall be performed in accordance with 326 IAC 3-6. HAP testing shall be conducted on:

- (1) On or before 08/09/2012, one of the following ovens: 625-632U, 625-632L, (listed in Section D.2), 595-596, 597-598, 599-600, 725-726, 727-728, 729-730, 731-732, 733-734, 735-736, 737-738, 739-740, 329-334, 335-340, 341-352, 801-808, 809-816, 817-824, 825-832, 753, 754, 741, 742, 743, 744, 745, 746, 747, 748, 833, 834, 835, 836, 837, 838, 839, 840, 941, 942, 943, 944, 945, 946, 947, 948, 951-958, 961-968, and 971-978 (listed in Section D.3). The oven tested shall be the one for which the longest amount of time has elapsed since its previous test.
  - (2) On or before 08/03/2012, one of the following ovens: 467/468/469/470, 475/476/477/478, 479, 480, 445-447, 448-450, 461-463, 464-466, and 405-406. The oven tested shall be the one for which the longest amount of time has elapsed since its previous test.
- (n) For a higher HAP content coating than that used during the stack tests in (n) above, the following procedure shall be followed:
- (1) Calculate the new maximum HAP loading ( $L_{new}$ ) for the higher VOC content enamel;
  - (2) Calculate the current maximum HAP loading ( $L_{current}$ );
  - (3) If  $L_{new}$  is lower than  $L_{current}$ , Permittee shall be allowed to use the same destruction efficiency for calculations for the higher HAP content enamel.

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

#### **D.3.4 Thermal Oxidizer Operation**

- 
- (a) Until the latest approved stack test results are available for ovens 741, 742, 743, 744, 745, 746, 747 and 748, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 992 degrees Fahrenheit.
  - (b) Until the latest approved stack test results are available for ovens 595-596, 597-598, 599-600, 725-726, 727-728, 729-730, 731-732, 733-734, 735-736, 737-738 and 739-740, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1150 degrees Fahrenheit.
  - (c) Until the latest approved stack test results are available for ovens 801-808, 809-816, 817-824 and 825-832, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1149 degrees Fahrenheit.
  - (d) Until the latest approved stack test results are available for ovens 833, 834, 835, 836, 837, 838, 839, 840, 951-958, 961-968, and 971-978, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1132 degrees Fahrenheit.
  - (e) Until the latest approved stack test results are available for ovens 753 and 754, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature of 1116 degrees Fahrenheit.
  - (f) Until the latest approved stack test results are available for ovens 601-612, 613-624 and 669-680, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1410 degrees Fahrenheit.

- (g) Until the latest approved stack test results are available for ovens 405-406, 445-447, 448-450, 461-463, 464-466, 467/468/469/470, 475/476/477/478, 479 and 480, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1376 degrees Fahrenheit.
- (h) Until the latest approved stack test results are available for ovens 329-334, 335-340, and 341-352, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1151 degrees Fahrenheit.
- (i) Until the latest approved stack test results are available for ovens identified as 941 through 948, the Permittee shall maintain the internal thermal oxidizers' 3 hour average temperature at or above 1050 degrees Fahrenheit.
- (j) The Permittee shall determine the 3 hour block average minimum temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.3.1, as approved by IDEM.
- (k) In order to demonstrate compliance with Condition D.3.1, from the date of the approved stack test results are available, the Permittee shall maintain the thermal oxidizer at or above the 3 hour block average minimum temperature as observed during the compliant stack test to maintain an overall control efficiency of not less than ninety eight and five-tenths percent (98.5%) of volatile organic compound (VOC).

#### D.3.5 Parametric Monitoring

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- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature of the thermal oxidizer. For the purposes of this condition, continuous monitoring shall mean no less often than once per fifteen (15) minutes. The output from this monitoring system and the three hour average temperatures shall be recorded whenever the thermal oxidizer is in operation.
- (b) If the primary continuous monitoring system is not in operation, the oxidizer temperature will be recorded using some manner of secondary system, such as with back-up electro-mechanical hardware or manually if necessary. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of the thermal oxidizer. Continuous monitoring shall mean no less often than once per fifteen (15) minutes.
- (c) The oxidizer shall operate such that if the three-hour average temperature falls below the 3 hour block average minimum required temperature (setpoint) as determined by the latest stack test, corrective actions shall be taken to return the thermal oxidizer to at least the required minimum temperature setpoint within 15 minutes. Corrective action must return oxidizer temperature to or above the minimum setpoint within thirty (30) minutes of the corrective action, or the enamel flow to the oven shall be shut off. Failure to take corrective action or failure to shut off the enamel flow as stated above shall be considered a deviation from this permit.
- (d) All actions described in paragraph (c) above must be taken in accordance with Condition C.14 - Response to Excursions or Exceedances and failure to take action consistent with Condition C.14 - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

### **D.3.6 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.3.1 and D.3.4, the Permittee shall maintain the following records:
  - (1) The VOC content of each coating, solvent, lubricant and cleanup solvent used. Records shall include purchase orders, invoices, "as supplied" and "as applied" VOC data sheets from the manufacturer, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The continuous temperature records and 3 hour average temperature records.
- (b) All records shall be maintained in accordance with Section C – General Record Keeping Requirements of this permit.

## SECTION D.4 FACILITY OPERATION CONDITIONS

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

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

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

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

#### D.4.1 Particulate [326 IAC 6-2-4]

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

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

Where:

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Rea Magnet Wire Company  
Source Address: 2800 Concord Road, Lafayette, Indiana 47909  
Part 70 Permit No.: T157-30327-00032

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE AND ENFORCEMENT 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  
Source Address: 2800 Concord Road, Lafayette, Indiana 47909  
Part 70 Permit No.: T157-30327-00032

**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 <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

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

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance and Enforcement Branch**

**Part 70 Quarterly Report**

Source Name: Rea Magnet Wire Company  
Source Address: 2800 Concord Road, Lafayette, Indiana 47909  
Part 70 Permit No.: T157-30327-00032  
Facility: All magnet wire ovens  
Parameter: Single and combined HAPs: Total emissions, including coatings, solvents, and lubricants.  
Limit: Less than 9.5 tons and 24.0 tons of any single HAP and combined HAPs respectively per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

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

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance and Enforcement Branch**

**Part 70 Quarterly Report**

Source Name: Rea Magnet Wire Company  
Source Address: 2800 Concord Road, Lafayette, Indiana 47909  
Part 70 Permit No.: T157-30327-00032  
Facility: Source-wide emissions  
Parameter: VOC: Total emissions, including coatings, solvents, and lubricants, and emissions from insignificant activities  
Limit: Less than 250 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

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

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

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

Attach a signed certification to complete this report.

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

Source Name: Rea Magnet Wire Company  
 Source Address: 2800 Concord Road, Lafayette, Indiana 47909  
 Part 70 Permit No.: T157-30327-00032

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

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

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

Form Completed by: \_\_\_\_\_

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

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

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

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

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

**Source Background and Description**

Source Name: Rea Magnet Wire Company  
Source Location: 2800 Concord Road, Lafayette, Indiana 47909  
County: Tippecanoe  
SIC Code: 3357  
Operation Permit Renewal No.: T157-30372-00032  
Permit Reviewer: Madhurima Moulik

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Rea Magnet Wire Company relating to the operation of a stationary magnet wire coating operation. On March 10, 2011, Rea Magnet Wire Company submitted an application to the OAQ requesting to renew its operating permit. Rea Magnet Wire Company was issued a Part 70 Operating Permit T157-17638-00032 on December 12, 2006.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

- (a) Three (3) MOCO wire enameling ovens with internal catalytic oxidizers, identified as emissions units 417-418, 421-424 and 425-428, installed prior to January 1, 1980, with a maximum capacity of 54.0 units per hour each, and maximum enamel usage rate of 0.15 gallons per unit, with emissions controlled by add-on thermal incinerators, and exhausting to stacks 5, 6 and 7, respectively.
- (b) Four (4) wire enameling ovens with internal catalytic oxidizers and add-on thermal incinerators for control:
  - (1) Three (3) GEM gas fired wire enameling ovens, identified as emissions units 101-110, 433-436 and 437-440, installed in 1982, with a maximum capacity rating of 67.2 units per hour each, and maximum enamel usage rate of 0.12 gallon per unit, with emissions controlled by add-on thermal incinerators, and exhausting to stacks 1, 8, 9 and 10 respectively.
  - (2) One (1) GEI electric wire enameling oven, identified as emissions unit 441-444, installed in 1986, with a maximum capacity of 40.3 units per hour each, and maximum enamel usage rate of 0.10 gallons per unit, with emissions controlled by an add-on thermal incinerator, and exhausting to stack 51.
- (c) Two (2) SICME model NEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 625-632U and 625-632L, installed in 1986, with a maximum capacity of 48.2 units per hour each, and maximum enamel usage (including basecoat and topcoat) 0.04 gallons per unit, with emissions exhausting to stacks 52 and 69, respectively.
- (d) The following SICME model SEL electric wire enameling ovens:

- (1) Three (3) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 595-596, 597-598 and 599-600, installed in 1994, with a maximum capacity of 19.56 units per hour each, and maximum enamel usage (including base coat and top coat) of 0.03 gallons per unit, with emissions exhausting to stacks 131, 132 and 133, respectively.
- (2) Four (4) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 725-726, 727-728, 729-730 and 731-732, installed in 1995, with a maximum capacity of 55.8 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.01 gallons per unit, with emissions exhausting to stacks 134, 135, 136, 137, respectively.
- (3) Four (4) SICME model SEL electric wire enameling ovens with internal thermal oxidizers, identified as emission units 733-734, 735-736, 737-738 and 739-740, installed in 1996, with a maximum capacity of 55.8 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.01 gallons per unit, with emissions exhausting to stacks 138, 139, 140 and 141, respectively.
- (e) Three (3) SICME model NEMG gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 601-612, 613-624 and 669-680, installed in 1995, with a maximum capacity of 195.12 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.015 gallons per unit, with emissions exhausting to stacks 101, 100 and 87 respectively.
- (f) Eight (8) MAG HES-2 electric wire enameling ovens with internal thermal oxidizers, identified as emission units 741, 742, 743, 744, 745, 746, 747 and 748, installed in 1995, with a maximum 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 150, 151, 152, 153, 154, 155, 156 and 157, respectively.
- (g) Four (4) Weather-Rite V-22 gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 467/468/469/470, 475/476/477/478, 479, and 480, installed in 1995, with a maximum of 30.6 units per hour each, and maximum enamel usage of 0.146 gallons per unit, with emissions exhausting to stacks 148, 149, 67 and 68, respectively.
- (h) Four (4) Weather-Rite V-22 gas fired wire enameling ovens with internal thermal oxidizers, identified as emission units 445-447, 448-450, 461-463 and 464-466, installed in 1996, with a maximum of 30.6 units per hour each, and maximum enamel usage of 0.146 gallons per unit, with emissions exhausting to stacks 203, 204, 201, 202, respectively.
- (i) One (1) Weather-Rite V-26 gas fired wire enameling oven with internal thermal oxidizer, identified as emission unit 405-406, constructed in 2007, with a maximum capacity of 24.0 units per hour and maximum enamel usage of 0.3091 gallons per unit, with emissions exhausting through stack 01.
- (j) Four (4) SICME model SEM electric wire enameling ovens with an internal thermal oxidizer for control:
  - (1) Two (2) SICME model SEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 801-808 and 809-816, installed in 1996, with a maximum capacity of 174.2 units per hour each, and maximum enamel usage of 0.034 gallons per unit, with emissions exhausting to stacks 142 and 143, respectively.

- (2) Two (2) SICME model SEM electric wire enameling ovens with internal thermal oxidizers, identified as emission units 817-824 and 825-832, installed in 1997, with a maximum capacity of 174.2 units per hour each, and maximum enamel usage of 0.034 gallons per unit, with emissions exhausting to stacks 205 and 206, respectively.
- (k) Eight (8) MAG HES-5 electric wire enameling ovens with internal thermal oxidizers, identified as emission units 833, 834, 835, 836, 837, 838, 839, and 840, installed in 1997, with a maximum capacity of 174.2 units per hour each, and maximum enamel usage of 0.034 gallons per unit, with emissions exhausting to stacks 207, 208, 209, 210, 211, 212, 213 and 214, respectively.
- (l) Two (2) SICME model SEV electric wire enameling ovens with internal thermal oxidizers, identified as emission units 317-322 and 323-328, installed in 1996, with a maximum capacity of 57.96 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.05 gallons per unit, with emissions exhausting to stacks 144 and 145, respectively.
- (m) Two (2) SICME model SML electric wire enameling ovens with internal thermal oxidizers, identified as emission units 753 and 754, installed in 1997, with a maximum capacity of 40.8 units per hour each, and maximum enamel usage (including basecoat and topcoat) of 0.026 gallons per unit, with emissions exhausting to stacks 217 and 218, respectively.
- (n) Eight (8) Sima electric wire enameling ovens with internal thermal oxidizers, identified as emission units 941 through 948, constructed in 2008, with a maximum total capacity of 153.12 units per hour, and maximum enamel usage (including basecoat and topcoat) of 0.049 gallons per unit, with emissions exhausting to stacks 219 through 226.
- (o) One (1) MAG HES5B identified as emission unit 951-958 (vents 235-242 and 381-388) and two (2) MAG HES5 electric magnet wire enameling systems identified as emission units 961-968 (vents 243-250 and 397-404), and 971-978 (vent 227-234 and 365-373) respectively, each with eight (8) ovens with internal thermal oxidizers, each constructed in 2009, with a maximum total capacity of 149.1, 167.4, and 167.4 units per hour respectively, and maximum enamel usage of 62.4, 50.3, and, 50.3 lb/hr, respectively.
- (p) Twelve (12) MAG VZ enameling ovens with internal thermal oxidizers, identified as units 341-352, installed in 2011, with a maximum capacity of 103.7 units per hour and maximum enamel usage of 95.0 gallons per hour, with emissions exhausting to stacks 251-262.

#### Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
  - (1) One (1) 5.0 MMBtu/hr natural gas fired boiler, installed in 1996. [326 IAC 6-2-4]
  - (2) One (1) 5.0 MMBtu/hr natural gas fired boiler, installed in 1997. [326 IAC 6-2-4]
- (b) One (1) superconductor stripping operation, identified as SS1, constructed in 2009, with a maximum stripping capacity of 900 feet of wire per hour and 0.193 lb/hr of enamel, exhausting to vent 33.

- (c) One (1) Samsco evaporator, identified as 700-316, permitted in 2009, for the treatment of wastewater at the rate of 504 lb/hr.

#### **Existing Approvals**

Since the issuance of the Part 70 Operating Permit T157-17638-00032 on December 12, 2006, the source has constructed or has been operating under the following additional approvals:

- (a) Minor Source Modification No. 157-25239-00032 issued on December 4, 2007;
- (b) Significant Permit Modification No 157-24239-00032 issued December 5, 2007;
- (c) Minor Permit Modification No. 157-25224-00032 issued on January 28, 2008;
- (d) Minor Source Modification No. 157-25953-00032 issued on March 3, 2008;
- (e) Minor Permit Modification No. 157-25971-00032 issued on April 28, 2008;
- (f) Administrative Amendment No. 157-26956-00032 issued on September 16, 2008;
- (g) Minor Source Modification No. 157-27971-00032 issued on June 23, 2009;
- (h) Minor Permit Modification No. 157-27992-00032 issued on August 14, 2009;
- (i) Administrative Amendment No. 157-28452-00032 issued on October 1, 2009;
- (j) Significant Source Modification No. 157-29772-00032 issued on January 14, 2011; and
- (k) Minor Permit Modification No. 157-29867-00032 issued on February 22, 2011.

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

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

The Permittee has submitted the following information to justify the internal thermal oxidizers at this source as integral to the process:

- (a) The heat requirement of the magnet wire curing ovens is, in part, satisfied by heat generated from the combustion of the VOCs in the thermal oxidizers. Therefore, the thermal oxidizers are necessary for curing the coating applied to the magnet wires. The process could not operate without the oxidizers and the oxidizers serve a primary purpose other than pollution control.
- (b) The ovens cannot produce salable wire without the oxidizers functioning at an efficiency of at least 90%.

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

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Emission Calculations**

See Appendix A of this document for detailed emission calculations.

**County Attainment Status**

The source is located in Tippecanoe County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> 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 PM2.5.	

- (a) **Ozone Standards**  
 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 and NOx emissions are considered when evaluating the rule applicability relating to ozone. Tippecanoe County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
  
- (b) **PM2.5**  
 Tippecanoe County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> 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.
  
- (c) **Other Criteria Pollutants**  
 Tippecanoe County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**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.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	0.1
PM <sub>10</sub>	0.3
PM <sub>2.5</sub>	0.3
SO <sub>2</sub>	0.03
VOC	> 250
CO	4.3
NO <sub>x</sub>	4.3
CO <sub>2</sub> e	5,288
Single HAP	< 10
Total HAP	> 25

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Worst Single HAP	Total HAP
Magnet wire ovens	---	---	---	---	---	<250	---	<10	<25
Natural gas fired combustion units	0.1	0.3	0.3	0.03	4.3	---	4.3	---	---
Total PTE of Entire Source	0.1	0.3	0.3	0.03	4.3	<250	4.3	<10	<25
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
CO <sub>2</sub> e (tons per year) = 5, 288 PSD Major Source Threshold = 100,000 tons per year									
--- negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

- (a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant (other than CO<sub>2</sub>e) are less than two hundred fifty (<250) tons per year, and it is not in one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for PSD because the emissions of CO<sub>2</sub>e are less than one-hundred thousand (100,000) tons per year.

**Federal Rule Applicability**

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
  - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
  - (2) is subject to an emission limitation or standard for that pollutant; and
  - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following facilities have VOC potential to emit (uncontrolled) greater than the major source threshold of 100 tons per year, and use a control device (thermal or catalytic oxidizers) to comply with an emission limitation for VOC:

401-404, 429-432, 433-436, 437-440, 441-443, 417-418, 421-424, 425-428, 445-447, 448-450, 461-463, 464-466, 467/468/469/470, 475/476/477/478, 479, 480, 595-596, 597-598, 599-600, 701-702, 703-704, 705-706, 707-708, 709-710, 711-712, 713-714, 715-716, 725-726, 727-728, 729-730, 731-732, 733-734, 735-736, 737-738, 739-740, 601-612, 613-624,

669-680, 625-632U, 625-632L, 633-644U, 633-644L, 645-656U, 645-656L, 657-668, 301-308, 309-316, 317-322, 323-328, 329-334, 335-340, 341-352, 801-808, 809-816, 817-824, 825-832, 741, 742, 743, 744, 745, 746, 747, 748, 753, 754, 833, 834, 835, 836, 837, 838, 839 and 840.

The controlled VOC emissions of these units are less than 100 tons per year, each. Therefore, these facilities are classified as "other" units with respect to CAM and are subject to the requirements of 40 CFR Part 64. Pursuant to 40 CFR 64.5(b), the Permittee is required to submit the necessary information required by 40 CFR 64.4 as part of the Part 70 renewal application. The Permittee has satisfied this requirement at the time of application for the first renewal no. T157-17638-00032.

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

- (1) Operate the internal thermal oxidizers and the add-on thermal incinerators at all times that the ovens are in operation.
  - (2) Maintain the temperature of the ovens at or above the minimum temperature specified in the permit or the most recent stack tests.
  - (3) Automatically monitor oven temperature and maintain an electronic archive of all temperature readings.
  - (4) Investigate the cause of abnormal readings and make repairs as necessary.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) This magnet wire coating operation is not subject to the requirements under the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Operations (40 CFR 63, Subpart MMMM). In order to limit the source-wide emissions of a single HAP to less than ten (10) tons per year, and a combination of HAPs to less than twenty-five (25) tons per year, the Permittee shall limit the usage of HAP in the magnet wire ovens as follows:
- (1) The total usage of coatings, solvents, lubricants and cleanup solvents in all of the magnet wire ovens at this source shall be limited such that the single HAP emissions are each less than nine and five-tenths (9.5) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit, in conjunction with the potential to emit of a single HAP from insignificant activities at the source shall limit the source-wide emissions of any single HAP to less than ten (10) tons per year.
  - (2) The total usage of coatings, solvents, lubricants and cleanup solvents in all of the magnet wire ovens at this source shall be limited such that the combined HAP emissions are less than twenty-four (24.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit, in conjunction with the potential to emit of a combination of HAPs from insignificant activities at the source shall limit the source-wide emissions of any combination of HAPs to less than twenty-five (25) tons per year.

Compliance with these limits, in conjunction with the single and combination HAPs from other emissions units at this source, including insignificant activities, shall ensure that the source-wide emissions of single and combination HAPs remain below 10 and 25 tons per year, making the source a minor source for HAPs.

### State Rule Applicability - Entire Source

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

The VOC usage at the magnet wire ovens shall be limited such that the emissions from all magnet wire ovens, in conjunction with VOC emissions from all other activities at this source, including the potential to emit of VOCs from insignificant activities, are less than 250 tons per twelve consecutive month period, with compliance determined at the end of each month. Compliance with the above requirements shall ensure that the source-wide VOC emissions are limited to less than 250 tons per twelve consecutive month period, rendering the requirements of 326 IAC 2-2 not applicable.

The direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions for the entire source are less than the major source levels. Therefore, 326 IAC 2-2 does not apply.

#### 326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

#### 326 IAC 1-5-2 (Emergency Reduction Plans)

The source is subject to 326 IAC 1-5-2.

#### 326 IAC 2-6 (Emission Reporting)

This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM<sub>10</sub> is less than 250 tons per year; and the potential to emit of CO, NO<sub>x</sub>, and SO<sub>2</sub> is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2011, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

This source is subject to the opacity limitations specified in 326 IAC 5-1-2.

#### 326 IAC 6.5 (PM Limitations Except Lake County)

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

### State Rule Applicability – Individual Facilities

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

The operation of the magnet wire coating ovens at this facility will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

#### 326 IAC 6-2-4 (Particulate Matter)

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

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

Where:

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

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

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

Pursuant to 326 IAC 8-2-8 (Magnet Wire Coating Operations), the owner or operator of the following magnet wire ovens shall not allow the discharge into the atmosphere of VOC in excess of 1.7 pounds of VOC per gallon of coating, excluding water, delivered to the coating applicator from magnet wire coating operations:

101-110, 329-334, 335-340, 341-352, 405-406, 433-436, 437-440, 441-444, 445-447, 448-450, 461-463, 464-466 467/468/469/470, 475/476/477/478, 479, 480, 595-596, 597-598, 599-600, 625-632U, 625-632L, 601-612, 613-624, 669-680, 725-726, 727-728, 729-730, 731-732, 733-734, 735-736, 737-738, 739-740, 741, 742, 743, 744, 745, 746, 747, 748, 753, 754, 801-808, 809-816, 817-824, 825-832, 833, 834, 835, 836, 837, 838, 839, 840, 941, 948, 951-958, 961-968, 971-978.

- (a) 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:

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

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 = 28.2 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.

### 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 monitoring requirements applicable to this source are as follows:

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature of the thermal oxidizer. For the purposes of this condition, continuous monitoring shall mean no less often than once per fifteen (15) minutes. The output from this monitoring system and the three hour average temperatures shall be recorded whenever the thermal oxidizer is in operation.
- (b) If the primary continuous monitoring system is not in operation, the oxidizer temperature will be recorded using some manner of secondary system, such as with back-up electro-mechanical hardware or manually if necessary. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of the thermal oxidizer. Continuous monitoring shall mean no less often than once per fifteen (15) minutes.
- (c) The oxidizer shall operate such that if the three-hour average temperature falls below the 3 hour block average minimum required temperature (setpoint) as determined by the latest stack test, corrective actions shall be taken to return the thermal oxidizer to at least the required minimum temperature setpoint within 15 minutes. Corrective action must return oxidizer temperature to or above the minimum setpoint within thirty (30) minutes of the corrective action, or the enamel flow to the oven shall be shut off. Failure to take corrective action or failure to shut off the enamel flow as stated above shall be considered a deviation from this permit.
- (d) All actions described in paragraph (c) above must be taken in accordance with Condition C.14 - Response to Excursions or Exceedances and failure to take action consistent with Condition C.14 - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (e) From the date of issuance of the Part 70 permit until the approved stack test results are available, the Permittee shall operate the thermal oxidizers' 3 hour average temperature at or above 1360 deg F.

- (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 Condition D.0.1, as approved by IDEM.
- (g) From the date of the approved stack test results are available, the Permittee shall operate the thermal oxidizers at or above the 3 hour block average minimum temperature as observed during the compliant stack test to maintain an overall control efficiency of not less than ninety eight and five-tenths percent (98.5%) of volatile organic compound (VOC) in order to demonstrate compliance with Condition D.0.1.
- (h) Until the latest approved stack test results are available for ovens 101-110, 433-436, 437-440 and 441-444, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1150 degrees Fahrenheit.
- (i) Until the latest approved stack test results are available for ovens 625-632U, 625-632L, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature of 1154 degrees Fahrenheit.
- (j) The Permittee shall determine the 3 hour block average minimum temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.2.1, as approved by IDEM.
- (k) In order to demonstrate compliance with Condition D.2.1, from the date of the approved stack test results are available, the Permittee shall maintain the thermal oxidizer at or above the 3 hour block average minimum temperature as observed during the compliant stack test to maintain an overall control efficiency of not less than ninety eight and five-tenths percent (98.5%) of volatile organic compound (VOC).
- (l) Until the latest approved stack test results are available for ovens 741, 742, 743, 744, 745, 746, 747 and 748, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 921 degrees Fahrenheit.
- (m) Until the latest approved stack test results are available for ovens 725-726, 727-728, 729-730, 731-732, 733-734, 735-736, 737-738 and 739-740, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1050 degrees Fahrenheit.
- (n) Until the latest approved stack test results are available for ovens 801-808, 809-816, 817-824 and 825-832, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1090 degrees Fahrenheit.
- (o) Until the latest approved stack test results are available for ovens 833, 834, 835, 836, 837, 838, 839 and 840, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 965 degrees Fahrenheit.
- (p) Until the latest approved stack test results are available for ovens 753 and 754, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature of 1110 degrees Fahrenheit.
- (q) Until the latest approved stack test results are available for ovens 601-612, 613-624 and 669-680, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1350 degrees Fahrenheit.
- (r) Until the latest approved stack test results are available for ovens 445-447, 448-450, 461-463 and 464-466, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1375 degrees Fahrenheit.

- (s) Until the latest approved stack test results are available for ovens 329-334 and 335-340, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1200 degrees Fahrenheit.
- (t) Until the latest approved stack test results are available for ovens 595-596, 597-598 and 599-600, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1199 degrees Fahrenheit.
- (u) Until the latest approved stack test results are available for ovens 467/468/469/470, 475/476/477/478, 479, and 480, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1375 degrees Fahrenheit.
- (v) Until the latest approved stack test results are available for oven, identified as 405-406, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1300 degrees Fahrenheit.
- (w) Until the latest approved stack test results are available for ovens identified as 941 through 948, the Permittee shall maintain the internal thermal oxidizers' 3 hour average temperature at or above 1050 degrees Fahrenheit.
- (x) The Permittee shall determine the 3 hour block average minimum temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.3.1, as approved by IDEM.
- (y) Until the latest approved stack test results are available for ovens 951-958, 961-968, and 971-978, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1080 degrees Fahrenheit.
- (z) Until the latest approved stack test results are available for ovens 341-352, the Permittee shall maintain the thermal oxidizer's 3 hour average temperature at or above 1080 degrees Fahrenheit.
- (aa) In order to demonstrate compliance with Condition D.3.1, from the date of the approved stack test results are available, the Permittee shall maintain the thermal oxidizer at or above the 3 hour block average minimum temperature as observed during the compliant stack test to maintain an overall control efficiency of not less than ninety eight and five-tenths percent (98.5%) of volatile organic compound (VOC).

These monitoring conditions are necessary because the thermal or catalytic oxidizers for the magnet wire ovens must operate properly to ensure compliance with 326 IAC 2-7 (Part 70), 326 IAC 8-2-8, 326 IAC 2-2, and 40 CFR 63, Subpart Mmmm.

<b>Recommendation</b>
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The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on March 10, 2011.

### Conclusion

The operation of this magnet wire coating operation shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T157-30327-00032.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Madhurima Moulik at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 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.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) 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.idem.in.gov](http://www.idem.in.gov)

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name: Rea Magnet Wire Company  
Address City IN Zip: 2800 Concord Road, Lafayette, Indiana 47909  
Permit Number: T157-30327-00032  
Plt ID: 157-00032  
Reviewer: Madhurima D. Moulik  
Date: 7/26/2011**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
10.0	1000	87.6

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.1	0.3	0.3	0.0	4.4	0.2	3.7

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

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

See page 2 for HAPs emissions calculations.

updated 7/11

**Appendix A: Emissions Calculations****Natural Gas Combustion Only****MM BTU/HR <100****HAPs Emissions****Company Name: Rea Magnet Wire Company****Address City IN Zip: 2800 Concord Road, Lafayette, Indiana 47909****Permit Number: T157-30327-00032****Plt ID: 157-00032****Reviewer: Madhurima D. Moulik****Date: 7/26/2011**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.198E-05	5.256E-05	3.285E-03	7.884E-02	1.489E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.190E-05	4.818E-05	6.132E-05	1.664E-05	9.198E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

See Page 3 for Greenhouse Gas calculations.

updated 7/11

**Appendix A: Emissions Calculations****Natural Gas Combustion Only****MM BTU/HR <100****Greenhouse Gas Emissions**

**Company Name:** Rea Magnet Wire Company  
**Address City IN Zip:** 2800 Concord Road, Lafayette, Indiana 47909  
**Permit Number:** T157-30327-00032  
**Plt ID:** 157-00032  
**Reviewer:** Madhurima D. Moulik  
**Date:** 7/26/2011

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	5,256	0.1	0.1
Summed Potential Emissions in tons/yr	5,256		
CO2e Total in tons/yr	5,288		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

updated 7/11

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

Company: Rea Magnet Wire Company  
 Address: 2800 Concord Road, Lafayette, Indiana 47909  
 Title V: T157-30327-00032  
 Reviewer: Madhurima D. Moulik  
 Date: 26-Jul-11

Potential to Emit  
 Before internal Thermal Oxidizers After Thermal Oxidizer

Oven Model	Oven ID Number	# Ovens	Material	Density (lbs/gal)	Weight Percent VOC (%)	Usage (gal/unit)	Maximum Throughput (unit/hour)	Type of Thermal Oxidizer	PTE VOC per oven (lbs/hr)	PTE VOC per oven (lbs/day)	Oxidizer Destruction Efficiency (%)	PTE VOC per oven (lbs/hr)	PTE VOC per oven (lbs/day)	PTE VOC per oven (tons/yr)	PTE VOC all ovens (tons/yr)
MOCO	417-418, 421-424,	3	Formvar 11313G-24	8.5	74.00%	0.14602	54	add-on+int	49.6	1190	98.50%	0.74	17.8	3.26	9.8
GEM	401-404, 429-432,	4	Worst Case Coating	8.58	76.00%	0.12344	67.2	internal+ad	54.1	1298.2	98.50%	0.81	19.47	3.55	14.2
GEI	441-444	1	Worst Case Coating	8.58	76.00%	0.10111	40.32	internal+ad	26.6	638	98.50%	0.4	9.57	1.75	1.75
NEM-8	625-632U, 625-632	2	Base Coat	8.7	64.00%	0.0269	48.24	internal	7.2	173.4	98.50%	0.11	2.6	0.47	0.95
			Top Coat Nylon	8.33	84.90%	0.0135	48.24	internal	4.6	110.5	98.50%	0.07	1.66	0.3	0.61
SEL	595-596, 597-598,	3	Base Coat Ester	9.27	64.00%	0.02379	19.56	internal	2.8	66.3	98.50%	0.04	0.99	0.18	0.54
			Top Coat Al	8.9	70.00%	0.00734	19.56	internal	0.9	21.5	98.50%	0.01	0.32	0.06	0.18
SEL	725-726, 727-728,	4	Base Coat Ester	9.27	64.00%	0.00781	55.8	internal	2.6	62.1	98.50%	0.04	0.93	0.17	0.68
			Top Coat Al	8.9	70.00%	0.00245	55.8	internal	0.9	20.4	98.50%	0.01	0.31	0.06	0.22
SEL	733-734, 735-736,	4	Base Coat Ester	9.27	64.00%	0.00781	55.8	internal	2.6	62.1	98.50%	0.04	0.93	0.17	0.68
			Top Coat Al	8.9	70.00%	0.00245	55.8	internal	0.9	20.4	98.50%	0.01	0.31	0.06	0.22
NEMG	601-612, 613-624,	3	Base Coat Ester	9.27	64.00%	0.0125	195.12	internal	14.5	347.3	98.50%	0.22	5.21	0.95	2.85
			Top Coat Al	8.9	70.00%	0.00388	195.12	internal	4.7	113.2	98.50%	0.07	1.7	0.31	0.93
MAG HES-2	741, 742, 743, 744,	8	Base Coat	8.65	72.00%	0.00547	93	internal	3.2	76	98.50%	0.05	1.14	0.21	1.67
			Top Coat Nylon	8.33	87.00%	0.00106	93	internal	0.7	17.1	98.50%	0.01	0.26	0.05	0.38
V-22	467/468/469/470, 4	4	Worst Case Coating	8.58	76.00%	0.14602	30.6	internal	29.1	699.3	98.50%	0.44	10.49	1.91	7.66
									0	0					
V-22	445-447, 448-450,	4	Worst Case Coating	8.58	76.00%	0.14602	30.6	internal	29.1	699.3	98.50%	0.44	10.49	1.91	7.66
									0	0					
SEM	801-808, 809-816	2	Worst Case Coating	8.58	76.00%	0.0335	174.24	internal	38.1	913.5	98.50%	0.57	13.7	2.5	5
									0	0					
SEM	817-824, 825-832	2	Worst Case Coating	8.58	76.00%	0.0335	174.24	internal	38.1	913.5	98.50%	23.64	0.99	0.01	0.35
									0	0	0.00%	0	0.99	0	0
MAG HES-5	833, 834, 835, 836	8	Base Coat Ester	9.27	64.00%	0.01709	25.08	internal	2.5	61	98.50%	0.04	0.92	0.17	1.34
			Int Coat Al	8.8	65.00%	0.00288	25.08	internal	0.4	9.9	98.50%	0.01	0.15	0.03	0.22
			Bond Coat	8.92	82.00%	0.01565	25.08	internal	2.9	68.9	98.50%	0.04	1.03	0.19	1.51
SML	753, 754	2	Base Coat Ester	9.27	64.00%	0.0197	40.8	internal	4.8	114.4	98.50%	0.07	1.72	0.31	0.63
			Top Coat Al	8.9	70.00%	0.00609	40.8	internal	1.5	37.2	98.50%	0.02	0.6	0.1	0.2

													TSD App A Page 5 of 5		
Company: Rea Magnet Wire Company															
Address: 2800 Concord Road, Lafayette, Indiana 47909															
Title V: T157-30327-00032															
Reviewer: Madhurima D. Moulik															
Date: 26-Jul-11															
SIMA	941-948*	1	Base Coat	9.3	64.00%	0.0384	153.12	internal	35	839.9	98.50%	0.52	12.6	2.3	2.3
			Top Coat	8.9	70.00%	0.011	153.12	internal	10.5	251.8	98.50%	0.16	3.8	0.69	0.69
MAG-	951-958*	1	Base Coat	9.25	64.00%	0.0345	149.1	internal	30.5	730.9	98.50%	0.46	11	2	2
			Top Coat	8.9	70.00%	0.011	149	internal	10.2	245.1	98.50%	0.15	3.7	0.67	0.67
MAG-	961-968*	1	Base Coat	9.25	64.00%	0.0249	167.4	internal	24.7	592.2	98.50%	0.37	8.9	1.62	1.62
			Top Coat	8.9	70.00%	0.0081	167.4	internal	8.4	202.7	98.50%	0.13	3	0.56	0.56
MAG-	971-978*	1	Base Coat	9.25	64.00%	0.0249	167.4	internal	24.7	592.2	98.50%	0.37	8.9	1.62	1.62
			Top Coat	8.9	70.00%	0.0081	167.4	internal	8.4	202.7	98.50%	0.13	3	0.56	0.56
n-methyl 2-pyrrolidone	Stripping	1	solvent	8.56	100.00%	0.0225	0.9	NA	0.2	4.2	0.00%	0.17	4.2	0.76	0.76
Mono etanolamine	Stripping	1	solvent	8.43	100.00%	0.0076	0.9	NA	0.1	1.4	0.00%	0.06	1.4	0.25	0.25
MAG-VZ	341-352	12	1st coat	***					5.9	140.6	98.50%	0.09	2.1	0.39	4.62
			2nd coat	***					5.9	140.6	98.50%	0.09	2.1	0.39	4.62
			3rd coat	***					5.9	140.6	98.50%	0.09	2.1	0.39	4.62

The transfer efficiency for all wire coating operations is 100%. There is no particulate potential due to the magnet wire coating operations.

VOC PTE (controlled)(tpy) = 85.1

\* Total usage for the whole line combined

\*\*\* VOC emissions based on wire speed (ft/hr) and VOC used per foot

VOC PTE (uncontrolled) (tpy) 5672.269

Methodology

PTE VOC per oven (Before internal Oxidizers) (lbs/hr) = Density (lbs/gal) x Weight Percent VOC (%) x Usage (gal/unit) x Maximum Throughput (units/hr)

PTE VOC per oven (After internal Oxidizers) (lbs/hr) = Density (lbs/gal) x Weight Percent VOC (%) x Usage (gal/unit) x Maximum Throughput (units/hr) x (1- Destruction Efficiency(%))

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



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

## **SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED**

**TO:** Peter Von Stein  
Rea Magnet Wire Company, Inc.  
2800 Concord Road  
Lafayette, IN 47909

**DATE:** September 26, 2011

**FROM:** Matt Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

**SUBJECT:** Final Decision  
Part 70  
157-30327-00032

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
John Hake VP of Operations, Responsible Official  
Brandon Snoddy, Consultant  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

TO: Tippecanoe County Public Library

From: Matthew Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

**Applicant Name: Rea Magnet Wire Company**  
**Permit Number: 157-30327-00032**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	DPABST 9/26/2011 Rea Magnet Wire Company, Inc. 157- 30327-00032 (Final)		<b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Peter Von Stein Rea Magnet Wire Company, Inc. 2800 Concord Rd Lafayette IN 47909 (Source CAATS) (CONFIRM DELIVERY)									
2		John Hake VP of Operations- Round Rea Magnet Wire Company, Inc. 2800 Concord Rd Lafayette IN 47909 (RO CAATS)									
3		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)									
4		Tippecanoe County Commissioners 20 N 3rd St, County Office Building Lafayette IN 47901 (Local Official)									
5		Tippecanoe County Health Department 20 N. 3rd St Lafayette IN 47901-1211 (Health Department)									
6		Lafayette City Council and Mayors Office 20 North 6th Street Lafayette IN 47901-1411 (Local Official)									
7		Tippecanoe County Public Library 627 South Street Lafayette IN 47901-1470 (Library)									
8		Ms. Dorothy Whicker 2700 Bonny Lane Lafayette IN 47904 (Affected Party)									
9		Ms. Geneva Werner 3212 Longlois Drive Lafayette IN 47904-1718 (Affected Party)									
10		Mrs. Phyllis Owens 3600 Cypress Lane Lafayette IN 47905 (Affected Party)									
11		Mr. Jerry White 1901 King Eider Ct West Lafayette IN 47906 (Affected Party)									
12		Ms. Rose Filley 5839 Lookout Drive West Lafayette IN 47906 (Affected Party)									
13		Mr. William Cramer 128 Seminole Drive West Lafayette IN 47906 (Affected Party)									
14		Mr. Robert Kelley 2555 S 30th Street Lafayette IN 44909 (Affected Party)									
15		Brandon Snoddy M3V, LLC 11925 East 65th Street Indianapolis IN 46236 (Consultant)									

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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# Mail Code 61-53

IDEM Staff	DPABST 9/26/2011 Rea Magnet Wire Company, Inc.157- 30327-00032 (Final)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Mark 26545 CR 52 Nappanee IN 46550 (Affected Party)									
2											
3											
4											
5											
6											
7											
8											
9											
10											
11											
12											
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15											

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