PUBLIC NOTICE

Essex Furukawa Magnet Wire USA LLC has applied to the Tennessee Department of Environment and Conservation, Division of Air Pollution Control for renewal of their major source (Title V) operating permit subject to the provisions of Tennessee Air Pollution Control Regulations 1200-03-09-.02(11) (Title V Regulations). A major source operating permit is required by both the Federal Clean Air Act and Tennessee’s air pollution control regulations. However, it should be noted that this facility has a current major source operating permit.

The applicant is Essex Furukawa Magnet Wire USA LLC with a site address of 120 Southeast Parkway, Franklin, TN 37064. They have applied for renewal of their existing major source (Title V) operating permit for their magnet wire products manufacturing facility.

EPA has agreed to treat this draft Part 70 permit as a proposed Part 70 permit and to perform its 45-day review provided by the law concurrently with the public notice period. If any substantive comments are received, EPA’s 45-day review period will cease to be performed concurrently with the public notice period. In this case, EPA’s 45-day review period will start once the public notice period has been completed and EPA receives notification from the Tennessee Air Pollution Control Division that comments have been received and resolved. The status regarding EPA’s 45-day review of these permits and the deadline for submitting a citizen’s petition can be found at the following website address:

https://www.epa.gov/CAA-permitting/tennessee-proposed-title-v-permits"

Copies of the application materials and draft permit are available for public inspection during normal business hours at the following locations:

Nashville Environmental Field Office and Tennessee Department of Environment and Conservation
Division of Air Pollution Control Division of Air Pollution Control
711 R. S. Gass Blvd. William R. Snodgrass Tennessee Tower
Nashville, TN 37216 312 Rosa L. Parks Avenue, 15th Floor

Electronic copies of the draft permit and application materials are available by accessing the TDEC internet site located at:


Questions concerning the source(s) may be addressed to Sarosh Kaiser at (615) 532-0585 or by e-mail at sarosh.kaiser@tn.gov

Interested parties are invited to review these materials and comment. In addition, a public hearing may be requested at which written or oral presentations may be made. To be considered, written comments or requests for a public hearing must be received no later than 4:30 PM on April 11, 2022. To assure that written comments are received and addressed in a timely manner, written comments must be submitted using one of the following methods:

1. Mail, private carrier, or hand delivery: Address written comments to Ms. Michelle W. Owenby, Director, Division of Air Pollution Control, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue 15th Floor, Nashville, Tennessee 37243.

2. E-mail: Submit electronic comments to air.pollution.control@tn.gov.

A final determination will be made after weighing all relevant comments.

Individuals with disabilities who wish to review information maintained at the above-mentioned depositories should contact the Tennessee Department of Environment and Conservation ADA Coordinator, William R. Snodgrass Tennessee Tower, 312 Rosa L. Parks Avenue 22nd Floor, Nashville, TN 37243, 1-(866)-253-5827. Hearing impaired callers may use the Tennessee Relay Service, 1-(800)-848-0298.
STATE OF TENNESSEE  
AIR POLLUTION CONTROL BOARD  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
NASHVILLE, TENNESSEE 37243

OPERATING PERMIT (TITLE V) Issued Pursuant to Tennessee Air Quality Act

This permit fulfills the requirements of Title V of the Federal Clean Air Act (42 U.S.C. 7661a-7661e) and the federal regulations promulgated thereunder at 40 CFR Part 70. (FR Vol. 57, No. 140, Tuesday, July 21, 1992 p.32295-32312). This permit is issued in accordance with the provisions of paragraph 1200-03-09-02(11) of the Tennessee Air Pollution Control Regulations (TAPCR). The permittee has been granted permission to operate an air contaminant source in accordance with emissions limitations and monitoring requirements set forth herein.

Date Issued: DRAFT   
Date Expires: DRAFT   
Permit Number: 578641

Issued To: Essex Furukawa Magnet Wire USA LLC   
Installation Address: 120 Southeast Parkway Franklin

Installation Description:
Magnet Wire Products Manufacturing
94-0072-05: Lines 201-212
94-0072-06: Lines 301-306
94-0072-16: Lines 213-220
94-0072-17: Lines 313-317
94-0072-18: Lines 601-602
94-0072-22: Two Boilers

Facility ID: 94-0072

Renewal Application Due Date: Between ******* and *******

Primary SIC: 33

Information Relied Upon:
Renewal Application dated October 30, 2020

(continued on the next page)

TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

POST AT INSTALLATION ADDRESS
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SECTION A

GENERAL PERMIT CONDITIONS

A permit issued under the provisions of paragraph 1200-03-09-.02(11) is a permit issued pursuant to the requirements of Title V of the Federal Act and its implementing Federal regulations promulgated at 40 CFR, Part 70.

A1. **Definitions.** Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

TAPCR 1200-03

A2. **Compliance requirement.** All terms and conditions in a permit issued pursuant to paragraph 1200-03-09-.02(11) including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act. The permittee shall comply with all conditions of its permit. Except for requirements specifically designated herein as not being federally enforceable (State Only), non-compliance with the permit requirements is a violation of the Federal Act and the Tennessee Air Quality Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Non-compliance with permit conditions specifically designated herein as not being federally enforceable (State Only) is a violation of the Tennessee Air Quality Act and may be grounds for these actions.

TAPCR 1200-03-09-.02(11)(e)2(i) and 1200-03-09-.02(11)(e)1(vi)(I)

A3. **Need to halt or reduce activity.** The need to halt or reduce activity is not a defense for noncompliance. It shall not be a defense for a 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 the permit. However, nothing in this item shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations.

TAPCR 1200-03-09-.02(11)(e)1(vi)(II)

A4. **The permit.** The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

TAPCR 1200-03-09-.02(11)(e)1(vi)(III)

A5. **Property rights.** The permit does not convey any property rights of any sort, or any exclusive privilege.

TAPCR 1200-03-09-.02(11)(e)1(vi)(IV)

A6. **Submittal of requested information.** The permittee shall furnish to the Technical Secretary, within a reasonable time, any information that the Technical Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or termination of the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Technical Secretary copies of records required to be kept by the permit. If the permittee claims that such information is confidential, the Technical Secretary may review that claim and hold the information in protected status until such time that the Board can hear any contested proceedings regarding confidentiality disputes. If the information is desired by EPA, the permittee may mail the information directly to EPA. Any claims of confidentiality for federal purposes will be determined by EPA.

TAPCR 1200-03-09-.02(11)(e)1(vi)(V)

A7. **Severability clause.** The requirements of this permit are severable. A dispute regarding one or more requirements of this permit does not invalidate or otherwise excuse the permittee from their duty to comply with the remaining portion of the permit.

TAPCR 1200-03-09.02(11)(e)1(v)
A8. **Fee payment.**

(a) The permittee shall pay an annual Title V emission fee based upon the responsible official’s choice of actual emissions, allowable emissions, or a combination of actual and allowable emissions; and on the responsible official’s choice of annual accounting period. An emission cap of 4,000 tons per year per regulated pollutant per major source SIC Code shall apply to actual or allowable based emission fees. A Title V annual emission fee will not be charged for emissions in excess of the cap. Title V annual emission fees will not be charged for carbon monoxide or for greenhouse gas pollutants solely because they are greenhouse gases.

(b) Title V sources shall pay allowable based emission fees until the beginning of the next annual accounting period following receipt of their initial Title V operating permit. At that time, the permittee shall begin paying their Title V fee based upon their choice of actual or allowable based fees, or mixed actual and allowable based fees. Once permitted, the Responsible Official may revise their existing fee choice by submitting a written request to the Division no later than December 31 of the annual accounting period for which the fee is due.

(c) When paying annual Title V emission fees, the permittee shall comply with all provisions of 1200-03-26-.02 and 1200-03-09-.02(11) applicable to such fees.

(d) Where more than one (1) allowable emission limit is applicable to a regulated pollutant, the allowable emissions for the regulated pollutants shall not be double counted. Major sources subject to the provisions of paragraph 1200-03-26-.02(9) shall apportion their emissions as follows to ensure that their fees are not double counted.

1. Sources that are subject to federally promulgated hazardous air pollutant under 40 CFR 60, 61, or 63 will place such regulated emissions in the regulated hazardous air pollutant (HAP) category.
2. A category of miscellaneous HAPs shall be used for hazardous air pollutants listed at part 1200-03-26-.02(2)(i)12 that are not subject to federally promulgated hazardous air pollutant standards under 40 CFR 60, 61, or 63.
3. HAPs that are also in the family of volatile organic compounds, particulate matter, or PM\textsubscript{10} shall not be placed in either the regulated HAP category or miscellaneous HAP category.
4. Sources that are subject to a provision of chapter 1200-03-16 New Source Performance Standards (NSPS) or chapter 0400-30-39 Standards of Performance for New Stationary Sources for pollutants that are neither particulate matter, PM\textsubscript{10}, sulfur dioxide (SO\textsubscript{2}), volatile organic compounds (VOC), nitrogen oxides (NO\textsubscript{x}), or hazardous air pollutants (HAPs) will place such regulated emissions in an NSPS pollutant category.
5. The regulated HAP category, the miscellaneous HAP category, and the NSPS pollutant category are each subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).
6. Major sources that wish to pay annual emission fees for PM\textsubscript{10} on an allowable emission basis may do so if they have a specific PM\textsubscript{10} allowable emission standard. If a major source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM\textsubscript{10} emission basis, it may do so if the PM\textsubscript{10} actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM\textsubscript{10} emission levels must be made as part of the source’s major source operating permit in advance in order to exercise this option. The PM\textsubscript{10} emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) shall also apply to PM\textsubscript{10} emissions.

TAPCR 1200-03-26-.02 and 1200-03-09-.02(11)(e)1(vii)

A9. **Permit revision not required.** A permit revision will not be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or process for changes that are provided for in the permit.

TAPCR 1200-03-09-.02(11)(e)1(viii)

A10. **Inspection and entry.** Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Technical Secretary or an authorized representative to perform the following for the purposes of determining compliance with the permit applicable requirements:

(a) Enter upon, at reasonable times, the permittee’s premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

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

(c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(d) As authorized by the Clean Air Act and Chapter 1200-03-10 of TAPCR, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(e) “Reasonable times” shall be considered to be customary business hours unless reasonable cause exists to suspect noncompliance with the Act, Division 1200-03 or any permit issued pursuant thereto and the Technical Secretary specifically authorizes an inspector to inspect a facility at any other time.

TAPCR 1200-03-09-.02(11)(e)3(ii)
A11. Permit shield.
   (a) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance, provided that:
   1. Such applicable requirements are included and are specifically identified in the permit; or
   2. The Technical Secretary, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
   (b) Nothing in this permit shall alter or affect the following:
   1. The provisions of section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section. Similarly, the provisions of T.C.A. §68-201-109 (emergency orders) including the authority of the Governor under the section;
   2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
   3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Federal Act; or
   4. The ability of EPA to obtain information from a source pursuant to section 114 of the Federal Act.
   (c) Permit shield is granted to the permittee.

TAPCR 1200-03-09-.02(11)(e)6

A12. Permit renewal and expiration.
   (a) An application for permit renewal must be submitted at least 180 days, but no more than 270 days prior to the expiration of this permit. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted.
   (b) If the permittee submits a timely and complete application for permit renewal the source will not be considered to be operating without a permit until the Technical Secretary takes final action on the permit application, except as otherwise noted in paragraph 1200-03-09-.02(11).
   (c) This permit, its shield provided in Condition A11, and its conditions will be extended and effective after its expiration date provided that the source has submitted a timely, complete renewal application to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)2 and 3, 1200-03-09-.02(11)(d)1(i)(III), and 1200-03-09-.02(11)(a)2

A13. Reopening for cause.
   (a) A permit shall be reopened and revised prior to the expiration of the permit under any of the circumstances listed below:
   1. Additional applicable requirements under the Federal Act become applicable to the sources contained in this permit provided the permit has a remaining term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the permit expiration date of this permit, unless the original has been extended pursuant to 1200-03-09-.02(11)(a)2.
   2. Additional requirements become applicable to an affected source under the acid rain program.
   3. The Technical Secretary or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
   4. The Technical Secretary or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
   (b) Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable.
   (c) Reopenings for cause shall not be initiated before a notice of such intent is provided to the permittee by the Technical Secretary at least 30 days in advance of the date that the permit is to be reopened except that the Technical Secretary may provide a shorter time period in the case of an emergency. An emergency shall be established by the criteria of T.C.A. 68-201-109 or other compelling reasons that public welfare is being adversely affected by the operation of a source that is in compliance with its permit requirements.
   (d) If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit as identified in A13, he is required under federal rules to notify the Technical Secretary and the permittee of such findings in writing. Upon receipt of such notification, the Technical Secretary shall investigate the matter in order to determine if he agrees or disagrees with the Administrator's findings. If he agrees with the Administrator's findings, the Technical Secretary shall conduct the reopening in the following manner:
   1. The Technical Secretary shall, within 90 days after receipt of such notification, forward to EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate. If the Administrator grants
additional time to secure permit applications or additional information from the permittee, the Technical Secretary shall have the additional time period added to the standard 90-day time period.

2. EPA will evaluate the Technical Secretary's proposed revisions and respond as to their evaluation.

3. If EPA agrees with the proposed revisions, the Technical Secretary shall proceed with the reopening in the same manner prescribed under Condition A13 (b) and Condition A13 (c).

4. If the Technical Secretary disagrees with either the findings or the Administrator that a permit should be reopened or an objection of the Administrator to a proposed revision to a permit submitted pursuant to Condition A13(d), he shall bring the matter to the Board at its next regularly scheduled meeting for instructions as to how he should proceed. The permittee shall be required to file a written brief expressing their position relative to the Administrator's objection and have a responsible official present at the meeting to answer questions for the Board. If the Board agrees that EPA is wrong in their demand for a permit revision, they shall instruct the Technical Secretary to conform to EPA's demand, but to issue the permit under protest preserving all rights available for litigation against EPA.

TAPCR. 1200-03-09-.02(11)(f)6 and 7.

A14. Permit transference. An administrative permit amendment allows for a change of ownership or operational control of a source where the Technical Secretary determines that no other change in the permit is necessary, provided that the following requirements are met:

(a) Transfer of ownership permit application is filed consistent with the provisions of 1200-03-09-.03(6), and

(b) written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)(IV) and 1200-03-09-.03(6)

A15. Air pollution alert. When the Technical Secretary has declared that an air pollution alert, an air pollution warning, or an air pollution emergency exists, the permittee must follow the requirements for that episode level as outlined in TAPCR 1200-03-09-.03(1) and TAPCR 1200-03-15-.03.

A16. Construction permit required. Except as exempted in TAPCR 1200-03-09-.04, or excluded in subparagraph TAPCR 1200-03-02-.01(1)(aa) or subparagraph TAPCR 1200-03-02-.01(1)(cc), this facility shall not begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit for the construction or modification of such air contaminant source.

TAPCR 1200-03-09-.01(1)(a)

A17. Notification of changes. The permittee shall notify the Technical Secretary 30 days prior to commencement of any of the following changes to an air contaminant source which would not be a modification requiring a construction permit.

(a) change in air pollution control equipment

(b) change in stack height or diameter

(c) change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

TAPCR 1200-03-09-.02(7)

A18. Schedule of compliance. The permittee will comply with any applicable requirement that becomes effective during the permit term on a timely basis. If the permittee is not in compliance the permittee must submit a schedule for coming into compliance which must include a schedule of remedial measure(s), including an enforceable set of deadlines for specific actions.

TAPCR 1200-03-09-.02(11)(d)3 and 40 CFR Part 70.5(c)

A19. Title VI.

(a) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.

2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to Section 82.158.
3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.

(b) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

(c) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR, Part 82, Subpart G, Significant New Alternatives Policy Program.

112(r). Sources which are subject to the provisions of Section 112(r) of the federal Clean Air Act or any federal regulations promulgated thereunder, shall annually certify in writing to the Technical Secretary that they are properly following their accidental release plan. The annual certification is due in the office of the Technical Secretary no later than January 31 of each year. Said certification will be for the preceding calendar year.

TAPCR 1200-03-32-.03(3)
SECTION B
GENERAL CONDITIONS for MONITORING, REPORTING, and ENFORCEMENT

B1. **Recordkeeping.** Monitoring and related record keeping shall be performed in accordance with the requirements specified in the permit conditions for each individual permit unit. In no case shall reports of any required monitoring and record keeping be submitted less frequently than every six months.

   (a) Where applicable, records of required monitoring information include the following:
   1. The date, place as defined in the permit, and time of sampling or measurements;
   2. The date(s) analyses were performed;
   3. The company or entity that performed the analysis;
   4. The analytical techniques or methods used;
   5. The results of such analyses; and
   6. The operating conditions as existing at the time of sampling or measurement.

   (b) Digital data accumulation which utilizes valid data compression techniques shall be acceptable for compliance determination as long as such compression does not violate an applicable requirement and its use has been approved in advance by the Technical Secretary.

   TAPCR 1200-03-09-.02(11)(e)1(iii)

B2. **Retention of monitoring data.** The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

   TAPCR 1200-03-09-.02(11)(e)1(iii)(II)III

B3. **Reporting.** Reports of any required monitoring and record keeping shall be submitted to the Technical Secretary in accordance with the frequencies specified in the permit conditions for each individual permit unit. Reports shall be submitted within 60 days of the close of the reporting period unless otherwise noted. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. Reports required under "State only requirements" are not required to be certified by a responsible official.

   TAPCR 1200-03-09-.02(11)(e)1(iii)

B4. **Certification.** Except for reports required under “State Only” requirements, any application for, report or compliance certification submitted pursuant to the requirements of this permit shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

   TAPCR 1200-03-09-.02(11)(d)4

B5. **Annual compliance certification.** The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

   (a) The identification of each term or condition of the permit that is the basis of the certification;
   (b) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
   (c) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in B5(b) above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and
(d) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* “Excursion” shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** “Exceedance” shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No. 144, July 28, 2014, pages 43661 through 43667

B6. Submission of compliance certification. The compliance certification shall be submitted to:

| The Tennessee Department of Environment and Conservation Environmental Field Office specified in Section E of this permit | and | Air Enforcement Branch US EPA Region IV 61 Forsyth Street, SW Atlanta, Georgia 30303 |

TAPCR 1200-03-09-.02(11)(e)3(v)(IV)

B7. Emergency provisions. An emergency constitutes an affirmative defense to an enforcement action brought against this source for noncompliance with a technology based emission limitation due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(a) The affirmative defense of the emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An emergency occurred and that the permittee can identify the probable cause(s) of the emergency. "Probable" must be supported by a credible investigation into the incident that seeks to identify the causes and results in an explanation supported by generally accepted engineering or scientific principles.

2. The permitted source was at the time being properly operated. In determining whether or not a source was being properly operated, the Technical Secretary shall examine the source's written standard operating procedures which were in effect at the time of the noncompliance and any other code as detailed below that would be relevant to preventing the noncompliance. Adherence to the source's standard operating procedures will be the test of adequate preventative maintenance, careless operation, improper operation or operator error to the extent that such adherence would prevent noncompliance. The source's failure to follow recognized standards of practice to the extent that adherence to such a standard would have prevented noncompliance will disqualify the source from any claim of an emergency and an affirmative defense.

3. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

4. The permittee submitted notice of the emergency to the Technical Secretary according to the notification criteria for malfunctions in rule 1200-03-20-.03. For the purposes of this condition, "emergency" shall be substituted for "malfunction(s)" in rule 1200-03-20-.03 to determine the relevant notification threshold. The notice shall include a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding the permittee seeking to establish the occurrence of an emergency has the burden of proof.

(c) The provisions of this condition are in addition to any emergency, malfunction or upset requirement contained in Division 1200-03 or other applicable requirement.

TAPCR 1200-03-09-.02(11)(e)7

B8. Excess emissions reporting.

(a) The permittee shall promptly notify the Technical Secretary when any emission source, air pollution control equipment, or related facility breaks down in such a manner to cause the emission of air contaminants in excess of the applicable emission standards contained in Division 1200-03 or any permit issued thereto, or of sufficient duration to cause damage to property or public health. The permittee must provide the Technical Secretary with a statement giving all pertinent facts, including the estimated duration of the breakdown. Violations of the visible emission standard which occur for less than 20 minutes in one day (midnight to midnight) need not be reported. Prompt notification will be within 24 hours of the malfunction and shall be provided by telephone to the Division's Nashville office. The Technical Secretary shall be notified when the condition causing the failure or breakdown has been corrected. In attainment and unclassified areas if emissions other than from sources designated as significantly impacting on a nonattainment area in excess of the standards will not and do not occur.
over more than a 24-hour period (or will not recur over more than a 24-hour period) and no damage to property and or public health is anticipated, notification is not required.

(b) Any malfunction that creates an imminent hazard to health must be reported by telephone immediately to the Division's Nashville office at (615) 532-0554 and to the State Civil Defense.

(c) A log of all malfunctions, startups, and shutdowns resulting in emissions in excess of the standards in Division 1200-03 or any permit issued thereto must be kept at the plant. All information shall be entered in the log no later than twenty-four (24) hours after the startup or shutdown is complete, or the malfunction has ceased or has been corrected. Any later discovered corrections can be added in the log as footnotes with the reason given for the change. This log must record at least the following:

1. Stack or emission point involved
2. Time malfunction, startup, or shutdown began and/or when first noticed
3. Type of malfunction and/or reason for shutdown
4. Time startup or shutdown was complete or time the air contaminant source returned to normal operation
5. The company employee making entry on the log must sign, date, and indicate the time of each log entry

The information under items 1. and 2. must be entered into the log by the end of the shift during which the malfunction or startup began. For any source utilizing continuous emission(s) monitoring, continuous emission(s) monitoring collection satisfies the above log keeping requirement.

TAPCR 1200-03-20-.03 and .04

B9. Malfunctions, startups and shutdowns - reasonable measures required. The permittee must take all reasonable measures to keep emissions to a minimum during startups, shutdowns, and malfunctions. These measures may include installation and use of alternate control systems, changes in operating methods or procedures, cessation of operation until the process equipment and/or air pollution control equipment is repaired, maintaining sufficient spare parts, use of overtime labor, use of outside consultants and contractors, and other appropriate means. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions. This provision does not apply to standards found in 40 CFR, Parts 60(Standards of performance for new stationary sources), 61(National emission standards for hazardous air pollutants) and 63(National emission standards for hazardous air pollutants for source categories).

TAPCR 1200-03-20-.02

B10. Reserved.

B11. Report required upon the issuance of a notice of violation for excess emissions. The permittee must submit within twenty (20) days after receipt of the notice of violation, the data required below. If this data has previously been available to the Technical Secretary prior to the issuance of the notice of violation no further action is required of the violating source. However, if the source desires to submit additional information, then this must be submitted within the same twenty (20) day time period. The minimum data requirements are:

(a) The identity of the stack and/or other emission point where the excess emission(s) occurred;
(b) The magnitude of the excess emissions expressed in pounds per hour and the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
(c) The time and duration of the emissions;
(d) The nature and cause of such emissions;
(e) For malfunctions, the steps taken to correct the situation and the action taken or planned to prevent the recurrence of such malfunctions;
(f) The steps taken to limit the excess emissions during the occurrence reported, and
(g) If applicable, documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good operating practices for minimizing emissions.

Failure to submit the required report within the twenty (20) day period specified shall preclude the admissibility of the data for determination of potential enforcement action.

TAPCR 1200-03-20-.06(2), (3) and (4)
SECTION C
PERMIT CHANGES

C1. **Operational flexibility changes.** The source may make operational flexibility changes that are not addressed or prohibited by the permit without a permit revision subject to the following requirements:

(a) The change cannot be subject to a requirement of Title IV of the Federal Act or Chapter 1200-03-30.
(b) The change cannot be a modification under any provision of Title I of the federal Act or Division 1200-03.
(c) Each change shall meet all applicable requirements and shall not violate any existing permit term or condition.
(d) The source must provide contemporaneous written notice to the Technical Secretary and EPA of each such change, except for changes that are below the threshold of levels that are specified in Rule 1200-03-09-.04.
(e) Each change shall be described in the notice including the date, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change.
(f) The change shall not qualify for a permit shield under the provisions of part 1200-03-09-.02(11)(e)6.
(g) The permittee shall keep a record describing the changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. The records shall be retained until the changes are incorporated into subsequently issued permits.

TAPCR 1200-03-09-.02(11)(a)4 (ii)

C2. **Section 502(b)(10) changes.**

(a) The permittee can make certain changes without requiring a permit revision, if the changes are not modifications under Title I of the Federal Act or Division 1200-03 and the changes do not exceed the emissions allowable under the permit. The permittee must, however, provide the Administrator and Technical Secretary with written notification within a minimum of 7 days in advance of the proposed changes. The Technical Secretary may waive the 7 day advance notice in instances where the source demonstrates in writing that an emergency necessitates the change. Emergency shall be demonstrated by the criteria of TAPCR 1200-03-09-.02(11)(e)7 and in no way shall it include changes solely to take advantages of an unforeseen business opportunity. The Technical Secretary and EPA shall attach each such notice to their copy of the relevant permit.

(b) The written notification must be signed by a facility Title V responsible official and include the following:
   1. a brief description of the change within the permitted facility;
   2. the date on which the change will occur;
   3. a declaration and quantification of any change in emissions;
   4. a declaration of any permit term or condition that is no longer applicable as a result of the change; and
   5. a declaration that the requested change is not a Title I modification and will not exceed allowable emissions under the permit.

(c) The permit shield provisions of TAPCR 1200-03-09-.02(11)(e)6 shall not apply to Section 502(b)(10) changes.

TAPCR 1200-03-09-.02(11)(a)4 (i)

C3. **Administrative amendment.**

(a) Administrative permit amendments to this permit shall be in accordance with 1200-03-09-.02(11)(f)4. The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.

(b) The permit shield shall be extended as part of an administrative permit amendment revision consistent with the provisions of TAPCR 1200-03-09-.02(11)(e)6 for such revisions made pursuant to item (c) of this condition which meet the relevant requirements of TAPCR 1200-03-09-.02(11)(e), TAPCR 1200-03-09-.02(11)(f) and TAPCR 1200-03-09-.02(11)(g) for significant permit modifications.

(c) Proceedings to review and grant administrative permit amendments shall be limited to only those parts of the permit for which cause to amend exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)4
C4. **Minor permit modifications.**

(a) The permittee may submit an application for a minor permit modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(ii).

(b) The permittee may make the change proposed in its minor permit modification immediately after an application is filed with the Technical Secretary.

(c) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

(d) Minor permit modifications do not qualify for a permit shield.

TAPCR 1200-03-09-.02(11)(f)5(ii)

C5. **Significant permit modifications.**

(a) The permittee may submit an application for a significant modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(iv).

(b) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)5(iv)

C6. **New construction or modifications.**

Future construction at this facility that is subject to the provisions of TAPCR 1200-03-09-.01 shall be governed by the following:

(a) The permittee shall designate in their construction permit application the route that they desire to follow for the purposes of incorporating the newly constructed or modified sources into their existing operating permit. The Technical Secretary shall use that information to prepare the operating permit application submittal deadlines in their construction permit.

(b) Sources desiring the permit shield shall choose the administrative amendment route of TAPCR 1200-03-09-.02(11)(f)4 or the significant modification route of TAPCR 1200-03-09-.02(11)(f)5(iv).

(c) Sources desiring expediency instead of the permit shield shall choose the minor permit modification procedure route of TAPCR 1200-03-09-.02(11)(f)5(ii) or group processing of minor modifications under the provisions of TAPCR 1200-03-09-.02(11)(f)5(iii) as applicable to the magnitude of their construction.

TAPCR 1200-03-09-.02(11)(d) 1(i)(V)
SECTION D
GENERAL APPLICABLE REQUIREMENTS

D1. **Visible emissions.** With the exception of air emission sources exempt from the requirements of TAPCR Chapter 1200-03-05 and air emission sources for which a different opacity standard is specifically provided elsewhere in this permit, the permittee shall not cause, suffer, allow or permit discharge of a visible emission from any air contaminant source with an opacity in excess of twenty (20) percent for an aggregate of more than five (5) minutes in any one (1) hour or more than twenty (20) minutes in any twenty-four (24) hour period; provided, however, that for fuel burning installations with fuel burning equipment of input capacity greater than 600 million btu per hour, the permittee shall not cause, suffer, allow, or permit discharge of a visible emission from any fuel burning installation with an opacity in excess of twenty (20) percent (6-minute average) except for one six minute period per one (1) hour of not more than forty (40) percent opacity. Sources constructed or modified after July 7, 1992 shall utilize 6-minute averaging.

Consistent with the requirements of TAPCR Chapter 1200-03-20, due allowance may be made for visible emissions in excess of that permitted under TAPCR 1200-03-05 which are necessary or unavoidable due to routine startup and shutdown conditions. The facility shall maintain a continuous, current log of all excess visible emissions showing the time at which such conditions began and ended and that such record shall be available to the Technical Secretary or an authorized representative upon request.

TAPCR 1200-03-05-.01(1), TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.02(1)

D2. **General provisions and applicability for non-process gaseous emissions.** Any person constructing or otherwise establishing a non-portable air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize the best equipment and technology currently available for controlling such gaseous emissions.

TAPCR 1200-03-06-.03(2)

D3. **Non-process emission standards.** The permittee shall not cause, suffer, allow, or permit particulate emissions from non-process sources in excess of the standards in TAPCR 1200-03-06.

D4. **General provisions and applicability for process gaseous emissions.** Any person constructing or otherwise establishing an air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize equipment and technology which is deemed reasonable and proper by the Technical Secretary.

TAPCR 1200-03-07-.07(2)

D5. **Particulate emissions from process emission sources.** The permittee shall not cause, suffer, allow, or permit particulate emissions from process sources in excess of the standards in TAPCR 1200-03-07.

D6. **Sulfur dioxide emission standards.** The permittee shall not cause, suffer, allow, or permit Sulfur dioxide emissions from process and non-process sources in excess of the standards in TAPCR 1200-03-14. Regardless of the specific emission standard, new process sources shall utilize the best available control technology as deemed appropriate by the Technical Secretary of the Tennessee Air Pollution Control Board.

D7. **Fugitive Dust.**

(a) The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, but not be limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;
2. Application of asphalt, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;
3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.
(b) The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five (5) minutes per hour or twenty (20) minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in Chapter 1200-03-20.

TAPCR 1200-03-08

D8. Open burning. The permittee shall comply with the TAPCR 1200-03-04 for all open burning activities at the facility.

TAPCR 1200-03-04

D9. Asbestos. Where applicable, the permittee shall comply with the requirements of TAPCR 1200-03-11-.02(2)(d) when conducting any renovation or demolition activities at the facility.

TAPCR 1200-03-11-.02(2)(d) and 40 CFR, Part 61

D10. Annual certification of compliance. The generally applicable requirements set forth in Section D of this permit are intended to apply to activities and sources that are not subject to source-specific applicable requirements contained in State of Tennessee and U.S. EPA regulations. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related record keeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)1 and compliance requirements of TAPCR 1200-03-09-.02(11)(e)3.(i). The permittee shall submit compliance certification for these conditions annually.

D11. Emission Standards for Hazardous Air Pollutants. When applicable, the permittee shall comply with the TAPCR 0400-30-38 for all emission sources subject to a requirement contained therein.

TAPCR 0400-30-38

D12. Standards of Performance for New Stationary Sources. When applicable, the permittee shall comply with the TAPCR 0400-30-39 for all emission sources subject to a requirement contained therein.

TAPCR 0400-30-39

D13. Gasoline Dispensing Facilities. When applicable, the permittee shall comply with the TAPCR 1200-03-18-.24 for all emission sources subject to a requirement contained therein.


(a) All stationary reciprocating internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-38-.01.

(b) All stationary compression ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-39-.01.

(c) All stationary spark ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-39-.02.

TAPCR 0400-30-38 and 39
SECTION E
SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDKEEPING and REPORTING REQUIREMENTS

94-0072  Facility Description: Essex Furukawa Magnet Wire USA LLC is located at 120 Southeast Parkway in Franklin, Tennessee. The primary operation at this facility is the manufacture of magnet wire. This facility is subject to 40 CFR 63, Subpart MMMM - Surface Coating of Miscellaneous Metal Parts and Products and Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.

Conditions E1 through E3-15 apply to all sources in Section E of this permit unless otherwise noted.

E1. Fee payment

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 94-0072

<table>
<thead>
<tr>
<th>REGULATED POLLUTANTS</th>
<th>ALLOWABLE EMISSIONS (tons per AAP)</th>
<th>ACTUAL EMISSIONS (tons per AAP)</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>PARTICULATE MATTER (PM)</td>
<td>30.20</td>
<td>AEAR</td>
<td>Includes all fee emissions.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>SO₂</td>
<td>1.75</td>
<td>AEAR</td>
<td>Includes all fee emissions.</td>
</tr>
<tr>
<td>VOC</td>
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<td>AEAR</td>
<td>Includes all fee emissions.</td>
</tr>
<tr>
<td>NOₓ</td>
<td>99.0</td>
<td>AEAR</td>
<td>Includes all fee emissions.</td>
</tr>
</tbody>
</table>

CATEGORY OF MISCELLANEOUS HAZARDOUS AIR POLLUTANTS (HAPs WITHOUT A STANDARD)*

| VOC FAMILY GROUP          | N/A                                | AEAR                            | Included in VOC above    |
| NON-VOC GASEOUS GROUP     | N/A                                | N/A                             | N/A                     |
| PM FAMILY GROUP           | N/A                                | AEAR                            | Included in PM above     |

CATEGORY OF SPECIFIC HAZARDOUS AIR POLLUTANTS (HAPs WITH A STANDARD)**

| VOC FAMILY GROUP          | N/A                                | AEAR                            | NESHAP (40 CFR 63 Subpart MMMM). Fee emissions are included in VOC above. |
| NON-VOC GASEOUS GROUP     | N/A                                | N/A                             | N/A                     |
| PM FAMILY GROUP           | N/A                                | N/A                             | N/A                     |

CATEGORY OF NSPS POLLUTANTS NOT LISTED ABOVE***

| EACH NSPS POLLUTANT NOT LISTED ABOVE | N/A | N/A | N/A |

NOTES

AAP  The Annual Accounting Period (AAP) is a 12 consecutive month period that either (a) begins each July 1st and ends June 30th of the following year when fees are paid on a fiscal year basis, or (b) begins January 1st and ends December 31st of the same year when paying on a calendar year basis. The Annual Accounting Period at the time of permit renewal issuance began July 1, 2021, and ends June 30, 2022. The next Annual Accounting Period begins July 1, 2022, and ends June 30, 2023, unless a request to change the annual accounting period is submitted by the responsible official as required by subparagraph 1200-03-26-02(9)(b) of the TAPCR and approved by the Technical Secretary. If the permittee wishes to revise their annual accounting period or their annual emission fee basis as allowed by subparagraph 1200-03-26-02(9)(b) of the TAPCR, the responsible official must submit the request to the Division in writing on or before December 31 of the annual accounting period for which the fee is due. If a change in fee basis from allowable emissions to actual emissions for any pollutant is requested, the request from the responsible official must include the methods that will be used to determine actual emissions. Changes in fee bases must be made using the Title V Fee Selection form, form number APC 36 (CN-1583), included as an attachment to this permit and available on the Division of Air Pollution Control’s website.
If the permittee is paying annual emission fees on an actual emissions basis, AEAR indicates that an Actual Emissions Analysis is required to determine the actual emissions of:

(1) each regulated pollutant (Particulate matter, SO₂, VOC, NOₓ and so forth. See TAPCR 1200-03-26-.02(2) for the definition of a regulated pollutant.),
(2) each pollutant group (VOC Family, Non-VOC Gaseous, and Particulate Family),
(3) the Miscellaneous HAP Category,
(4) the Specific HAP Category, and
(5) the NSPS Category

under consideration during the Annual Accounting Period.

** Category of Miscellaneous HAP (HAP without a Standard): This category is made-up of hazardous air pollutants (HAP) that do not have a federal or state standard. Each HAP is classified into one of three groups, the VOC Family group, the Non-VOC Gaseous group, or the Particulate (PM) Family group. For fee computation, the Miscellaneous HAP Category is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

** Category of Specific HAP (HAP with a Standard): This category is made-up of hazardous air pollutants (HAP) that are subject to Federally promulgated Hazardous Air Pollutant Standards that can be imposed under Chapter 1200-03-11 or Chapter 1200-03-31. Each individual hazardous air pollutant is classified into one of three groups, the VOC Family group, the Non-VOC Gaseous group, or the Particulate (PM) Family group. For fee computation, each individual hazardous air pollutant of the Specific HAP Category is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

*** Category of NSPS Pollutants Not Listed Above: This category is made-up of each New Source Performance Standard (NSPS) pollutant whose emissions are not included in the PM, SO₂, VOC or NOₓ emissions from each source in this permit. For fee computation, each NSPS pollutant not listed above is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

END NOTES

The permittee shall:

(1) Pay Title V annual emission fees, on the emissions and year bases requested by the responsible official and approved by the Technical Secretary, for each annual accounting period (AAP) by the payment deadline(s) established in TAPCR 1200-03-26-.02(9)(g). Fees may be paid on an actual, allowable, or mixed emissions basis; and on either a state fiscal year or a calendar year, provided the requirements of TAPCR 1200-03-26-.02(9)(b) are met. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8).

(2) Sources paying annual emissions fees on an allowable emissions basis: pay annual allowable based emission fees for each annual accounting period no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d).

(3) Sources paying annual emissions fees on an actual emissions basis: prepare an actual emissions analysis for each AAP and pay actual based emission fees pursuant to TAPCR 1200-03-26-.02(9)(d). The actual emissions analysis shall include:
(a) The completed Fee Emissions Summary Table,
(b) each actual emissions analysis required, and
(c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary’s representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the annual fee basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the actual emissions analyses required by the above Fee Emissions Summary Table.

(4) Sources paying annual emissions fees on a mixed emissions basis: for all pollutants and all sources for which the permittee has chosen an actual emissions basis, prepare an actual
emissions analysis for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The actual emissions analysis shall include:

(a) the completed Fee Emissions Summary Table,
(b) each actual emissions analysis required, and
(c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary’s representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the fee bases approved by the Technical Secretary (payment on an actual or mixed emissions basis) and payment on a state fiscal year (July 1 through June 30) or a calendar year (January 1 through December 31). These records shall be used to complete the actual emissions analysis.

For all pollutants and all sources for which the permittee has chosen an allowable emissions basis, pay allowable based emission fees pursuant to TAPCR 1200-03-26-.02(9)(d).

(5) When paying on an actual or mixed emissions basis, submit the actual emissions analyses at the time the fees are paid in full.

The annual emission fee due dates are specified in TAPCR 1200-03-26-.02(9)(g) and are dependent on the Responsible Official’s choice of fee bases as described above. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8). Emissions for regulated pollutants shall not be double counted as specified in Condition A8(d) of this permit.

### Payment of the fee due and the actual emissions analysis (if required) shall be submitted to The Technical Secretary at the following address:

<table>
<thead>
<tr>
<th>Payment of Fee to:</th>
<th>Actual Emissions Analyses to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Tennessee Department of Environment and Conservation Division of Fiscal Services Consolidated Fee Section – APC William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 10th Floor Nashville, Tennessee 37243</td>
<td>The Tennessee Department of Environment and Conservation Division of Air Pollution Control Emission Inventory Program William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 15th Floor Nashville, Tennessee 37243</td>
</tr>
<tr>
<td>or</td>
<td>An electronic copy (PDF) of actual emissions analysis can also be submitted to: <a href="mailto:apc.inventory@tn.gov">apc.inventory@tn.gov</a></td>
</tr>
</tbody>
</table>

## E2. Reporting requirements

(a) **Semiannual reports.** Semiannual reports shall cover the six-month periods from **January 1** to **June 30** and **July 1** to **December 31** and shall be submitted within 60 days after the end of each six-month period. Subsequent reports shall be submitted within 60 days after the end of each 6-month period following the first report. The first semiannual report following issuance of this permit shall cover the following permits and reporting periods:

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Reporting Period Begins</th>
<th>Reporting Period Ends</th>
</tr>
</thead>
<tbody>
<tr>
<td>568956</td>
<td>January 1, 2022</td>
<td>Day before new permit issuance (with year)</td>
</tr>
<tr>
<td>578641</td>
<td>Issuance date of new permit (with year)</td>
<td>June 30, 2022</td>
</tr>
</tbody>
</table>

These semiannual reports shall include:

1. Any monitoring and recordkeeping required by Conditions E3-3, E3-12, and F1-11(2) of this permit. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
2. The visible emission evaluation readings from Conditions E3-2 of this permit, if required. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.
(3) Identification of all instances of deviations from ALL PERMIT REQUIREMENTS. This includes, but is not limited to, a listing of all three-hour periods when the three-hour block temperature averages fall below the minimum values required in Condition E3-4.

These reports must be certified by a responsible official consistent with Condition B4 of this permit and shall be submitted to The Technical Secretary at the address in Condition E2(b) of this permit.

TAPCR 1200-03-9-.02(11)(e)1(iii)

(b) Annual compliance certification. The permittee shall submit annually compliance certifications with each term or condition contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

(1) The identification of each term or condition of the permit that is the basis of the certification;
(2) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;
(3) The status of compliance with each term or condition of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in E2(b)2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an *excursion or **exceedance as defined below occurred; and
(4) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* “Excursion” shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** “Exceedance” shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

Annual compliance certifications shall cover the 12-month period from January 1 to December 31 and shall be submitted within 60 days after the end of each 12-month period. The first annual compliance certification following issuance of this permit shall cover the following permits and reporting periods:

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Reporting Period Begins</th>
<th>Reporting Period Ends</th>
</tr>
</thead>
<tbody>
<tr>
<td>568956</td>
<td>January 1, 2022</td>
<td>Day before new permit issuance (with year)</td>
</tr>
<tr>
<td>578641</td>
<td>Issuance date of new permit (with year)</td>
<td>December 31, 2022</td>
</tr>
</tbody>
</table>

These certifications shall be submitted to: TN APCD and EPA

Division of Air Pollution Control and Air Enforcement Branch
Nashville Environmental Field Office and US EPA Region IV
711 R. S. Gass Blvd. and 61 Forsyth Street, SW
Nashville, Tennessee 37216 and Atlanta, Georgia 30303

OR

APC.NashEFO@tn.gov

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667
TAPCR 1200-03-09-.02(11)(e)3(v)
(c) **40 CFR 63, Subpart MMMM – NESHAP for Surface Coating of Miscellaneous Metal Parts and Products Reporting Requirements**

(1) Semiannual compliance reports for Subpart MMMM, submitted in accordance with **Condition F1-11**, shall cover the six-month periods from **January 1 to June 30** and **July 1 to December 31** and shall be submitted within 60 days after the end of each six-month period. Subsequent reports shall be submitted within 60 days after the end of each 6-month period following the first report. The first semiannual MACT compliance report following issuance of this permit shall cover the following permits and reporting periods:

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Reporting Period Begins</th>
<th>Reporting Period Ends</th>
</tr>
</thead>
<tbody>
<tr>
<td>568956</td>
<td>January 1, 2022</td>
<td>Day before new permit issuance (with year)</td>
</tr>
<tr>
<td>578641</td>
<td>Issuance date of new permit (with year)</td>
<td>June 30, 2022</td>
</tr>
</tbody>
</table>

These semiannual reports shall include, at a minimum, the information specified in **Condition F1-11** and a listing of all three-hour periods for each oven/incinerator when the three-hour block temperature averages fall below the minimum values required in **Condition E3-4** as specified at 40 CFR §63.3967 (deviations).

Required MACT reports should be addressed to the Permit Program and EPA at the addresses given below:

Division of Air Pollution Control and Air Enforcement Branch
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, Tennessee 37243

OR
Air.Pollution.Control@tn.gov

Pursuant to §63.3920(f) and **Condition F1-11(8)**, on and after January 5, 2021, or once the reporting template has been available on the Compliance and Emissions Data Reporting Interface (CEDRI) website for one year whichever date is later, the permittee shall submit the semiannual compliance report required by this condition to EPA via CEDRI. CEDRI can be accessed through the EPA's CDX (https://cdx.epa.gov/). The permittee must use the appropriate electronic template on the CEDRI website for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website. The date report templates become available will be listed on the CEDRI website. If the reporting form for the semiannual compliance report specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the appropriate addresses listed in §63.13. Once the form has been available in CEDRI for one year, the permittee must begin submitting all subsequent reports via CEDRI.

(2) Reports of periodic performance tests required by **Condition F1-14 and F1-15** shall be submitted to the Technical Secretary and EPA. The reports should be addressed to the **Compliance Validation Program** and sent to the address in **Condition E2(c)(1)**.

Pursuant to §63.3920(d) and **Condition F1-11(7)**, for data collected using test methods supported by EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT website (https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert) at the time of the test, the permittee must submit the results of the performance test to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The CEDRI interface can be accessed through the EPA's Central Data Exchange (CDX) (https://cdx.epa.gov/). Performance test data must be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT website. For data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT website at the time of the test, the permittee must submit the results of the performance test to the Administrator at the appropriate address listed in §63.13, unless the Administrator agrees to or specifies an alternate reporting method.

(d) **40 CFR 63, Subpart DDDDD – NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters Reporting Requirements**

Pursuant to 40 CFR §63.7550 and **Condition F2-3**, the permittee must submit biennial 40 CFR 63, Subpart DDDDD compliance reports. The first biennial report following issuance of this permit shall cover the reporting period beginning on January 1, 2022, and ending on December 31, 2023. Reports must be postmarked or delivered no later...
than 60 days after the report period ends. Subsequent compliance reports will cover each 24-month period following the first report and shall be submitted within 60 days after the end of each reporting period.

Pursuant to §63.7550(h)(3), the permittee shall submit all reports required by Table 9 of Subpart DDDDD electronically via the Compliance and Emissions Data Reporting Interface (CEDRI) that can be accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx), if the reporting form specific to Subpart DDDDD is available in CEDRI at the time that the report is due. If the reporting form specific to Subpart DDDDD is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the address listed in §63.13.

Note that each NESHAP Report, Title V Semiannual Report (SAR), and each Title V Annual Compliance Certification (ACC) must be submitted under separate cover and each report must be accompanied by a separate compliance certification statement.

TAPCR 1200-03-09-.03(8)

(e) Retention of Records All records required by any condition in Section E of this permit must be retained for a period of not less than five years. Additionally, these records shall be kept available for inspection by the Technical Secretary or a Division representative.

TAPCR 1200-03-09-.02(11)(e)1(iii)(II)II

E3. General Permit Requirements

E3-1. Identification of Responsible Official, Technical Contact, and Billing Contact of the permitted facility:

(a) The application that was utilized in the preparation of this permit is dated October 30, 2020, and signed by Responsible Official James W. O'Connor, Plant Manager, of the permitted facility. Notification was received December 2, 2021, that Steven L. Williams, is now the Responsible Official. If this person terminates employment or is assigned different duties and is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements, and/or covenants.

(b) The application that was utilized in the preparation of this permit is dated October 20, 2020, and identifies Mr. Robert Distler, as the Principal Technical Contact for the permitted facility. Notification was received November 22, 2021, that Lisa Hamilton, is now the Principal Technical Contact. If this person terminates employment or is assigned different duties and is no longer the Principal Technical Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.

(c) The application that was utilized in the preparation of this permit is dated October 20, 2020, and identifies Mr. Robert Distler, as the Billing Contact for the permitted facility. Notification was received November 22, 2021, that Lisa Hamilton, is now the Billing Contact. If this person terminates employment or is assigned different duties and is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within 30 days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

TAPCR 1200-03-09-.03(8)

E3-2. Unless otherwise specified, visible emissions from this facility shall not exhibit greater than 20% opacity, except for one six-minute period in any one-hour period and for no more than four six-minute periods in any 24-hour period. Visible emissions shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6)
**Compliance Method:** The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996 (amended on September 11, 2013) that is enclosed as Attachment 1. Reports and certifications shall be submitted in accordance with **Condition E2** of this permit.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring.

**E3-3.** Volatile organic compounds (VOC) emitted from the entire facility, including emissions from insignificant activities and emission units, shall not exceed 235.0 tons during any period of 12 consecutive months.

TAPCR 1200-03-07-.07(2) and the agreement letter dated June 18, 2019 (Attachment 6). This limit was requested to avoid PSD applicability (PSD avoidance).

**Compliance Method:** Recordkeeping for VOC and hazardous air pollutant (HAP) emissions shall include the following information:

1. Emissions in tons of each HAP,
2. Emissions in tons of all HAP, and
3. Emissions in tons of VOC, excluding water and/or exempt compounds, for all input materials used in the magnet wire coating lines
4. Emissions in tons of VOC from the combustion of natural gas and
5. Emissions in tons of VOC from insignificant activities and emission units during each month and all intervals of twelve consecutive months. Actual VOC and HAP emissions from the magnet wire coating lines shall be calculated using an overall control efficiency as determined during the most recent approved Volatile Organic Compounds (VOC) testing, see **Condition E3-4**. Actual Emissions from insignificant activities may be calculated each month, or the permittee may choose to use the potential emission rates for these units. This information shall be recorded in the following logs (LOGS 1 – 3, or similar logs that include the same required information). These logs must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. Records shall also be retained to verify the HAP content of each material. This may include SDS, formulation data, or other documentation to establish the HAP content. This log must be retained for a period of not less than five years. **All data, including all required calculations, must be entered in the log no later than 30 days from the end of the month for which the data is required.**

**LOG 1 - MONTHLY VOC/HAP EMISSIONS LOG FOR MAGNET WIRE COATING LINES**

<table>
<thead>
<tr>
<th>Month/Year:</th>
<th>Material Name</th>
<th>Usage (lb/mo or gal/mo)</th>
<th>VOC Content (wt% or lb/gal)</th>
<th>Overall Control Efficiency (%)</th>
<th>VOC Emissions (ton/mo)</th>
<th>HAP₁ Content (wt%)</th>
<th>HAP₁ Emissions (ton/mo)</th>
<th>HAP₂ Content (wt%)</th>
<th>HAP₂ Emissions (ton/mo)</th>
<th>Total HAP Emitted (ton/mo)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Name</td>
<td>Usage (lb/mo or gal/mo)</td>
<td>VOC Content (wt% or lb/gal)</td>
<td>Overall Control Efficiency (%)</td>
<td>VOC Emissions (ton/mo)</td>
<td>HAP₁ Content (wt%)</td>
<td>HAP₁ Emissions (ton/mo)</td>
<td>HAP₂ Content (wt%)</td>
<td>HAP₂ Emissions (ton/mo)</td>
<td>Total HAP Emitted (ton/mo)</td>
<td></td>
</tr>
</tbody>
</table>

* Please note that this table may be expanded to include additional HAP (n = the number of different hazardous air pollutants. Use columns as required for the number of different hazardous air pollutants.) HAP emissions are required for MACT calculations. However, HAP emissions will not need to be calculated for this table (Log #1) and Log #2 if the same values are calculated in another summary for MACT compliance purposes. Although the monthly usage rates for each compound used at the facility are not required to be submitted, the monthly emission rates for each individual (speciated) HAP must be reported with the Semiannual Report required by **Condition E2(a).**

**LOG 2 – FACILITY-WIDE MONTHLY VOC EMISSIONS LOG**

<table>
<thead>
<tr>
<th>Month/Year:</th>
<th>Emission Source</th>
<th>VOC Emissions (tons/mo)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Source</td>
<td>VOC Emissions (tons/mo)</td>
<td></td>
</tr>
<tr>
<td>Magnet Wire Coating Lines</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Gas Combustion</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Insignificant Emission units/Activities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
LOG 3 - 12 CONSECUTIVE MONTH VOC/HAP EMISSIONS LOG

<table>
<thead>
<tr>
<th>Month/Year</th>
<th>VOC Emissions (tons/month)</th>
<th>VOC Emissions (tons/12 months)*</th>
<th>Total HAP Emissions (tons/month)</th>
<th>Total HAP Emissions (tons/12 months)*</th>
</tr>
</thead>
</table>

* The Tons per 12 Month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed + the VOC (or HAP) emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this log, the value will be equal to the value for tons per month. For the second month it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed, that is, 6 (2) represents 6 tons emitted in 2 months.

E3-4. The following overall control efficiency values have been established for the indicated ovens based upon testing. The Technical Secretary may revise these values by Administrative Amendment if new test data is found to be acceptable. These values may be used to demonstrate compliance with the applicable requirements of TAPCR 1200-03-18-.19 - Coating of Magnet Wire and 40 CFR 63, Subpart MMMM – National Emission Standards for Hazardous Air Pollutions for Surface Coating of Miscellaneous Metal Parts and Products (Subpart MMMM) as long as all applicable requirements for the system are met.

Table 1 - Overall Control Device Efficiencies and Associated Minimum Temperatures

<table>
<thead>
<tr>
<th>Emission Source Reference No.</th>
<th>Oven Identification No.</th>
<th>Overall Control Efficiency</th>
<th>Type of Control, Oven Configuration</th>
<th>Minimum Incinerator Temperature (°F)</th>
</tr>
</thead>
<tbody>
<tr>
<td>94-0072-05</td>
<td>201, 202, 205, 207 and 209</td>
<td>98.6%</td>
<td>Thermal control, vertical oven</td>
<td>1,354</td>
</tr>
<tr>
<td></td>
<td>203 and 206</td>
<td>97.86%</td>
<td>Catalytic control, vertical oven</td>
<td>706</td>
</tr>
<tr>
<td></td>
<td>204, 208, and 210-212</td>
<td>99.4%</td>
<td>Thermal control, vertical oven</td>
<td>1,326</td>
</tr>
<tr>
<td>94-0072-06</td>
<td>301 - 306</td>
<td>94.9%</td>
<td>Thermal control, horizontal oven</td>
<td>1,350</td>
</tr>
<tr>
<td>94-0072-16</td>
<td>213 - 216</td>
<td>98.6%</td>
<td>Thermal control, vertical oven</td>
<td>1,354</td>
</tr>
<tr>
<td></td>
<td>217 - 220²</td>
<td>98.6%</td>
<td>Thermal control, vertical oven</td>
<td>1,354</td>
</tr>
<tr>
<td>94-0072-17</td>
<td>313 - 315</td>
<td>99.8%</td>
<td>Catalytic control, horizontal oven</td>
<td>1,260</td>
</tr>
<tr>
<td></td>
<td>316</td>
<td>99.91%</td>
<td>Catalytic control, horizontal oven</td>
<td>651</td>
</tr>
<tr>
<td></td>
<td>317</td>
<td>99.4%</td>
<td>Catalytic control, horizontal oven</td>
<td>950</td>
</tr>
<tr>
<td>94-0072-18</td>
<td>601 - 602</td>
<td>99.99³</td>
<td>Thermal control, vertical oven</td>
<td>1,350³</td>
</tr>
</tbody>
</table>

¹ Under the provisions of Appendix A to Subpart MMMM of Part 63 - Alternative Capture Efficiency and Destruction Efficiency Measurement and Monitoring Procedures for Magnet Wire Coating Operations (Attachment 3) at 3.12, the permittee may elect to “monitor and record the temperature either just before or just after the catalyst bed…”
² Permittee indicates that these ovens are identical to ovens 213-216; the Division will accept test results for ovens 213-216 as representative of ovens 217 - 220.
³ Information provided by permittee based on identical units (same model) tested in Vincennes, Indiana on September 21-23, 2004.

E3-5. The VOC content of solvent-based coatings* with a VOC emission standard included in Chapter 1200-03-18 of the Tennessee Air Pollution Control Regulations shall be determined once by using the procedures and analyses of EPA Method 24 as stipulated in 1200-03-18-.81 of the Regulations. This determination shall be made for the coating as it is applied, whether complying by 100 percent complying coatings or weighted average. This determination may be obtained by laboratory analyses or from manufacturer or vendor certification stating the VOC content was by EPA Method 24 or other approved alternative. Approved alternatives include, but are not limited to, the permittee may also use the procedure of the VOC analysis (Essex Test Procedure TP1000) as described in the September 17, 1996 letter submitted by the permittee to determine the VOC content of polyamide coatings.
The VOC content of water-based coatings** and thinners shall be determined by safety data sheets or from manufacturer or vendor formulation data which explicitly list VOC content by weight.

The VOC content of any new coating shall be determined as stated above within 90 days of the initial use as a new production coating. The results of all of these determinations for both existing and new coatings for the emissions source of concern shall also be compiled in a tabular or spreadsheet format and maintained at the source location. This information shall be made available for inspection by the Technical Secretary or his representative.

New production coatings do not include materials used in limited quantities (< 500 gallons per month) for the purpose of research and development or product trials.

* A solvent-based coating is one which contains 5 percent or less water by weight in its volatile fraction.
** A water-based coating is one which contains more than 5 percent water by weight in its volatile fraction.

E3-6. The owner or operator of any facility in Davidson, Rutherford, Shelby, Sumner, Knox, Blount, Anderson, Williamson, or Wilson County which has potential emissions from stationary sources (including sources considered insignificant activities) of 25 tons or more of volatile organic compounds (VOC) and/or nitrogen oxides (NOx) during a calendar year shall report to the Technical Secretary information and data concerning these emissions. This information and data shall be in the format prescribed by the Technical Secretary, and shall be submitted before March 31 of the year following the calendar year for which the information and data is reported. Each report shall be signed by an official of the company, certifying that the information and data contained in the report is accurate to the best knowledge of the individual certifying the report. Reports shall be submitted to the Permit Program at the address provided in Condition E2(c).

TAPCR 1200-03-18-.02(8), 1200-03-27-.02(6), and 1200-03-09-.03(8)

E3-7. This facility must comply with all applicable provisions of TAPCR 1200-03-18-.19 - Coating of Magnet Wire, including but not limited to compliance with the VOC content limit of 1.7 pounds per gallon (lb/gal) of coating, excluding water and/or exempt compounds, as applied. The permittee has elected to comply with TAPCR 1200-03-18-.19(5)(a)2 which states, in part, that “The overall emission reduction needed is the lesser of the value calculated according to the procedure in this chapter or 95 percent.”

Note that TAPCR 1200-03-18-.83(2) states that:

“The methods and procedures for determining the destruction or removal efficiency and monitoring parameters of incinerators and carbon adsorbers shall be according to the following, unless an alternate method or procedure has been approved by the EPA and the Technical Secretary:”

In accordance with the above stated rule, the Division has elected to require measurement of the temperature at the outlet of the control device for the magnet wire incinerators, both thermal and catalytic units. Note that the monitoring required by 40 CFR 63, Subpart MMMM is more stringent than the temperature monitoring required by TAPCR 1200-03-18-.03(5)(b).

Therefore, this source shall not be operated without the associated capture system and thermal incinerator or catalytic control device as required by TAPCR 1200-03-18-.19(5).

Compliance Method: The enclosure/capture system for the magnet wire coating process lines shall meet the following criteria for total enclosures to assure 100% capture of emissions being sent to the control device:

(a) Any natural draft opening (NDO) shall be at least four equivalent opening diameters from each VOC emitting point unless otherwise specified by the Technical Secretary. An NDO is defined as any permanent opening in the enclosure that remains open during operation of the emission source and is not connected to a duct in which a fan is installed.
(b) Any exhaust point from the enclosure shall be at least four equivalent duct or hood diameters from each NDO.
(c) The total area of all NDOs shall not exceed five percent of the surface area of the enclosure’s four walls, floor, and ceiling.
(d) The average facial velocity (FV) of air through all NDOs shall be at least 200 feet per minute. The direction of air flow through all NDOs shall be into the enclosure. A differential pressure across the enclosure of 0.007 inches of water (0.013 mm Hg) is required to demonstrate compliance with this requirement. The vents are designed so that the airflow at all NDOs will exceed 200 feet per minute when operated at the desired temperature needed to produce quality wire.
(e) All access doors and windows whose areas are not included in item (c) and are not included in the calculation in item (d) shall be closed during routine operation of the emission source except for moving raw materials and product.
(f) All VOC and volatile HAP emissions must be captured and contained for discharge through the control device (thermal or catalytic incinerator).
The incinerator shall meet the following criteria:

(a) The incinerator will be equipped with a monitoring device measuring the temperature in the combustion chamber at all times the incinerator is in use. The device will have an accuracy of plus or minus 25°F over its operating range and be installed, calibrated, operated, and maintained according to vendor’s specifications.
(b) The minimum combustion chamber temperature shall be the average temperature measured during the most recent performance test during routine operation of this source.
(c) The temperature shall be recorded on a continuous basis. Data shall be kept on file for a period of at least five years and made available to the Technical Secretary or a Division representative upon request.
(d) Per TAPCR 1200-03-18-.03, for thermal incinerators, the permittee shall collect and record all 3-hour periods of operation in which the average combustion temperature was more than 28°C (50°F) below the average combustion temperature during the most recent performance test that demonstrated that the facility was in compliance.

E3-8. “Dri-Lube Applicators” are used to coat wire with lubricant to facilitate winding at the final production stage. The permittee has installed permanent total enclosures for emissions capture around some applicators, as indicated below, in order to collect VOC and volatile HAP emissions produced from this activity and duct these emissions to the curing oven incinerators. The approved overall control efficiency for the associated curing oven incinerator may be used to calculate the reduction in VOC emissions from each Dri-Lube Applicator listed below when the permanent total enclosure for each unit is operational and the associated oven is operating properly. In order to take credit for the VOC/volatile HAP emissions reduction from this collection/incineration system, each permanent total enclosure (PTE) for each of the Dri-Lube Applicator systems shall meet the criteria for total enclosures specified in Condition E3-7. Each enclosure that meets these criteria is assumed to have 100% VOC/volatile HAP capture efficiency.

The company may install Dri-Lube capture enclosures on additional units without the need for permit modification, but the Division must be notified of the date of completion of the enclosure, and must specify in writing the approval of the additional control efficiency before including the capture and destruction of VOC emissions for calculation purposes.

As of the issue date of this permit, the following units are equipped with Dri-Lube capture:

<table>
<thead>
<tr>
<th>Lines and Associated Units Equipped with Dri-Lube Capture and PTE</th>
<th>Lines and Associated Units Not Equipped with Dri-Lube Capture</th>
</tr>
</thead>
<tbody>
<tr>
<td>94-0072-05</td>
<td>94-0072-06</td>
</tr>
<tr>
<td>94-0072-16</td>
<td>94-0072-17*</td>
</tr>
<tr>
<td>94-0072-18</td>
<td></td>
</tr>
</tbody>
</table>

* The new replacement for Oven 316 on source 94-0072-17 will be using wax as a lubricant instead of Dri-Lube, which contains no VOC or HAP.

TAPCR. 1200-03-.09-.03(8)

E3-9. The following conditions specify Reasonably Available Control Technology (RACT) for application of wire lubricant (Dri-Lube) at certain Magnet Wire Coating Lines:

E4-5 Magnet Wire Coating Lines 204, 208, and 210 through 212
E5-5 Magnet Wire Coating Lines 301 through 306
E7-2 Magnet Wire Coating Lines 313 through 317

Upon approval by the Tennessee Air Pollution Control Board, these requirements may be removed for sources for which enclosures have been constructed which convey lubricating fluid solvent vapor emissions to the associated curing oven/incinerator.

E3-10. Preventive Maintenance Plan. The permittee shall implement and maintain a Preventive Maintenance Plan (PMP) for this facility. The PMP shall include the following information:
(a) Identification of the personnel (staff positions) responsible for inspecting, maintaining, and repairing emission control devices;
(b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
(c) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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TAPCR 1200-03-10-.02(2)(a)

Compliance Method: A copy of the PMP shall be submitted to the Technical Secretary, upon request and within a reasonable time, and shall be subject to review and approval by the Technical Secretary or a Division representative. The Technical Secretary may require the permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require certification by the responsible official.

E3-11. Purchase orders and/or invoices for all VOC- and HAP-containing materials, along with current safety data sheets (SDS), must be maintained and kept available for inspection by the Technical Secretary or a Division representative. The SDS must explicitly list the VOC and HAP content by weight for all VOC- and HAP-containing materials. If SDS are not available with this information, vendor formulation data containing the required information for those materials must also be maintained. These records must be retained for a period of not less than five years. Scanned invoices (maintained electronically) may be used to fulfill this requirement.

TAPCR 1200-03-10-.02(2)(a)

E3-12. Nitrogen oxides (NOx) emissions from this entire facility, including emissions from insignificant emission units, shall not exceed 99.0 tons during any period of 12 consecutive 12 months.

TAPCR 1200-03-27-.02 and the agreement letter dated February 5, 2015 (Attachment 5). This limit was set to maintain potential NOx emissions below the 100 ton per year RACT threshold set at TAPCR 1200-03-27-.03(1)(a).

Compliance Method: The permittee shall calculate actual emissions of NOx emitted from this facility during each calendar month and each period of 12 consecutive months. The sources of NOx emissions at this facility are natural gas combustion and the combustion of Amide-Imide (AI) topcoat solvent. The additional source of nitrogen for AI solvents is due to the presence of n-methyl-2-pyrrolidone (NMP). The permittee has indicated that the maximum NMP content of coatings will be 69.97% and the emission factors shown in Table 2 are set on this basis. The permittee is required to maintain copies of safety data sheets for all coatings to demonstrate that the NMP content does not exceed 69.97% by weight. Actual NOx emissions shall be calculated using the factors and information as shown below in Table 2.

### Table 2 - NOx Emission Factors for Facility

<table>
<thead>
<tr>
<th>NOx Emission source</th>
<th>NOx factor</th>
<th>Applicability to Facility</th>
<th>Basis for Factor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural Gas Combustion</td>
<td>100 lb NOx/million standard cubic feet of natural gas combusted</td>
<td>Applicable to all natural gas combustion Sources</td>
<td>AP-42 Table 1.4-1</td>
</tr>
<tr>
<td>Combustion of Amide-Imide (AI) topcoat solvent which contains NMP</td>
<td>0.086 lb NOx/lb NMP</td>
<td>Vertical ovens (see Table 1)</td>
<td>Testing of Oven 206 on March 24, 1994</td>
</tr>
<tr>
<td></td>
<td>0.061 lb NOx/lb NMP</td>
<td>Horizontal ovens (see Table 1)</td>
<td>Testing of Oven 304 on March 24, 1994</td>
</tr>
</tbody>
</table>

Recordkeeping for NOx emissions shall include the following information:

(1) Emissions in tons of NOx per month, to be summarized on a 12 consecutive month basis. This information shall be recorded in the following logs (LOGS 4 and 5, or similar logs that include the same required information). These logs must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. Records shall also be retained to verify the NMP content of each material. This may include SDS, formulation data, or other documentation to establish the NMP content. This log must be retained for a period of not less than five years. All data, including all required calculations, must be entered in the log no later than 30 days from the end of the month for which the data is required.

### LOG 4 - MONTHLY NOx EMISSIONS

<table>
<thead>
<tr>
<th>NOx Emissions from Categories as Indicated below, tons per month</th>
</tr>
</thead>
<tbody>
<tr>
<td>Month/Year</td>
</tr>
<tr>
<td>------------</td>
</tr>
<tr>
<td></td>
</tr>
</tbody>
</table>
E3-13. The following recordkeeping requirements shall apply to this facility:

(1) For monthly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than 30 days from the end of the month for which the data is required.
(2) For weekly recordkeeping, all data, including the results of all calculations, must be entered into the log no later than seven days from the end of the week for which the data is required.
(3) For daily recordkeeping, all data, including the results of all calculations, must be entered into the log no later than seven days from the end of the day for which the data is required.

Logs and records specified in this permit shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative and shall be retained for a period of not less than five years unless otherwise noted. Logs and records contained in this permit are based on a recommended format. Any logs and records that have an alternative format may be utilized provided they contain the same information that is required. Computer-generated logs are also acceptable.

TAPCR 1200-03-10-.02(2)(a)

E3-14. Insignificant activities (as defined at TAPCR 1200-03-09-.04(5)) for this facility are listed in the approved application dated October 20, 2020. Additional insignificant activities may be added and operated at any time with the provision that a written notification shall be submitted to the Technical Secretary, including an updated APC 2 application form along with a truth, accuracy, and completeness statement signed by a responsible official.

TAPCR 1200-03-09-.03(8)

F1. Requirements of 40 CFR Part 63, Subpart MMMM - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products

F1-1. This facility is subject to and shall comply with all applicable requirements of 40 CFR 63, Subpart MMMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (Subpart MMMM). This subpart applies to each new, reconstructed, or existing affected source, as defined in §63.3882, that uses 250 gallons per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of miscellaneous metal parts and products; and that is a major source, is located at a major source; or is part of a major source of emissions of HAP. It has been determined that this facility is an existing affected source in the magnet wire coating subcategory. This determination is based on the definition of reconstruction found in 40 CFR §63.2, as shown below:

Reconstruction, unless otherwise defined in a relevant standard, means the replacement of components of an affected or a previously nonaffected source to such an extent that:
(1) The fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new source; and
(2) It is technologically and economically feasible for the reconstructed source to meet the relevant standard(s) established by the Administrator (or a State) pursuant to section 112 of the Act. Upon reconstruction, an affected source, or a

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stationary source that becomes an affected source, is subject to relevant standards for new sources, including compliance dates, irrespective of any change in emissions of hazardous air pollutants from that source.

At such time as the status of the magnet wire coating affected source (all magnet wire coating equipment at this facility) meets the definition of reconstruction as specified above, all process equipment will become subject to the requirements for a “new magnet wire coating affected source” under 40 CFR 63, Subpart MMMM. The applicable provisions of Subpart MMMM are incorporated into this permit pursuant to TAPCR 1200-03-09-.03(8).

40 CFR §63.3881

F1-2. Subpart MMMM applies to each new, reconstructed or existing affected source within the magnet wire coating subcategory. An affected source is the collection of all of the items listed in paragraphs (1) through (4) of this condition.

(1) All coating operations as defined in §63.3981;
(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

40 CFR §63.3882(b)

F1-3. Reserved.

F1-4. For each existing magnet wire coating affected source, organic HAP emissions shall be limited to no more than 0.12 kg (1.0 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

40 CFR §63.3890(b)(3)

**Compliance Method:** Compliance with this limit is demonstrated by compliance with **Condition F1-17** and maintaining the records required by **Condition F1-12**.

F1-5. The permittee must include all coatings (as defined in §63.3981), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in **Condition F1-4**.

The permittee has elected to demonstrate compliance with the emission limit for this affected source using the **Emission rate with add-on controls option**. The permittee must demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), and the emissions reductions achieved by emission capture systems and add-on controls, the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in **Condition F1-4**, calculated as a rolling 12-month emission rate and determined on a monthly basis. For this compliance option, the permittee must also demonstrate that all emission capture systems and add-on control devices for the coating operation(s) meet the operating limits specified in **Condition F1-6**. Additionally, the permittee must meet the work practice standards specified in **Condition F1-7** and all the requirements of **Conditions F1-15 through F1-22** to demonstrate compliance with the emission limits, operating limits, and work practice standards using this option.

40 CFR §63.3891(c)

**Compliance method:** Compliance with this condition is assured by the recordkeeping required by **Condition F1-12**.

F1-6. For any controlled coating operation(s) on which the emission rate with add-on controls option is used, the permittee must meet the operating limits specified in Table 1 to Subpart MMMM (see Attachment 2). These operating limits apply to the emission capture and control systems on the coating operation(s) for which this option is used, and the permittee must establish the operating limits during the performance test according to the requirements in **Condition F1-21**. The permittee must meet the operating limits at all times after they are established (see minimum control unit temperatures in **Condition E3-4**).

If the permittee is using an add-on control device other than those listed in Table 1 to Subpart MMMM (Attachment 2), or the permittee wishes to monitor an alternative parameter and comply with a different operating limit, the permittee must apply to the U.S. Environmental Protection Agency for approval of alternative monitoring under 40 CFR §63.8(f).
40 CFR §63.3892(b) and (c)

Compliance method: Compliance with this requirement is assured by compliance with Condition E3-4 and maintaining the records required by Condition F1-12.

F1-7. If the permittee uses the emission rate with add-on controls option, the permittee must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s) for which the permittee uses this option; or the permittee must meet an alternative standard as provided in this condition. The plan must specify practices and procedures to ensure that, at a minimum, the elements specified in paragraphs (1) through (5) of this condition are implemented.

(1) All organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.
(2) Spills of organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.
(3) Organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.
(4) Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.
(5) Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.

As provided in 40 CFR § 63.6(g), the U.S. Environmental Protection Agency, may choose to grant the permittee permission to use an alternative to the work practice standards in this condition.

40 CFR §63.3893(b) and (c)

Compliance Method: Compliance with this condition is assured by maintaining a copy of the work practice plan onsite and maintaining copies of the records required by Condition F1-12.

F1-8. Pursuant to §63.3900, the permittee shall comply with the following general requirements:

(1) Any coating operation(s) for which the emission rate with add-on controls option is used, as specified in Condition F1-5, must be in compliance with the emission limitations as specified in subparagraphs (a) through (c) below.
   (a) The coating operation(s) must be in compliance with the applicable emission limit in Condition F1-4 and the operating limits in Table 1 to Subpart MMMM (Attachment 2) at all times.
   (b) The coating operation(s) must be in compliance with the operating limits for emission capture systems and add-on control devices required by Condition F1-6 at all times.
   (c) The coating operation(s) must be in compliance with the work practice standards in Condition F1-7 at all times.

(2) At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the owner or operator to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the Technical Secretary that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

Compliance Method: Compliance with this condition is assured by compliance with Conditions F1-15 and F1-17 and by maintaining the records required by Condition F1-12.

F1-9. Pursuant to §63.3901, the permittee shall comply with all applicable requirements of the general provisions as found in Table 2 to Subpart MMM of Part 63 (see Attachment 2).

F1-10. The permittee must submit the notifications in 40 CFR §§63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply by the dates specified in those sections, except as provided in §63.3910(b) and (c).

40 CFR §63.3910(a)
Compliance method: Compliance with this condition shall be assured submitting the specified notifications and by maintaining the records required by Condition F1-12.

F1-11. Pursuant to §63.3920, the permittee shall submit semiannual reports for each affected source in accordance with the requirements indicated below.

(1) The permittee shall submit semiannual reports in accordance with the schedule provided in Condition E2(c) of this permit.

(2) The permittee must report all deviations as defined in Subpart MMMM in the semiannual monitoring report required by Condition E2(a). If an affected source submits a semiannual compliance report pursuant to this condition along with, or as part of, the semiannual monitoring report required by Condition E2(a), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in Subpart MMMM, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the Technical Secretary.

(3) The semiannual compliance report must contain the information specified in subparagraphs (a) through (e) below, and the information specified in paragraphs (4), (5), and (7) of this condition that are applicable to the affected source.

(a) Company name and address.
(b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
(c) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
(d) Identification of the compliance option or options specified in Condition F1-5 that were used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, the report must state beginning and ending dates for each option used.

(4) If there were no deviations from the emission limitation in Conditions F1-4, F1-6, and F1-7 that apply to the facility, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. If using the emission rate with add-on controls option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out-of-control as specified in 40 CFR §63.8(c)(7), the semiannual compliance report must include a statement that there were no periods during which the CPMS were out-of-control during the reporting period.

(5) If the permittee used the emission rate with add-on controls option and there was a deviation from the applicable emission limitation in Condition F1-4 or the applicable operating limit(s) in Table 1 to Subpart MMMM (including any periods when emissions bypassed the add-on control device and were diverted to the atmosphere), the semiannual compliance report must contain the information in subparagraphs (a) through (l), (n) and (o) below. If there was a deviation from the applicable work practice standards in Condition F1-7, the semiannual compliance report must contain the information in subparagraph (m).

(a) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in Condition F1-4.
(b) The calculations used to determine the 12-month organic HAP emission rate for each compliance period in which a deviation occurred. The permittee must provide the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1 and 1A through 1C of §63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of §63.3951; the calculation of the mass of organic HAP emission reduction each month by emission capture systems and add-on control devices using Equations 1 and 1A through 1D of §63.3961, and Equations 2, 3, and 3A through 3C of §63.3961, as applicable; the calculation of the total mass of organic HAP emissions each month using Equation 4 of §63.3961; and the calculation of the 12-month organic HAP emission rate using Equation 5 of §63.3961. The permittee does not need to submit the background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports).
(c) The date and time that each malfunction of the capture system or add-on control devices started and stopped.
(d) A brief description of the CPMS.
(e) The date of the latest CPMS certification or audit.
(f) The number of instances that the CPMS was inoperative, and for each instance, except for zero (low-level) and high-level checks, the date, time, and duration that the CPMS was inoperative; the cause (including unknown cause) for the CPMS being inoperative; and the actions taken to minimize emissions in accordance with Condition F1-8.
(g) The number of instances that the CPMS was out-of-control as specified in §63.8(c)(7) and, for each instance, the date, time, and duration that the CPMS was out-of-control; the cause (including unknown cause) for the CPMS being out-of-control; and descriptions of corrective actions taken.

(h) The number of deviations from an operating limit in Table 1 to Subpart MMMM (Attachment 2) and, for each deviation, the date, time, and duration of any bypass of the add-on control device.

(i) A summary of the total duration of each deviation from an operating limit in Table 1 to Subpart MMMM (Attachment 2) and each bypass of the add-on control device during the semiannual reporting period, and the total duration as a percent of the total source operating time during that semiannual reporting period.

(j) A breakdown of the total duration of the deviations from the operating limits in Table 1 of Subpart MMMM (Attachment 2) and bypasses of the add-on control device during the semiannual reporting period into those that were due to control equipment problems, process problems, other known causes, and other unknown causes.

(k) A summary of the total duration of CPMS downtime during the semiannual reporting period and the total duration of CPMS downtime as a percent of the total source operating time during that semiannual reporting period.

(l) A description of any changes in the CPMS, coating operation, emission capture system, or add-on control device since the last semiannual reporting period.

(m) For deviations from the work practice standards, the number of deviations, and for each deviation, the information in parts (i) and (ii) below:

(i) A description of the deviation; the date, time, and duration of the deviation; and the actions taken to minimize emissions in accordance with Condition F1-8.

(ii) The description required in Condition F1-11(5)(m)(i) must include a list of the affected sources or equipment for which a deviation occurred and the cause of the deviation (including unknown cause, if applicable).

(n) For deviations from the emission limit in Condition F1-4 or an operating limit in Table 1 to Subpart MMMM (Attachment 2), a statement of the cause of each deviation (including unknown cause, if applicable) and the actions taken to minimize emissions in accordance with Condition F1-8.

(o) For each deviation from the emission limit in Condition F1-4 or an operating limit in Table 1 to Subpart MMMM (Attachment 2), a list of the affected sources or equipment for which a deviation occurred, an estimate of the quantity of each regulated pollutant emitted over the emission limit in Condition F1-4 or operating limit in Table 1 to Subpart MMMM, and a description of the method used to estimate emissions.

(6) If the permittee uses the emission rate with add-on controls option, the permittee must submit reports of performance test results for emission capture systems and add-on control devices no later than 60 days after completing the tests as specified in 40 CFR §63.10(d)(2).

(7) The permittee must submit the results of the performance test required in Conditions F1-14 and F1-15 following the procedure specified in subparagraphs (a) through (c) below.

(a) For data collected using test methods supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT website (https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert) at the time of the test, the permittee must submit the results of the performance test to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The CEDRI interface can be accessed through the EPA's Central Data Exchange (CDX) (https://cdx.epa.gov/). Performance test data must be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT website.

(b) For data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT website at the time of the test, the permittee must submit the results of the performance test to the Administrator at the appropriate address listed in §63.13, unless the Administrator agrees to or specifies an alternate reporting method.

(c) If the permittee claims that some of the performance test information being submitted under subparagraph (a) of this paragraph is Confidential Business Information (CBI), the permittee must submit a complete file generated through the use of the EPA's ERT or an alternate electronic file format consistent with the XML schema listed on the EPA's ERT website, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage medium to the EPA. The electronic medium must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404, 4930 Old Page Rd., Durham, NC 27703. The same ERT or alternate file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described in subparagraph (a) of this paragraph.

(8) On and after January 5, 2021, or once the reporting template has been available on the CEDRI website for one year, whichever date is later, the permittee shall submit the semiannual compliance report required in paragraph (1) of this condition to the EPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (https://cdx.epa.gov/). The permittee must use the appropriate electronic template on the CEDRI website for this subpart or an alternate electronic file format consistent with the XML schema listed on the CEDRI website (https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri). The date report templates become available will be listed on the CEDRI website. If the reporting form for the semiannual compliance report specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must
submit the report to the Administrator at the appropriate addresses listed in §63.13. Once the form has been available in CEDRI for one year, the permittee must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in **Condition E2(c)**, regardless of the method in which the reports are submitted. Permittees who claim that some of the information required to be submitted via CEDRI is CBI shall submit a complete report generated using the appropriate form in CEDRI or an alternate electronic file consistent with the XML schema listed on the EPA’s CEDRI website, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage medium to the EPA. The electronic medium shall be clearly marked as CBI and mailed to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same file with the CBI omitted shall be submitted to the EPA via the EPA’s CDX as described earlier in this paragraph.

(9) If the permittee is required to electronically submit a report through the CEDRI in the EPA’s CDX, and due to a planned or actual outage of either the EPA’s CEDRI or CDX systems within the period of time beginning five business days prior to the date that the submission is due, the permittee will be or is precluded from accessing CEDRI or CDX and submitting a required report within the time prescribed, the permittee may assert a claim of the EPA system outage for failure to timely comply with the reporting requirement. The permittee must submit notification to the Administrator in writing as soon as possible following the date the permittee first knew, or through due diligence should have known, that the event may cause or caused a delay in reporting. The permittee must provide to the Administrator a written description identifying the date, time, and length of the outage; a rationale for attributing the delay in reporting beyond the regulatory deadline to the EPA system outage; describe the measures taken or to be taken to minimize the delay in reporting; and identify a date by which the permittee proposes to report, or if the permittee has already met the reporting requirement at the time of the notification, the date the permittee reported. In any circumstance, the report must be submitted electronically as soon as possible after the outage is resolved. The decision to accept the claim of the EPA system outage and allow an extension to the reporting deadline is solely within the discretion of the Administrator.

(10) If the permittee is required to electronically submit a report through CEDRI in the EPA’s CDX and a force majeure event is about to occur, occurs, or has occurred or there are lingering effects from such an event within the period of time beginning five business days prior to the date the submission is due, the permittee may assert a claim of force majeure for failure to timely comply with the reporting requirement. For the purposes of this section, a force majeure event is defined as an event that will be or has been caused by circumstances beyond the control of the affected facility, its contractors, or any entity controlled by the affected facility that prevents the permittee from complying with the requirement to submit a report electronically within the time period prescribed. Examples of such events are acts of nature (e.g., hurricanes, earthquakes, or floods), acts of war or terrorism, or equipment failure or safety hazard beyond the control of the affected facility (e.g., large scale power outage). If the permittee intends to assert a claim of force majeure, the permittee must submit notification to the Administrator in writing as soon as possible following the date the permittee first knew, or through due diligence should have known, that the event may cause or caused a delay in reporting. The permittee must provide to the Administrator a written description of the force majeure event and a rationale for attributing the delay in reporting beyond the regulatory deadline to the force majeure event; describe the measures taken or to be taken to minimize the delay in reporting; and identify a date by which the permittee proposes to report, or if the permittee has already met the reporting requirement at the time of the notification, the date the permittee reported. In any circumstance, the reporting must occur as soon as possible after the force majeure event occurs. The decision to accept the claim of force majeure and allow an extension to the reporting deadline is solely within the discretion of the Administrator.

**Compliance Method:** Compliance with this condition shall be assured by submitting the required semiannual reports and maintaining the records required by **Condition F1-12**.

**F1-12.** Pursuant to §63.3930, the permittee must collect and keep records of the data and information specified in this condition. Failure to collect and keep these records is a deviation from the applicable standard.

1. A copy of each notification and report that was submitted to comply with Subpart MMMMM, and the documentation supporting each notification and report.
2. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If testing was conducted to determine the mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee must keep a copy of the complete test report. If using information provided by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.
3. For each compliance period for the emission rate with add-on controls option, the permittee must maintain the records of the calculations specified in subparagraphs (a) through (e) below:
(a) The calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1 and 1A through 1C of §63.3951 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4);
(b) The calculation of the total volume of coating solids used each month using Equation 2 of §63.3951;
(c) The calculation of the mass of organic HAP emission reduction by emission capture systems and add-on control devices using Equations 1 and 1A through 1D of §63.3961 and Equations 2, 3, and 3A through 3C of §63.3961, as applicable;
(d) The calculation of each month's organic HAP emission rate using Equation 4 of §63.3961; and
(e) The calculation of each 12-month organic HAP emission rate using Equation 5 of §63.3961.

(4) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period.

(5) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight.

(6) A record of the volume fraction of coating solids for each coating used during each compliance period.

(7) The density for each coating, thinner and/or other additive, and cleaning material used during each compliance period.

(8) If the permittee uses an allowance in Equation 1 of §63.3951 for organic HAP contained in waste materials sent to or designates for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.3951(e)(4), the permittee must keep records of the information specified in paragraphs (h)(1) through (3) of §63.3930.

(9) For each deviation from an emission limitation reported under Condition F1-11(5), a record of the information specified in subparagraphs (a) through (d) of this paragraph, as applicable.

(a) The date, time, and duration of the deviation, as reported under Condition F1-11(5).

(b) A list of the affected sources or equipment for which the deviation occurred and the cause of the deviation, as reported under Condition F1-11(5).

(c) An estimate of the quantity of each regulated pollutant emitted over the applicable emission limit in Condition F1-4 or any applicable operating limit in Table 1 to Subpart MMMM (Attachment 2), and a description of the method used to calculate the method, as reported under Condition F1-11(5).

(d) A record of actions taken to minimize emissions in accordance with Condition F1-8 and any corrective actions taken to return the affected unit to its normal or usual manner of operation.

(10) If using the emission rate with add-on controls option, the permittee must keep the records specified in items (a) through (h) below:

(a) The records required to show continuous compliance with each operating limit specified in Table 1 to Subpart MMMM (Attachment 2) that are applicable.

(b) For each capture system that is a PTE, the data and documentation used to determine the capture efficiency of 100 percent, as specified in Condition F1-19(1).

(c) A record of actions taken to minimize emissions in accordance with Condition F1-8 and any corrective actions taken to return the affected unit to its normal or usual manner of operation.

(i) Records for a liquid-to-uncaptured gas protocol using a temporary total enclosure or building enclosure. Records of the mass of total volatile hydrocarbon (TVH) as measured by Method 204A or 204F of Appendix M to 40 CFR Part 51 for each material used in the coating operation, and the total TVH for all materials used during each capture efficiency test run, including a copy of the test report. Records of the mass of TVH emissions not captured by the capture system that exited the temporary total enclosure or building enclosure during each capture efficiency test run, as measured by Method 204D or 204E of Appendix M to 40 CFR Part 51, including a copy of the test report. Records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 for either a temporary total enclosure or a building enclosure.

(ii) Records for a gas-to-gas protocol using a temporary total enclosure or a building enclosure. Records of the mass of TVH emissions captured by the emission capture system as measured by Method 204B or 204C of Appendix M to 40 CFR Part 51 at the inlet to the add-on control device, including a copy of the test report. Records of the mass of TVH emissions not captured by the capture system that exited the temporary total enclosure or building enclosure during each capture efficiency test run as measured by Method 204D or 204E of Appendix M to 40 CFR Part 51, including a copy of the test report. Records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of Appendix M to 40 CFR Part 51 for either a temporary total enclosure or a building enclosure.

(iii) Records for an alternative protocol. Records needed to document a capture efficiency determination using an alternative method or protocol as specified in Condition F1-19(5), if applicable.

(f) The records specified in (i) and (ii) below for each add-on control device organic HAP destruction or removal efficiency determination as specified in Condition F1-20.
(i) Records of each add-on control device performance test conducted according to Conditions F1-18 and F1-20.

(ii) Records of the coating operation conditions during the add-on control device performance test showing that the performance test was conducted under representative operating conditions.

(g) Records of the data and calculations used to establish the emission capture and add-on control device operating limits as specified in Condition F1-21 and to document compliance with the operating limits as specified in Table 1 of Subpart MMMM (Attachment 2).

(h) A record of the work practice plan required by Condition F1-7 and documentation that the plan is being implemented on a continuous basis.

Compliance Method: Compliance with these requirements shall be assured by maintaining the records specified above in accordance with Condition F1-13.

F1-13. Records must be in a form suitable and readily available for expeditious review, according to 40 CFR §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. Any records required to be maintained by Subpart MMMM that are in reports that were submitted electronically via the EPA’s CEDRI may be maintained in electronic format. This ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to the Technical Secretary or the EPA as part of an on-site compliance evaluation.

As specified in 40 CFR §63.10(b)(1), the permittee must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

The permittee must keep each record on-site for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR §63.10(b)(1). The permittee may keep the records off-site for the remaining three years.

40 CFR §63.3931(a) through (c)

Compliance Method: Records must be maintained and kept available for review by Division staff as specified above.

F1-14. The permittee must meet the requirements of paragraphs (1) through (4) of this condition upon startup of a reconstructed affected source.

(1) All emission capture systems, add-on control devices, and CPMS must be installed and operating upon startup of the source. The permittee must conduct according to the schedule in subparagraphs (a) through (d) of this paragraph initial and periodic performance tests of each capture system and add-on control device according to Conditions F1-18, F1-19, and F1-20 and establish the operating limits required by Condition F1-6. For magnet wire coating operations, the permittee may, with approval, conduct a performance test of one representative magnet wire coating machine for each group of identical or very similar magnet wire coating machines.

(a) The permittee must conduct the initial performance test and establish the operating limits required by Condition F1-6 no later than 180 days after initial startup.

(b) The permittee must conduct periodic performance tests and establish the operating limits required by Condition F1-6 within five years following the previous performance test. The permittee must conduct the first periodic performance test before July 8, 2023, unless the permittee is already required to complete periodic performance tests and has conducted a performance test on or after July 8, 2018. Thereafter, the permittee must conduct a performance test no later than five years following the previous performance test. Operating limits must be confirmed or reestablished during each performance test. For any control device for which the permittee uses the catalytic oxidizer control option in Condition F1-21 and following the catalyst maintenance procedures in Condition F1-21, the permittee is not required to conduct periodic control device performance testing as specified by this subparagraph. For any control device for which instruments are used to continuously measure organic compound emissions, the permittee is not required to conduct periodic control device performance testing as specified by this subparagraph.

(2) The permittee must develop and begin implementing the work practice plan required by Condition F1-7 upon initial startup of the reconstructed source.

(3) The permittee must complete the initial compliance demonstration for the initial compliance period according to the requirements of Condition F1-16. The initial compliance period begins on the startup date and ends on the last day of the 12th month following the startup date. If the startup date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. The permittee must determine the mass of organic HAP emissions and volume of coatings solids used each month and then calculate an
organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes
the results of emission capture system and add-on control device performance tests conducted according to Conditions
F1-18, F1-19, and F1-20; calculations according to Condition F1-16, and supporting documentation showing that
during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission
limit in Condition F1-4; the operating limits established during the performance tests and the results of the continuous
parameter monitoring required by Condition F1-22 and documentation of whether the permittee developed and
implemented the work practice plan required by Condition F1-7.

(4) The permittee does not need to comply with the operating limits for the emission capture system and add-on control
device required by Condition F1-6, until after completion of the performance tests specified in paragraph (1) of this
condition. Instead, the permittee must maintain a log detailing the operation and maintenance of the emission capture
system, add-on control device, and continuous parameter monitors during the period between the startup date and the
performance test. The permittee must begin complying with the operating limits for the affected source on the date of
completion of the performance tests specified in paragraph (1) of this condition. For magnet wire coating operations,
the permittee must begin complying with the operating limits for all identical or very similar magnet wire coating
machines on the date of completion of the performance test of a representative magnet wire coating machine.

40 CFR §63.3960(a)

Compliance Method: Compliance with this condition shall be assured by the recordkeeping required by Condition F1-12.

F1-15. The permittee must conduct, according to the schedule in paragraph (1) below, periodic performance tests of each capture
system and add-on control device according to the procedures in Conditions F1-18, F1-19, and F1-20 and establish the
operating limits required by Condition F1-6. For magnet wire coating operations, the permittee may, with approval, conduct
a performance test of a single magnet wire coating machine that represents identical or very similar magnet wire coating
machines.

(1) The permittee must conduct periodic performance tests and establish the operating limits required by Condition F1-6
within five years following the previous performance test. The permittee must conduct the first periodic performance
test before July 8, 2023, unless a performance test was conducted on or after July 8, 2018. Thereafter the permittee must
conduct a performance test no later than five years following the previous performance test. Operating limits must be
confirmed or reestablished during each performance test. For any control device for which the catalytic oxidizer control
option at Condition F1-21 is being used and the catalyst maintenance procedures in Condition F1-21 are being
followed, the permittee is not required to conduct periodic control device performance testing as specified by this
paragraph. For any control device for which instruments are used to continuously measure organic compound emissions,
the permittee is not required to conduct periodic control device performance testing as specified by this subparagraph.

40 CFR §63.3960(b)

Compliance Method: Compliance with this condition shall be assured by conducting the periodic performance testing
according to the specified schedule and maintaining the records required by Condition F1-12.

F1-16. The permittee shall demonstrate initial compliance for any reconstructed source by means of the following methods:

(1) The permittee may use the emission rate with add-on controls option for any coating operation, for any group of coating
operations in the affected source, or for all of the coating operations in the affected source. The permittee may include
both controlled and uncontrolled coating operations in a group for which this option is used. To demonstrate initial
compliance, the coating operation(s) for which the permittee uses the emission rate with add-on controls option must
meet the applicable emission limitations in Conditions F1-4, F1-6, and F1-7. The permittee must meet all the
requirements of this condition. It is not required to redetermine the mass of organic HAP in coatings, thinners and/or
other additives, or cleaning materials that have been reclaimed onsite (or reclaimed off-site if there is documentation
showing that the permittee received back the exact same materials that were sent off-site) and reused in the coatings
operation(s) for which the emission rate with add-on controls option is used. If coatings, thinners and/or other additives,
or cleaning materials that have been reclaimed on-site are used, the amount of each used in a month may be reduced by
the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for
materials that are reclaimed.

(2) Except as provided in Condition F1-14(4), the permittee must establish and demonstrate continuous compliance during
the initial compliance period with the operating limits required by Condition F1-6, using the procedures specified in
Conditions F1-21 and F1-22.

(3) The permittee must develop, implement, and document implementation of the work practice plan required by Condition
F1-7 during the initial compliance period, as specified in Condition F1-12.
(4) The permittee must follow the procedures in paragraphs (5) through (12) of this condition to demonstrate compliance with the applicable emission limit in Condition F1-4 for each affected source in each subcategory.

(5) Determine the mass fraction of organic HAP, density, volume used, and volume fraction of coating solids. Follow the procedures specified in §63.3951(a) through (d) to determine the mass fraction of organic HAP, density, and volume of each coating, thinner and/or other additive, and cleaning material used during each month; and the volume fraction of coating solids for each coating used during each month.

(6) Calculate the total mass of organic HAP emissions before add-on controls. Using Equation 1 of §63.3951, calculate the total mass of organic HAP emissions before add-on controls from all coatings, thinners and/or other additives, and cleaning materials used during each month in the coating operation or group of coating operations for which the emission rate with add-on controls option is used.

(7) Calculate the organic HAP emission reduction for each controlled coating operation. Determine the mass of organic HAP emissions reduced for each controlled coating operation during each month. The emission reduction determination quantifies the total organic HAP emissions that pass through the emission capture system and are destroyed or removed by the add-on control device. Use the procedures in paragraph (8) of this condition to calculate the mass of organic HAP emission reduction for each controlled coating operation using an emission capture system and add-on control device.

(8) Calculate the organic HAP emission reduction for each controlled coating operation not using liquid-liquid material balance. Use Equation 1 of §63.3961 to calculate the organic HAP emission reduction for each controlled coating operation using an emission capture system and add-on control device. The calculation applies the emission capture system efficiency and add-on control device efficiency to the mass of organic HAP contained in the coatings, thinners and/or other additives, and cleaning materials that are used in the coating operation served by the emission capture system and add-on control device during each month. The permittee must assume zero efficiency for the emission capture system and add-on control device for any period of time a deviation specified in Condition F1-17(3) or (4) occurs in the controlled coating operation, including a deviation during a period of startup, shutdown, or malfunction, unless there is other data indicating the actual efficiency of the emission capture system and add-on control device and the use of these data is approved by the Technical Secretary. Equation 1 of §63.3961 treats the materials used during such a deviation as if they were used on an uncontrolled coating operation for the time period of the deviation.

(9) Calculate the total volume of coating solids used. Determine the total volume of coating solids used, in gallons, which is the combined volume of coating solids for all the coatings used during each month in the coating operation or group of coating operations for which the emission rate with add-on controls option is used, using Equation 2 of §63.3951.

(10) Calculate the mass of organic HAP emissions for each month. Determine the mass of organic HAP emissions, in pounds, for each month, using Equation 4 of §63.3961.

(11) Calculate the organic HAP emission rate for the compliance period. Determine the organic HAP emission rate for the compliance period, in pounds of organic HAP emitted per gallon coating solids used, using Equation 5 of §63.3961.

(12) Compliance demonstration. The organic HAP emission rate for the initial compliance period, calculated using Equation 5 of §63.3961, must be less than or equal to the applicable emission limit in Condition F1-4. The permittee must keep all records as required by Conditions F1-12 and F1-13. As part of the notification of compliance status required by Condition F1-10, the permittee must identify the coating operation(s) for which the emission rate with add-on controls option was used and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in Condition F1-4, and the operating limits required by Condition F1-6 and the work practice standards required by Condition F1-7 were achieved.

40 CFR §63.3961

Compliance Method: Compliance with these requirements shall be assured by submittal of the notifications required by Condition F1-10 and maintaining the records required by Condition F1-12.

F1-17. The permittee shall demonstrate continuous compliance with the emission limitations for this source as follows:

(1) To demonstrate continuous compliance with the applicable emission limit in Condition F1-4, the organic HAP emission rate for each compliance period, determined according to the procedures in Condition F1-16, must be equal to or less than the applicable emission limit in Condition F1-4. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in Condition F1-14 is the end of a compliance period consisting of that month and the preceding 11 months. The permittee must perform the calculations in Condition F1-16 on a monthly basis using data from the previous 12 months of operation.

(2) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in Condition F1-4, this is a deviation from the emission limitation for that compliance period that must be reported as specified in Conditions F1-10(3)(f) and F1-11(5).

(3) The permittee must demonstrate continuous compliance with each operating limit required by Condition F1-6 that applies, as specified in Table 1 to Subpart MMMM (Attachment 2), when the coating line is in operation.
(a) If an operating parameter is out of the allowed range specified in Table 1 to Subpart MMMM (Attachment 2), this is a deviation from the operating limit that must be reported as specified in Conditions F1-10(3)(f) and F1-11(5).

(b) If an operating parameter deviates from the operating limit specified in Table 1 to Subpart MMMM (Attachment 2), then it must be assumed that the emission capture system and add-on control device were achieving zero efficiency during the time period of the deviation, unless there is other data indicating the actual efficiency of the emission capture system and add-on control device and the use of these data is approved by the Technical Secretary.

(4) The permittee must meet the requirements for bypass lines in Condition F1-22(2) for controlled coating operations for which liquid-liquid material balances are not conducted. If any bypass line is opened and emissions are diverted to the atmosphere when the coating operation is running, this is a deviation that must be reported as specified in Conditions F1-10(3)(f) and F1-11(5). For the purposes of completing the compliance calculations specified in Condition F1-15(8), the permittee must treat the materials used during a deviation on a controlled coating operation as if they were used on an uncontrolled coating operation for the time period of the deviation as indicated in Equation 1 of §63.3961.

(5) The permittee must demonstrate continuous compliance with the work practice standards in Condition F1-7. If a work practice plan was not developed, or if the plan was not implemented, or if the records required by Condition F1-12(10)(h) were not kept, this is a deviation from the work practice standards that must be reported as specified in Conditions F1-10(3)(f) and F1-11(5).

(6) As part of each semiannual compliance report required by Condition F1-11, the permittee must identify the coating operation(s) for which the emission rate with add-on controls option was used. If there were no deviations from the emission limitation in Condition F1-4, the operating limits in Condition F1-6, and the work practice standards in Condition F1-7, the permittee must submit a statement that the facility was in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in Condition F1-4, and the operating limits required by Condition F1-6 and the work practice standards required by Condition F1-7 were achieved during each compliance period.

(7) Deviations that occur due to malfunction of the emission capture system, add-on control device, or coating operation that may affect emission capture or control device efficiency are required to operate in accordance with Condition F1-8. The Technical Secretary will determine whether the deviations are violations according to the provisions in Condition F1-8.

(8) The permittee must maintain records as specified in Conditions F1-12 and F1-13.

40 CFR §63.3963

Compliance Method: Compliance with these requirements shall be assured by maintaining the records required by Condition F1-12.

F1-18. The permittee shall comply with the following requirements for performance tests:

(1) The permittee must conduct each performance test required by Conditions F1-14 and F1-15 according to the requirements in §63.7(e)(1) and under the conditions specified in subparagraphs (a) and (b) below, unless a waiver of the performance test is obtained according to the provisions in 40 CFR §63.7(h).

(a) Representative coating operation operating conditions. The permittee must conduct the performance test under representative operating conditions for the coating operation. Operations during periods of startup, shutdown, or malfunction and during periods of nonoperation do not constitute representative conditions. The permittee may not conduct performance tests during periods of malfunction. The permittee must record the process information that is necessary to document operating conditions during the test and explain why the conditions represent normal operation. Upon request, the permittee must make available to the Technical Secretary such records as may be necessary to determine the conditions of performance tests.

(b) Representative emission capture system and add-on control device operating conditions. The permittee must conduct the performance test when the emission capture system and add-on control device are operating at a representative flow rate, and the add-on control device is operating at a representative inlet concentration. The permittee must record information that is necessary to document emission capture system and add-on control device operating conditions during the test and explain why the conditions represent normal operation.

(2) The permittee must conduct each performance test of an emission capture system according to the requirements in Condition F1-19. The permittee must conduct each performance test of an add-on control device according to the requirements in Condition F1-20.
40 CFR §63.3964

Compliance Method: Compliance with this requirement shall be assured by conducting the required performance tests as specified and maintaining the records required by Condition F1.12.

F1-19. The permittee must use the procedures and test methods in this condition to determine capture efficiency as part of the performance tests required by Conditions F1-14 and F1-15.

1) Assuming 100 percent capture efficiency. The permittee may assume the capture system efficiency is 100 percent if both of the conditions in subparagraphs (a) and (b) of this condition are met:

   (a) The capture system meets the criteria in Method 204 of Appendix M to 40 CFR Part 51 for a PTE and directs all the exhaust gases from the enclosure to an add-on control device.

   (b) All coatings, thinners and/or other additives, and cleaning materials used in the coating operation are applied within the capture system; coating solvent flash-off, curing, and drying occurs within the capture system; and the removal or evaporation of cleaning materials from the surfaces they are applied to occurs within the capture system. For example, this criterion is not met if parts enter the open shop environment when being moved between a spray booth and a curing oven.

2) Measuring capture efficiency. If the capture system does not meet both of the criteria in subparagraphs (1)(a) and (b) above, then the permittee must use one of the three protocols described in paragraphs (3), (4), and (5) of this condition to measure capture efficiency. The capture efficiency measurements use total volatile hydrocarbon (TVH) capture efficiency as a surrogate for organic HAP capture efficiency. For the protocols in paragraphs (3) and (4) below, the capture efficiency measurement must consist of three test runs. Each test run must be at least 3 hours duration or the length of a production run, whichever is longer, up to 8 hours. For the purposes of this test, a production run means the time required for a single part to go from the beginning to the end of the production, which includes surface preparation activities and drying and curing time.

3) Liquid-to-uncaptured-gas protocol using a temporary total enclosure or building enclosure. The liquid-to-uncaptured-gas protocol compares the mass of liquid TVH in materials used in the coating operation to the mass of TVH emissions not captured by the emission capture system. Use a temporary total enclosure or a building enclosure and the procedures in items (a) through (f) below to measure emission capture system efficiency using the liquid-to-uncaptured-gas protocol.

   (a) Either use a building enclosure or construct an enclosure around the coating operation where coatings, thinners and/or other additives, and cleaning materials are applied, and all areas where emissions from these applied coatings and materials subsequently occur, such as flash-off, curing, and drying areas. The areas of the coating operation where capture devices collect emissions for routing to an add-on control device, such as the entrance and exit areas of an oven or spray booth, must also be inside the enclosure. The enclosure must meet the applicable definition of a temporary total enclosure or building enclosure in Method 204 of Appendix M to 40 CFR Part 51.

   (b) Use Method 204A or 204F of Appendix M to 40 CFR Part 51 to determine the mass fraction of TVH liquid input from each coating, thinner and/or other additive, and cleaning material used in the coating operation during each capture efficiency test run. To make the determination, substitute TVH for each occurrence of the term VOC in the methods.

   (c) Use Equation 1 of §63.3965 to calculate the total mass of TVH liquid input from all the coatings, thinners and/or other additives, and cleaning materials used in the coating operation during each capture efficiency test run.

   (d) Use Method 204D or 204E of Appendix M to 40 CFR Part 51 to measure the total mass, kg, of TVH emissions that are not captured by the emission capture system. They are measured as they exit the temporary total enclosure or a building enclosure during each capture efficiency test run. To make the measurement, substitute TVH for each occurrence of the term VOC in the methods.

   (i) Use Method 204D of appendix M to 40 CFR Part 51 if the enclosure is a temporary total enclosure.

   (ii) Use Method 204E of appendix M to 40 CFR 51 if the enclosure is a building enclosure. During the capture efficiency measurement, all organic compound emitting operations inside the building enclosure, other than the coating operation for which capture efficiency is being determined, must be shut down, but all fans and blowers must be operating normally.

   (e) For each capture efficiency test run, determine the percent capture efficiency of the emission capture system using Equation 2 of §63.3965.

   (f) Determine the capture efficiency of the emission capture system as the average of the capture efficiencies measured in the three test runs.

4) Gas-to-gas protocol using a temporary total enclosure or building enclosure. The gas-to-gas protocol compares the mass of TVH emissions captured by the emission capture system to the mass of TVH emissions not captured. Use a temporary total enclosure or a building enclosure and the procedures in subparagraphs (a) through (e) below to measure emission capture system efficiency using the gas-to-gas protocol.

   (a) Either use a building enclosure or construct an enclosure around the coating operation where coatings, thinners and/or other additives, and cleaning materials are applied, and all areas where emissions from these applied coatings and materials subsequently occur, such as flash-off, curing, and drying areas. The areas of the coating
operation where capture devices collect emissions generated by the coating operation for routing to an add-on control device, such as the entrance and exit areas of an oven or a spray booth, must also be inside the enclosure. The enclosure must meet the applicable definition of a temporary total enclosure or building enclosure in Method 204 of Appendix M to 40 CFR Part 51.

(b) Use Method 204B or 204C of Appendix M to 40 CFR Part 51 to measure the total mass, kg, of TVH emissions captured by the emission capture system during each capture efficiency test run as measured at the inlet to the add-on control device. To make the measurement, substitute TVH for each occurrence of the term VOC in the methods.

(i) The sampling points for the Method 204B or 204C measurement must be upstream from the add-on control device and must represent total emissions routed from the capture system and entering the add-on control device.

(ii) If multiple emission streams from the capture system enter the add-on control device without a single common duct, then the emissions entering the add-on control device must be simultaneously measured in each duct and the total emissions entering the add-on control device must be determined.

(c) Use Method 204D or 204E of Appendix M to 40 CFR Part 51 to measure the total mass, kg, of TVH emissions that are not captured by the emission capture system; they are measured as they exit the temporary total enclosure or building enclosure during each capture efficiency test run. To make the measurement, substitute TVH for each occurrence of the term VOC in the methods.

(i) Use Method 204D of Appendix M to 40 CFR Part 51 if the enclosure is a temporary total enclosure.

(ii) Use Method 204E of Appendix M to 40 CFR Part 51 if the enclosure is a building enclosure. During the capture efficiency measurement, all organic compound emitting operations inside the building enclosure, other than the coating operation for which capture efficiency is being determined, must be shut down, but all fans and blowers must be operating normally.

(d) For each capture efficiency test run, determine the percent capture efficiency of the emission capture system using Equation 3 of §63.3965.

(e) Determine the capture efficiency of the emission capture system as the average of the capture efficiencies measured in the three test runs.

(5) Alternative capture efficiency protocol. As an alternative to the procedures specified in paragraphs (3) and (4) of this condition and subject to the approval of the Technical Secretary, the permittee may determine capture efficiency using any other capture efficiency protocol and test methods that satisfy the criteria of either the DQO or LCL approach as described in Appendix A to 40 CFR 63, Subpart KK.

40 CFR §63.3965

Compliance Method: Compliance with these requirements shall be assured by the recordkeeping required by Condition F1-12.

F1-20. The permittee shall use the procedures and test methods in §63.3966 to determine the add-on control device emission destruction or removal efficiency as part of the performance tests required by Conditions F1-14 and F1-15. For each performance test, the permittee must conduct three test runs as specified in 40 CFR §63.7(e)(3) and each test run must last at least one hour. If the source is a magnet wire coating machine, the permittee may use the procedures in Section 3.0 of Appendix A (see Attachment 3) to Subpart MMMM as an alternative.

40 CFR §63.3966

Compliance Method: Compliance with these requirements shall be assured by conducting the performance tests as specified.

F1-21. During the performance tests required by Conditions F1-14 and F1-15 and described in Conditions F1-18, F1-19, and F1-20, the permittee must establish the operating limits required by Condition F1-6 according to this condition, unless approval has been received for alternative monitoring and operating limits under §63.8(f) as specified in Condition F1-6.

(1) If the add-on control device is a thermal oxidizer, the permittee must establish the operating limits according to subparagraphs (a) and (b) below.

(a) During the performance test, the permittee must monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. The permittee must monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.

(b) The permittee must use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for the thermal oxidizer.
(2) If the add-on control device is a catalytic oxidizer, the permittee shall establish the operating limits according to either subparagraphs (a) and (b) below or subparagraphs (c) and (d) below. For the magnet wire coating machines at this facility, the permittee may use the procedures in Section 3.0 of Appendix A (Attachment 3) to Subpart MMMM as an alternative.

(a) During performance tests, the permittee must monitor and record the temperature just before the catalyst bed and the temperature difference across the catalyst bed at least once every 15 minutes during each of the three test runs.

(b) For each performance test, the permittee shall use the data collected during the performance test to calculate and record the average temperature just before the catalyst bed and the average temperature difference across the catalyst bed maintained during the performance test. These are the minimum operating limits for the catalytic oxidizer.

(c) The permittee must monitor the temperature at the inlet to the catalyst bed and implement a site-specific inspection and maintenance plan for the catalytic oxidizer as specified in subparagraph (d). During the performance test, the permittee must monitor and record the temperature just before the catalyst bed at least once every 15 minutes during each of the three test runs. For each performance test, use the data collected during the performance test to calculate and record the average temperature just before the catalyst bed during the performance test. This is the minimum operating limit for the catalytic oxidizer.

(d) The permittee must develop and implement an inspection and maintenance plan for the catalytic oxidizer(s) for which the permittee elects to monitor according to subparagraph (c). The plan must address, at a minimum, the elements specified in parts (i) through (iii) below

(i) Annual sampling and analysis of the catalyst activity (i.e., conversion efficiency) following the manufacturer's or catalyst supplier's recommended procedures. If problems are found during the catalyst activity test, the permittee must replace the catalyst bed or take other corrective action consistent with the manufacturer's recommendations.

(ii) Monthly external inspection of the catalytic oxidizer system, including the burner assembly and fuel supply lines for problems and, as necessary, adjust the equipment to assure proper air-to-fuel mixtures.

(iii) Annual internal inspection of the catalyst bed to check for channeling, abrasion, and settling. If problems are found during the annual internal inspection of the catalyst, the permittee must replace the catalyst bed or take other corrective action consistent with the manufacturer's recommendations. If the catalyst bed is replaced and is not of like or better kind and quality as the old catalyst, then the permittee must conduct a new performance test to determine destruction efficiency according to Condition F1-20. If a catalyst bed is replaced and the replacement catalyst is of like or better kind and quality as the old catalyst, then a new performance test to determine destruction efficiency is not required and the permittee may continue to use the previously established operating limits for that catalytic oxidizer.

(3) For each capture device that is not part of a PTE that meets the criteria of Condition F1-19(1), the permittee shall establish an operating limit for either the gas volumetric flow rate or duct static pressure, as specified in subparagraphs (a) and (b) below. The operating limit for a PTE is specified in Table 1 to Subpart MMMM of Part 63 (Attachment 2). If the source is a magnet wire coating machine, the permittee may use the procedures in Section 2.0 of Appendix A (Attachment 3) to Subpart MMMM of Part 63 as an alternative.

(a) During the capture efficiency determination required by Condition F1-14 and described in Conditions F1-18 and F1-19, the permittee must monitor and record either the gas volumetric flow rate or the duct static pressure for each separate capture device in the emission capture system at least once every 15 minutes during each of the three test runs at a point in the duct between the capture device and the add-on control device inlet.

(b) The permittee shall calculate and record the average gas volumetric flow rate or duct static pressure for the three test runs for each capture device. This average gas volumetric flow rate or duct static pressure is the minimum operating limit for that specific capture device.

40 CFR §63.3967

Compliance method: Compliance with these requirements shall be assured by the reporting required by Condition F1-11.

F1-22. The permittee must comply with the following requirements for continuous monitoring systems:

(1) The permittee must install, operate, and maintain each continuous parameter monitoring system (CPMS) specified in paragraphs (3) and (4) according to according to subparagraphs (a) through (f) below. The permittee must install, operate, and maintain each CPMS specified in paragraph (2) according to subparagraphs (c) through (e) below.

(a) The CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. There must be a minimum of four equally spaced successive cycles of CPMS operation in 1 hour.

(b) The permittee must determine the average of all recorded readings for each successive 3-hour period of the emission capture system and add-on control device operation.

(c) The permittee must record the results of each inspection, calibration, and validation check of the CPMS.
The permittee must maintain the CPMS at all times in accordance with Condition F1-8 and keep necessary parts readily available for routine repairs of the monitoring equipment.

The permittee must operate the CPMS and collect emission capture system and add-on control device parameter data at all times in accordance with Condition F1-8.

The permittee must not use emission capture system or add-on control device parameter data recorded during monitoring failures, associated repairs, out-of-control periods, or required quality assurance or control activities when calculating data averages. The permittee must use all the data collected during all other periods in calculating the data averages for determining compliance with the emission capture system and add-on control device operating limits.

A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the CPMS to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Except for periods of required quality assurance or control activities, any period for which the CPMS fails to operate and record data continuously as required by subparagraph (1)(e) of this condition, or generates data that cannot be included in calculating averages as specified in subparagraph (1)(f) of this condition constitutes a deviation from the monitoring requirements.

(2) Capture system bypass line. The permittee must meet the requirements of subparagraphs (a) and (b) below for each emission capture system that contains bypass lines that could divert emissions away from the add-on control device to the atmosphere.

(a) The permittee must monitor or secure the valve or closure mechanism controlling the bypass line in a nondiverting position in such a way that the valve or closure mechanism cannot be opened without creating a record that the valve was opened. The method used to monitor or secure the valve or closure mechanism must meet one of the requirements specified in parts (i) through (v) below.

(i) Flow control position indicator. Install, calibrate, maintain, and operate according to the manufacturer's specifications a flow control position indicator that takes a reading at least once every 15 minutes and provides a record indicating whether the emissions are directed to the add-on control device or diverted from the add-on control device. The time of occurrence and flow control position must be recorded, as well as every time the flow direction is changed. The flow control position indicator must be installed at the entrance to any bypass line that could divert the emissions away from the add-on control device to the atmosphere.

(ii) Car-seal or lock-and-key valve closures. Secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. The permittee must visually inspect the seal or closure mechanism at least once every month to ensure that the valve is maintained in the closed position, and the emissions are not diverted away from the add-on control device to the atmosphere.

(iii) Valve closure monitoring. Ensure that any bypass line valve is in the closed (nondiverting) position through monitoring of valve position at least once every 15 minutes. The permittee must inspect the monitoring system at least once every month to verify that the monitor will indicate valve position.

(iv) Automatic shutdown system. Use an automatic shutdown system in which the coating operation is stopped when flow is diverted by the bypass line away from the add-on control device to the atmosphere when the coating operation is running. The permittee must inspect the automatic shutdown system at least once every month to verify that it will detect diversions of flow and shut down the coating operation.

(v) Flow direction indicator. Install, calibrate, maintain, and operate according to the manufacturer's specifications a flow direction indicator that takes a reading at least once every 15 minutes and provides a record indicating whether the emissions are directed to the add-on control device or diverted from the add-on control device. Each time the flow direction changes, the next reading of the time of occurrence and flow direction must be recorded. The flow direction indicator must be installed in each bypass line or air makeup supply line that could divert the emissions away from the add-on control device to the atmosphere.

(b) If any bypass line is opened, the permittee must include a description of why the bypass line was opened and the length of time it remained open in the semiannual compliance reports required in Condition F1-11.

(3) Thermal oxidizers and catalytic oxidizers. If the permittee is using a thermal oxidizer or catalytic oxidizer as an add-on control device, (including those used with concentrators or with carbon adsorbers to treat desorbed concentrate streams), the permittee must comply with the requirements in subparagraphs (a) through (c) below:

(a) For a thermal oxidizer, install a gas temperature monitor in the firebox of the thermal oxidizer or in the duct immediately downstream of the firebox before any substantial heat exchange occurs.

(b) For a catalytic oxidizer, install gas temperature monitors upstream and/or downstream of the catalyst bed as required in Condition F1-21(2).

(c) For all thermal oxidizers and catalytic oxidizers, the permittee must meet the requirements in paragraph (1) of this condition and parts (i) through (v) below for each gas temperature monitoring device. For the purposes of this paragraph, a thermocouple is part of the temperature sensor.

(i) Locate the temperature sensor in a position that provides a representative temperature.
(ii) Use a temperature sensor with a measurement sensitivity of 5 degrees Fahrenheit or 1.0 percent of the temperature value, whichever is larger.

(iii) Before using the sensor for the first time or when relocating or replacing the sensor, perform a validation check by comparing the sensor output to a calibrated temperature measurement device or by comparing the sensor output to a simulated temperature.

(iv) Conduct an accuracy audit every quarter and after every deviation. Accuracy audit methods include comparisons of sensor output to redundant temperature sensors, to calibrated temperature measurement devices, or to temperature simulation devices.

(v) Conduct a visual inspection of each sensor every quarter if redundant temperature sensors are not used.

(4) Emission capture systems. The capture system monitoring system must comply with the applicable requirements in items subparagraphs (a) and (b) below. If the source is a magnet wire coating machine, the permittee may use the procedures in Section 2.0 of Appendix A to Subpart MMMM (Attachment 3) as an alternative.

(a) For each flow measurement device, the permittee must meet the requirements in paragraph (1) of this condition and parts (i) through (vii) below:

(i) Locate a flow sensor in a position that provides a representative flow measurement in the duct from each capture device in the emission capture system to the add-on control device.

(ii) Use a flow sensor with an accuracy of at least 10 percent of the flow.

(iii) Perform an initial sensor calibration in accordance with the manufacturer's requirements.

(iv) Perform a validation check before initial use or upon relocation or replacement of a sensor. Validation checks include comparison of sensor values with electronic signal simulations or via relative accuracy testing.

(v) Conduct an accuracy audit every quarter and after every deviation. Accuracy audit methods include comparisons of sensor values with electronic signal simulations or via relative accuracy testing.

(vi) Perform leak checks monthly.

(vii) Perform visual inspections of the sensor system quarterly if there is no redundant sensor.

(b) For each pressure drop measurement device, the permittee must comply with the requirements in paragraph (1) of this condition and parts (i) through (vii) below.

(i) Locate the pressure sensor(s) in or as close to a position that provides a representative measurement of the pressure drop across each opening that is being monitored.

(ii) Use a pressure sensor with an accuracy of at least 0.5 inches of water column or 5 percent of the measured value, whichever is larger.

(iii) Perform an initial calibration of the sensor according to the manufacturer's requirements.

(iv) Conduct a validation check before initial operation or upon relocation or replacement of a sensor. Validation checks include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.

(v) Conduct accuracy audits every quarter and after every deviation. Accuracy audits include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.

(vi) Perform monthly leak checks on pressure connections. A pressure of at least 1.0 inches of water column to the connection must yield a stable sensor result for at least 15 seconds.

(vii) Perform a visual inspection of the sensor at least monthly if there is no redundant sensor.

40 CFR §63.3968

Compliance Method: Compliance with these requirements shall be assured by maintaining the records required by Condition F1-12.

E4. Source-Specific Permit Requirements

<table>
<thead>
<tr>
<th>94-0072-05 RACT</th>
<th>Twelve Magnet Wire Coating Process Lines (Ovens 201-212):</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Each magnet wire coating process line consists of (one or two) annealing furnaces, enamel application, enamel curing ovens, incinerator control, dri-lube application, and associated cleaning solvent equipment. Each line has a heat input rate of 2.0 MMBtu/hr, except for the modified lines (203 and 206) which each have a heat input rate of 1.1 MMBtu/hr.</td>
</tr>
<tr>
<td></td>
<td>Currently, there are 24 curing ovens associated with the 12 process lines. Exhaust from the Dri-lube application process is ducted back to the curing ovens.</td>
</tr>
<tr>
<td></td>
<td>There are a total of 21 annealing ovens.</td>
</tr>
</tbody>
</table>
Units 203 and 206 have catalyst control and use a catalytic oxidizer for controlling VOC and organic HAP emissions. All other units (201, 202, 204, 205, 307, 208, 209, 210, 211, and 212) use a thermal oxidizer for controlling VOC and organic HAP emissions. All ovens are vertical configuration.

40 CFR 63, Subpart MMMM applies to this source.

**Conditions E4-1 through E4-5 apply to source 94-0072-05.**

**E4-1.** The maximum design heat input rate for all twelve magnet wire coating lines combined is 22.2 MMBtu/hr. Should the permittee need to modify the magnet wire lines in a manner that increases the maximum design heat input rate, the permittee shall pursue the appropriate Title V procedure in accordance with TAPCR 1200-03-09-.02(11). If a construction permit is applied for, this shall be done in accordance with TAPCR 1200-03-09-.01. This value does not include annealing ovens or the heat value of solvents from coatings and associated thinners.

TAPCR 1200-03-09-.03(8) and the application dated October 30, 2020

**Compliance Method:** The permittee shall maintain documentation to demonstrate the heat input rate for each oven. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

**E4-2.** Natural gas only shall be used as fuel(s) for this source. Should the permittee need to modify the source to allow the use of a fuel other than natural gas, the permittee shall pursue the appropriate Title V procedure in accordance with TAPCR 1200-03-09-.02(11). If a construction permit is applied for, this shall be done in accordance with TAPCR 1200-03-09-.01.

TAPCR 1200-03-09-.03(8)

**Compliance Method:** The permittee shall maintain documentation to demonstrate the type(s) of fuel used by the source. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

**E4-3.** Particulate matter (PM) emitted from this source shall not exceed 0.02 grains per dry standard cubic foot (gr/dscf) of exhaust gas (1.63 pounds per hour on a daily average basis).

TAPCR 1200-03-07-.04(1)

**Compliance Method:** Compliance with this condition is assured by compliance with Conditions E4-1 and E4-2 and by using the PM (Total) emission factor of 7.6 pounds per MMScf of natural gas combusted from AP-42 Table 1.4-2.

**E4-4.** Sulfur dioxide emitted from this source shall not exceed 0.1 pounds per hour.

TAPCR 1200-03-14-.01(3) and the agreement letter dated August 7, 1997 (Attachment 5)

**Compliance Method:** Compliance with this condition is assured by compliance with Conditions E4-1 and E4-2 and by using the SO₂ emission factor of 0.6 pounds per MMScf of natural gas combusted from AP-42 Table 1.4-2.

**E4-5.** Pursuant to Tennessee Air Pollution Control Board Order 94-14, dated April 13, 1994, Reasonably Available Control Technology (RACT) is stipulated for VOC emission control on lubricant application by the following conditions. This requirement only applies to Ovens 204, 208, 210, 211, and 212.

(a) Lubricant shall be applied by wick applicator or an alternative method that achieves equal or greater reduction in emissions.
(b) The VOC content of the lubricant shall not exceed 5.87 pounds per gallon, as applied, excluding water and/or exempt compounds.
(c) In addition to satisfying the requirements of Paragraphs 1200-03-18-.03(1) and (3) of the Tennessee Air Pollution Control Regulations, records shall be maintained of the quantity of lubricant used per calendar month. Each record shall
be kept for at least five years and shall be made available to the Technical Secretary or a Division representative upon request.

(d) By March 31 of each year, a report shall be submitted to the Technical Secretary of the results of research and development in reducing VOC emissions from the lubricant application operation and of reductions achieved by implementation of new emission reduction methods.

TAPCR 1200-03-09-.03(8)

<table>
<thead>
<tr>
<th>Permit Number 578641</th>
<th>Expiration Date: DRAFT</th>
</tr>
</thead>
<tbody>
<tr>
<td>94-0072-06 RACT</td>
<td></td>
</tr>
<tr>
<td>Six Magnet Wire</td>
<td></td>
</tr>
<tr>
<td>Coating Process Lines</td>
<td></td>
</tr>
<tr>
<td>(Ovens 301-306)</td>
<td>Each magnet wire coating process line consists of one annealing furnace, enamel application, enamel curing ovens, incinerator control, dri-lube application (there is no capture/enclosure control for the dri-lube application planned), and associated cleaning solvent equipment.</td>
</tr>
<tr>
<td></td>
<td>Currently, there are six lines. There is one oven associated with each line, for a total of six ovens. Each line has a heat input rate of 1.1 MMBtu/hr. There is one annealer for each oven for a total of six annealers. Each gas-ired annealing oven has a heat input capacity of 200,000 Btu per hour and is considered to be “insignificant” for permitting purposes. There is no enclosure for Dri-lube capture here. All other units have thermal control. All ovens have horizontal configuration.</td>
</tr>
<tr>
<td></td>
<td>40 CFR 63, Subpart MMMM applies to this source.</td>
</tr>
</tbody>
</table>

### Conditions E5-1 through E5-5 apply to source 94-0072-06.

**E5-1.** The maximum design heat input rate for all six magnet wire coating lines combined is 6.6 MMBtu/hr. Should the permittee need to modify the magnet wire lines in a manner that increases the maximum design heat input rate, the permittee shall pursue the appropriate Title V procedure in accordance with TAPCR 1200-03-09-.02(11). If a construction permit is applied for, this shall be done in accordance with TAPCR 1200-03-09-.01. This value does not include annealing ovens or the heat value of solvents from coatings and associated thinners.

TAPCR 1200-03-09-.03(8) and the application dated October 30, 2020

**Compliance Method:** The permittee shall maintain documentation to demonstrate the heat input rate for the ovens. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

**E5-2.** Natural gas only shall be used as fuel(s) for this source. Should the permittee need to modify the source to allow the use of a fuel other than natural gas, the permittee shall pursue the appropriate Title V procedure in accordance with TAPCR 1200-03-09-.02(11). If a construction permit is applied for, this shall be done in accordance with TAPCR 1200-03-09-.01.

TAPCR 1200-03-09-.03(8)

**Compliance Method:** The permittee shall maintain documentation to demonstrate the type(s) of fuel used by the source. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

**E5-3.** PM emitted from this source shall not exceed 0.02 gr/dscf of exhaust gases (2.9 lbs/hr on a daily average basis).

TAPCR 1200-03-07-.04(1)

**Compliance Method:** Compliance with this condition is assured by compliance with Conditions E5-1 and E5-2 and by using the PM (Total) emission factor of 7.6 pounds per MMScf of natural gas combusted from AP-42 Table 1.4-2.

**E5-4.** SO₂ emitted from this source shall not exceed 0.1 pounds per hour.

TAPCR 1200-03-14-.01(3) and the agreement letter dated August 7, 1997 (Attachment 5)
Compliance Method: Compliance with this condition is assured by compliance with Conditions E5-1 and E5-2 and by using the SO\textsubscript{2} emission factor of 0.6 pounds per MMScf of natural gas combusted from AP-42 Table 1.4-2.

E5-5. Pursuant to Tennessee Air Pollution Control Board Order 94-14, dated April 13, 1994, Reasonably Available Control Technology (RACT) is stipulated for VOC emission control on lubricant application by the following conditions.

(a) Lubricant shall be applied by wick applicator or an alternative method that achieves equal or greater reduction in emissions.
(b) The VOC content of the lubricant shall not exceed 5.87 pounds per gallon, as applied, excluding water and/or exempt compounds.
(c) In addition to satisfying the requirements of Paragraphs 1200-03-18-.03(1) and (3) of the Tennessee Air Pollution Control Regulations, records shall be maintained of the quantity of lubricant used per calendar month. Each record shall be kept for at least five years and shall be made available to the Technical Secretary or a Division representative upon request.
(d) By March 31 of each year, a report shall be submitted to the Technical Secretary of the results of research and development in reducing VOC emissions from the lubricant application operation and of reductions achieved by implementation of new emission reduction methods.

<table>
<thead>
<tr>
<th>94-0072-16</th>
<th>Eight Magnet Wire Coating Process Lines (Existing Lines 213-220)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Each magnet wire coating line consists of (one or two) annealing furnace(s), enamel application, enamel curing ovens, incinerator control, Dri-Lube application, and associated cleaning solvent equipment.</td>
</tr>
<tr>
<td></td>
<td>There are a total of eight ovens (each with two sides). Each oven has a heat input rate of 2.0 MMBtu/hr. There are two annealers per line for ovens 213-216 and one annealer per line for ovens 217-220. Each gas-fired annealing oven has a heat input capacity of 200,000 Btu per hour and is considered to be “insignificant” for permitting purposes. There is Dri-lube capture for all lines. All lines have thermal control, and have vertical configuration.</td>
</tr>
<tr>
<td></td>
<td>40 CFR 63, Subpart MMMM applies to this source.</td>
</tr>
</tbody>
</table>

**Conditions E6-1 through E6-4 apply to source 94-0072-16.**

E6-1. The maximum design heat input rate for all eight magnet wire coating lines is 16.0 MMBtu/hr. Should the permittee need to modify the magnet wire lines in a manner that increases the maximum design heat input rate, the permittee shall pursue the appropriate Title V procedure in accordance with TAPCR 1200-03-09-.02(11). If a construction permit is applied for, this shall be done in accordance with TAPCR 1200-03-09-.01. This value does not include annealing ovens or the heat value of solvents from coatings and associated thinners.

TAPCR 1200-03-09-.03(8)

Compliance Method: The permittee shall maintain documentation to demonstrate the heat input rate for the ovens. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

E6-2. Natural gas only shall be used as fuel(s) for this source. Should the permittee need to modify the source to allow the use of a fuel other than natural gas, the permittee shall pursue the appropriate Title V procedure in accordance with TAPCR 1200-03-09-.02(11). If a construction permit is applied for, this shall be done in accordance with TAPCR 1200-03-09-.01.

TAPCR 1200-03-09-.03(8)

Compliance Method: The permittee shall maintain documentation to demonstrate the type(s) of fuel used by the source. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

E6-3. PM emitted from this source shall not exceed 0.02 gr/dscf of exhaust gases (0.92 lbs/hr on a daily average basis).
Compliance Method: Compliance with this condition is assured by compliance with Conditions E6-1 and E6-2 and by using the PM (Total) emission factor of 7.6 pounds per MMScf of natural gas combusted from AP-42 Table 1.4-2.

E6-4. SO₂ emitted from this source shall not exceed 0.1 pounds per hour.

TAPCR 1200-03-14-.01(3) and the agreement letter dated August 7, 1997 (Attachment 5)

Compliance Method: Compliance with this condition is assured by compliance with Conditions E6-1 and E6-2 and by using the SO₂ emission factor of 0.6 pounds per MMScf of natural gas combusted from AP-42 Table 1.4-2.

| 94-0072-17 | Five Magnet Wire Coating Process Lines (Ovens 313-317): | Each magnet wire coating process line consists of electric annealing furnaces (utilizing steam blanketing for a reducing atmosphere), enamel and dri-lube coating curing ovens, and associated cleaning solvent equipment. There is one electric annealing furnace utilizing steam blanketing for a reducing atmosphere per line. Each annealing oven is considered to be “insignificant” for permitting purposes. Ovens with integral electric/catalytic heating units are used. No natural gas fuel is used at this source. Combustion which occurs here is due to the burning of solvent evaporated from coatings. There is no Dri-lube capture associated with the units that comprise this source. All units have catalytic control and are set up in a horizontal configuration. Oven 316 will utilize wax as a lubricant instead of solvent-based Dri-lube, so there will be no VOC or HAP emissions from lubricant usage in Oven 316. 40 CFR 63, Subpart MMMM applies to this source. |
| E7-1. | PM emitted from this source shall not exceed 0.02 gr/dscf of stack gases (0.05 lbs/hr on a daily average basis). | TAPCR 1200-03-07-.04(1) Compliance Method: The potential to emit particulate matter from this source is less than five tons per year. In accordance with TAPCR 1200-03-09-.04(5)(c)3 and by annual certification of compliance, the permittee shall be considered to meet the monitoring and related recordkeeping requirements of TAPCR 1200-03-09-.02(11)(e)3i. The permittee shall submit annually a compliance certification for particulate matter from this source. |
| E7-2. | Pursuant to Tennessee Air Pollution Control Board Order 94-14, dated April 13, 1994, Reasonably Available Control Technology (RACT) is stipulated for VOC emission control on lubricant application by the following conditions. | (a) Lubricant shall be applied by wick applicator or an alternative method that achieves equal or greater reduction in emissions. (b) The VOC of the lubricant shall not exceed 5.87 pounds per gallon, as applied excluding water and/or exempt compounds. (c) In addition to satisfying the requirements of Paragraphs 1200-03-18-.03(1) and (3) of the Tennessee Air Pollution Control Regulations, records shall be maintained of the quantity of lubricant used per calendar month. Each record shall be kept for at least five years and shall be made available to the Technical Secretary or a Division representative upon request. (d) By March 31 of each year, a report shall be submitted to the Technical Secretary of the results of research and development in reducing volatile organic compound emissions from the lubricant application operation and of reductions achieved by implementation of new emission reduction methods. |
| 94-0072-18 | Two Magnet Wire Coating Process Lines (Ovens 601 and 602): | Each magnet wire coating process line consists of one annealing furnace, enamel application, enamel curing ovens, incinerator control, dri-lube application, and associated cleaning solvent equipment. There are two curing ovens for each line, each with a maximum heat input of 1.6 MMBtu/hr per line (0.8 MMBtu/hr per oven), for a total of 3.2 MMBtu/hr. There is Dri- |
lube capture for all lines. There is one annealer per line. All units are V-14 vertical ovens (same as Vincennes models) with thermal control.

40 CFR 63, Subpart MMMM applies to this source.

**Conditions E8-1 through E8-3 apply to source 94-0072-18.**

**E8-1.** The maximum design heat input rate for the two magnet wire coating lines combined is 3.2 MMBtu/hr. Should the permittee need to modify the magnet wire lines in a manner that increases the maximum design heat input rate, the permittee shall pursue the appropriate Title V procedure in accordance with TAPCR 1200-03-09-.02(11). If a construction permit is applied for, this shall be done in accordance with TAPCR 1200-03-09-.01.

TAPCR 1200-03-09-.03(8)

**Compliance Method:** The permittee shall maintain documentation to demonstrate the heat input rate for the ovens. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

**E8-2.** Natural gas only shall be used as fuel(s) for this source. Should the permittee need to modify the source to allow the use of a fuel other than natural gas, the permittee shall pursue the appropriate Title V procedure in accordance with TAPCR 1200-03-09-.02(11). If a construction permit is applied for, this shall be done in accordance with TAPCR 1200-03-09-.01.

TAPCR 1200-03-09-.03(8)

**Compliance Method:** The permittee shall maintain documentation to demonstrate the type(s) of fuel used by the source. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

**E8-3.** PM emitted from this source shall not exceed 0.02 gr/dscf of exhaust gases (0.96 lbs/hr on a daily average basis).

TAPCR 1200-03-07-.04(1)

**Compliance Method:** Compliance with this condition is assured by compliance with Conditions E8-1 and E8-2 and by using the PM (Total) emission factor of 7.6 pounds per MMScf of natural gas combusted from AP-42 Table 1.4-2.

**E8-4.** SO₂ emitted from this source shall not exceed 0.1 pounds per hour.

TAPCR 1200-03-14-.03(5)

**Compliance Method:** Compliance with this condition is assured by compliance with Conditions E8-1 and E8-2 and by using the SO₂ emission factor of 0.6 pounds per MMScf of natural gas combusted from AP-42 Table 1.4-2.

94-0072-22 **Two Boilers**

This source consists of two Kewanee natural gas-fired boilers, each with a rated heat input capacity of 6.278 MMBtu/hr. These units provide process heat exclusively. Both units were installed in 1990.

40 CFR 63, Subpart DDDDD applies to this source.

**Conditions E9-1 through E9-4 apply to source 94-0072-22.**

**E9-1.** The maximum design heat input rate for each of the two boilers is 6.278 MMBtu/hr. Should the permittee need to modify the source in a manner that increases the maximum design heat input rate, the permittee shall pursue the appropriate Title V
procedure in accordance with TAPCR 1200-03-09-.02(11). If a construction permit is applied for, this shall be done in accordance with TAPCR 1200-03-09-.01.

TAPCR 1200-03-09-.03(8) and the application dated October 30, 2021

**Compliance Method:** The permittee shall maintain documentation to demonstrate the heat input capacity for the boilers. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

**E9.2.** Only natural gas shall be used as fuel for the boilers. Should the permittee need to modify the boilers to allow the use of a fuel other than natural gas, the permittee shall pursue the appropriate Title V procedure in accordance with TAPCR 1200-03-09-.02(11). If a construction permit is applied for, this shall be done in accordance with TAPCR 1200-03-09-.01.

TAPCR 1200-03-09-.03(8) and the application dated October 30, 2021

**Compliance Method:** The permittee shall maintain documentation to demonstrate the type(s) of fuel used by the boilers. Documentation shall include, but is not limited to, manufacturer’s specifications, purchase records, operating manuals, or a tag affixed to the unit by the manufacturer. These documents shall be kept readily available/accessible and made available upon request by the Technical Secretary or a Division representative.

**E9.3.** PM emitted from each boiler shall not exceed 0.1 lb/hr (0.2 lb/hr combined total) on a daily average basis.

TAPCR 1200-03-06-.01(7) and the agreement letter dated March 3, 2016 (Attachment 5)

**Compliance Method:** Compliance with this condition is assured by compliance with **Conditions E9-1 and E9-2** and by using the PM (Total) emission factor of 7.6 pounds per MMScf of natural gas combusted from AP-42 Table 1.4-2.


**F2-1.** The permittee is subject to and shall comply with all applicable provisions of 40 CFR 63, Subpart DDDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters (Subpart DDDDDD). The two boilers that comprise this source are existing affected sources in the subcategory of units designed to burn gas 1 fuels. The applicable requirements of Subpart DDDDDD are incorporated into this permit in accordance with TAPCR 1200-03-09-.03(8).

40 CFR §§63.7490(d) and 63.7499(l)

**F2-2.** The permittee must conduct a biennial tune-up of each boiler, as specified in paragraphs (1) through (6) below.

1. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the burner inspection may be performed any time prior to the tune-up or delayed until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
2. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
3. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the inspection may be delayed until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;
4. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NOx requirement to which the unit is subject;
5. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
6. Maintain on-site and submit, if requested by the Technical Secretary, a report containing the following information:
   a. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;
   b. A description of any corrective actions taken as a part of the tune-up; and
(c) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

40 CFR §63.7500(e), §63.7540(a)(11), and Table 3 to Subpart DDDDD

Compliance Method: Compliance with this requirement shall be demonstrated by compliance with Conditions F2-3 through F2-5.

F2-3. The permittee must submit a biennial compliance report for each boiler, in accordance with §63.7550(a) and (b) and Table 9 to Subpart DDDDD, and as required in Condition E2(d). The first biennial compliance report must cover the period beginning on the compliance date specified for the boiler in §63.7495 and ending on December 31 within 2 years of the compliance date. Subsequent biennial compliance reports must cover the applicable 2-year periods from January 1 to December 31. Biennial compliance reports must be postmarked or submitted no later than January 31, and must contain the following information, as applicable:

1. Company and Facility name and address.
2. Process unit information, emissions limitations, and operating parameter limitations.
3. Date of report and beginning and ending dates of the reporting period.
4. Include the date of the most recent tune-up for each unit subject to only the requirement to conduct a biennial tune-up according to Condition F2-2. Include the date of the most recent burner inspection if it was not done biennially and was delayed until the next scheduled or unscheduled unit shutdown.
5. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

Pursuant to §63.7550(h)(3) and as required by Condition E2(d), the permittee must submit all reports required by Table 9 of Subpart DDDDD electronically to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI for Subpart DDDDD. Instead of using the electronic report in CEDRI for Subpart DDDDD, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (http://www.epa.gov/ttn/chief/cedri/index.html), once the XML schema is available. If the reporting form specific to Subpart DDDDD is not available in CEDRI at the time that the report is due, the permittee must submit the report to the EPA Administrator at the appropriate address listed in §63.13. The permittee must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI.

40 CFR §63.7550(a), (b)(1) – (4), (c)(1) and (5), (h)(3), and Table 9 to Subpart DDDDD

Compliance Method: Compliance with this requirement shall be assured by maintaining the specified records in accordance with Conditions F2-4 and F2-5.

F2-4. The permittee must keep records according to paragraphs (1) and (2) of this condition.

1. A copy of each notification and report that was submitted to comply with Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that was submitted, according to the requirements in §63.10(b)(2)(xv).
2. Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in §63.10(b)(2)(viii).

40 CFR §63.7555(a)

Compliance Method: Compliance with this requirement shall be assured by maintaining the specified records in accordance with Condition F2-5.

F2-5. The permittee must keep records in a form suitable and readily available for expeditious review, according to §63.10(b)(1). As specified in §63.10(b)(1), the permittee must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). Records can be kept off site for the remaining three years.

40 CFR §63.7560
**Compliance Method:** Compliance with this requirement is assured by maintaining all records as specified above.

**F2-6.** Table 10 to Subpart DDDDD (Attachment 4) shows which parts of the General Provisions in §§63.1 through 63.15 apply to the permittee.

40 CFR §63.7565

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**End of Permit Number 578641**
Notes:

PM = Periodic Monitoring required by 1200-03-09-.02(11)(c)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standards set forth in the permit. It is not intended to determine compliance requirements for EPA’s Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring – Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PM required.*

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing EPA Method 9. The observer must be properly certified to conduct valid evaluations.

Typical Pollutants
Particulates, VOC, CO, SO₂, NOₓ, HCl, HF, HBr, Ammonia, and Methane.

Initial observations are to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

Reader Error
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards: The TAPCD guidance is to declare non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

EPA Method 9, NSPS or NESHAPS stipulate opacity standards: EPA guidance is to allow only engineering round. No allowance for reader error is given.

*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

**Or second highest six-minute average, if the source has an exemption period stipulated in either the regulations or in the permit.

Dated June 18, 1996
Amended September 11, 2013

Decision Tree PM for Opacity for Sources Utilizing EPA Method 9*

Is Emission Unit an Equipment Leak?
Yes No

Natural Gas or No. 2 Oil-fired Combustion Source?
Yes No

Is Each Allowable Emission less than or equal to 10 TPY?
Yes No

Is Each Allowable Emission greater than 10 TPY from Colorless Pollutants (e.g. Colorless VOCs, CO, HCl, HF, Ammonia, or Methane)?
Yes No

Within one year following Title V permit issuance date conduct an initial 30-minute VEE during normal process operation

Is the highest 6-minute average** less than or equal to 50% of the applicable opacity standard (e.g. 10% opacity for a source having a 20% standard)?
Yes No

Within one year prior to Title V permit expiration date conduct another 30-minute VEE during normal process operation

Is the highest 6-minute average** greater than or equal to the applicable opacity standard & out of compliance taking both round & reader error into consideration?
Yes No

Conduct VEEs Semi-annually

Has a semi-annual VEE highest 6-minute average** been greater than or equal to the applicable opacity standard?
Yes No

Have 3 consecutive month VEEs highest 6-minute average** been less than the applicable opacity standard?

Conduct 30-minute VEEs monthly

Is the highest 6-minute average** greater than or equal to the applicable opacity standard & out of compliance taking both round & reader error into consideration?
Yes No

Report deviations from Permit requirements in periodic reports and periodic compliance certifications as required by the Major Source Operating Permit.

Dated June 18, 1996
Amended September 11, 2013
Table 1 to Subpart MMMM of Part 63 - Operating Limits if Using the Emission Rate with Add-On Controls Option

Table 2 to Subpart MMMM of Part 63 - Applicability of General Provisions to Subpart MMMM of Part 63

Table 3 to Subpart MMMM of Part 63 - Default Organic HAP Mass Fraction for Solvents and Solvent Blends

Table 4 to Subpart MMMM of Part 63 - Default Organic HAP Mass Fraction for Petroleum Solvent Groups
Table 1 to Subpart MMMM of Part 63 — Operating Limits if Using the Emission Rate with Add-On Controls Option

If you are required to comply with operating limits by §63.3892(c), you must comply with the applicable operating limits in the following table:

<table>
<thead>
<tr>
<th>For the following device…</th>
<th>You must meet the following operating limit…</th>
<th>And you must demonstrate continuous compliance with the operating limit by…</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Thermal oxidizer</td>
<td>a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to §63.3967(a)</td>
<td>i. Collecting the combustion temperature data according to §63.3968(c); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average combustion temperature at or above the temperature limit.</td>
</tr>
<tr>
<td></td>
<td>b. Ensure that the average temperature difference across the catalyst bed in any 3-hour period does not fall below the temperature difference limit established according to §63.3967(b) (2); or</td>
<td>i. Collecting the temperature data according to §63.3968(c); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average temperature difference at or above the temperature difference limit.</td>
</tr>
<tr>
<td></td>
<td>c. Develop and implement an inspection and maintenance plan according to §63.3967(b)(4) or for magnet wire coating machines according to section 3.0 of appendix A to this subpart</td>
<td>i. Maintaining and up-to-date inspection and maintenance plan, records of annual catalyst activity checks, records of monthly inspections of the oxidizer system, and records of the annual internal inspections of the catalyst bed. If a problem is discovered during a monthly or annual inspection required by §63.3967(b)(4) or for magnet wire coating machines by section 3.0 of appendix A to this subpart, you must take corrective action as soon as practicable consistent with the manufacturer’s recommendations.</td>
</tr>
<tr>
<td>2. Catalytic oxidizer</td>
<td>a. The average temperature measured just before the catalyst bed in any 3-hour period must not fall below the limit established according to §63.3967(b) (for magnet wire coating machines, temperature can be monitored before or after the catalyst bed); and either</td>
<td>i. Collecting the temperature data according to §63.3968(c); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average temperature before (or for magnet wire coating machines after) the catalyst bed at or above the temperature limit.</td>
</tr>
<tr>
<td></td>
<td>b. Ensure that the average temperature difference across the catalyst bed in any 3-hour period does not fall below the temperature difference limit established according to §63.3967(b) (2); or</td>
<td>i. Collecting the temperature data according to §63.3968(c); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average temperature difference at or above the temperature difference limit.</td>
</tr>
<tr>
<td></td>
<td>c. Develop and implement an inspection and maintenance plan according to §63.3967(b)(4) or for magnet wire coating machines according to section 3.0 of appendix A to this subpart</td>
<td>i. Maintaining and up-to-date inspection and maintenance plan, records of annual catalyst activity checks, records of monthly inspections of the oxidizer system, and records of the annual internal inspections of the catalyst bed. If a problem is discovered during a monthly or annual inspection required by §63.3967(b)(4) or for magnet wire coating machines by section 3.0 of appendix A to this subpart, you must take corrective action as soon as practicable consistent with the manufacturer’s recommendations.</td>
</tr>
<tr>
<td>3. Regenerative carbon adsorber</td>
<td>a. The total regeneration desorbing gas (e.g., steam or nitrogen) mass flow for each carbon bed regeneration cycle must not fall below the total regeneration desorbing gas mass flow limit established according to §63.3967(c); and</td>
<td>i. Measuring the total regeneration desorbing gas (e.g., steam or nitrogen) mass flow for each regeneration cycle according to §63.3968(d); and ii. Maintaining the total regeneration desorbing gas mass flow at or above the mass flow limit.</td>
</tr>
<tr>
<td></td>
<td>b. The temperature of the carbon bed, after completing each regeneration and any cooling cycle, must not exceed the carbon bed temperature limit established according to §63.3967(c)</td>
<td>i. Measuring the temperature of the carbon bed after completing each regeneration and any cooling cycle according to §63.3968(d); and ii. Operating the carbon beds such that each carbon bed is not returned to service until completing each regeneration and any cooling cycle until the recorded temperature of the carbon bed is at or below the temperature limit.</td>
</tr>
<tr>
<td>4. Condenser</td>
<td>a. The average condenser outlet (product side) gas temperature in any 3-hour period must not exceed the temperature limit established according to §63.3967(d)</td>
<td>i. Collecting the condenser outlet (product side) gas temperature according to §63.3968(e); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average gas temperature at the outlet at or below the temperature limit.</td>
</tr>
<tr>
<td>5. Concentrators, including zeolite wheels and rotary carbon adsorbers</td>
<td>a. The average gas temperature of the desorption concentrate stream in any 3-hour period must not fall below the limit established according to §63.3967(e); and</td>
<td>i. Collecting the temperature data according to 63.3968(f); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average temperature at or above the temperature limit.</td>
</tr>
</tbody>
</table>
### For the following device…

<table>
<thead>
<tr>
<th>Operating Limit…</th>
<th>And you must demonstrate continuous compliance with the operating limit by…</th>
</tr>
</thead>
</table>
| **b.** The average pressure drop of the dilute stream across the concentrator in any 3-hour period must not fall below the limit established according to §63.3967(e) | i. Collecting the pressure drop data according to 63.3968(f);  
ii. Reducing the pressure drop data to 3-hour block averages; and  
iii. Maintaining the 3-hour average pressure drop at or above the pressure drop limit. |
| **a.** The direction of the air flow at all times must be into the enclosure; and either | **a.** Collecting the direction of air flow, and either the facial velocity of air through all natural draft openings according to §63.3968(b)(1) or the pressure drop across the enclosure according to §63.3968(g)(2); and  
**ii.** Maintaining the facial velocity of air flow through all natural draft openings or the pressure drop at or above the facial velocity limit or pressure drop limit, and maintaining the direction of air flow into the enclosure at all times. |
| **b.** The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minute; or | i. See items 6.a.i and 6.a.ii. |
| **c.** The pressure drop across the enclosure must be at least 0.007 inch H₂O, as established in Method 204 of appendix M to 40 CFR part 51 | i. See items 6.a.i and 6.a.ii. |
| **a.** The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to §63.3967(f) | i. Collecting the gas volumetric flow rate or duct static pressure for each capture device according to §63.3968(g);  
ii. Reducing the data to 3-hour block averages; and  
iii. Maintaining the 3-hour average gas volumetric flow rate or duct static pressure for each capture device at or above the gas volumetric flow rate or duct static pressure limited. |
Table 2 to Subpart MMMM of Part 63—Applicability of General Provisions to Subpart MMMM of Part 63

You must comply with the applicable General Provisions requirements according to the following table:

<table>
<thead>
<tr>
<th>Citation</th>
<th>Subject</th>
<th>Applicable to Subpart MMMM</th>
<th>Explanation</th>
</tr>
</thead>
<tbody>
<tr>
<td>§63.1(a)-(14)</td>
<td>General Applicability</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.1(b)-(3)</td>
<td>Initial Applicability Determination</td>
<td>Yes</td>
<td>Applicability to subpart MMMM is also specified in §63.3881.</td>
</tr>
<tr>
<td>§63.1(c)(1)</td>
<td>Applicability After Standard Established</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.1(c)(2)-(3)</td>
<td>Applicability of Permit Program for Area Sources</td>
<td>No</td>
<td>Area sources are not subject to subpart MMMM.</td>
</tr>
<tr>
<td>§63.1(c)(4)-(5)</td>
<td>Extensions and Notifications</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.1(c)(6)</td>
<td>Reclassification</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.1(e)</td>
<td>Applicability of Permit Program Before Relevant Standard is Set</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.2</td>
<td>Definitions</td>
<td>Yes</td>
<td>Additional definitions are specified in §63.3981.</td>
</tr>
<tr>
<td>§63.1(a)-(c)</td>
<td>Units and Abbreviations</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.4(a)-(5)</td>
<td>Prohibited Activities</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.4(b)-(c)</td>
<td>Circumvention/Severability</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.5(a)</td>
<td>Construction/Reconstruction</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.5(b)-(6)</td>
<td>Requirements for Existing Newly Constructed, and Reconstructed Sources</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.5(d)</td>
<td>Application for Approval of Construction/Reconstruction</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.5(e)</td>
<td>Approval of Construction/Reconstruction</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.5(f)</td>
<td>Approval of Construction/Reconstruction Based on Prior State Review</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.6(a)</td>
<td>Compliance With Standards and Maintenance Requirements——Applicability</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.6(b)-(7)</td>
<td>Compliance Dates for New and Reconstructed Sources</td>
<td>Yes</td>
<td>Section 63.3883 specifies the compliance dates.</td>
</tr>
<tr>
<td>§63.6(c)-(5)</td>
<td>Compliance Dates for Existing Sources</td>
<td>Yes</td>
<td>Section 63.3883 specifies the compliance dates.</td>
</tr>
<tr>
<td>§63.6(e)-(1)-(2)</td>
<td>Operation and Maintenance</td>
<td>No</td>
<td>See §63.3900(b) for general duty requirement.</td>
</tr>
<tr>
<td>§63.6(f)(3)</td>
<td>SSMP</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>§63.6(f)(1)</td>
<td>Compliance Except During SSM</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>§63.6(f)(2)-(3)</td>
<td>Methods for Determining Compliance.</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.6(g)(1)-(3)</td>
<td>Use of an Alternative Standard</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.6(h)</td>
<td>Compliance With Opacity/Visible Emission Standards</td>
<td>No</td>
<td>Subpart MMMM does not establish opacity standards and does not require continuous opacity monitoring systems (COMS).</td>
</tr>
<tr>
<td>§63.6(i)(1)-(16)</td>
<td>Extension of Compliance</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.6(j)</td>
<td>Presidential Compliance Exemption</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.7(a)(1)</td>
<td>Performance Test Requirements——Applicability</td>
<td>Yes</td>
<td>Applies to all affected sources. Additional requirements for performance testing are specified in §§63.3964, 63.3965, and 63.3966.</td>
</tr>
<tr>
<td>Citation</td>
<td>Subject</td>
<td>Applicable to Subpart MMMM</td>
<td>Explanation</td>
</tr>
<tr>
<td>----------</td>
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<td>-----------------------------</td>
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</tr>
<tr>
<td>§63.7(a)(2)</td>
<td>Performance Test Requirements—Dates</td>
<td>Yes</td>
<td>Applies only to performance tests for capture system and control device efficiency at sources using these to comply with the standard. Section 63.3960 specifies the schedule for performance test requirements that are earlier than those specified in §63.7(a)(2).</td>
</tr>
<tr>
<td>§63.7(a)(3)-(4)</td>
<td>Performance Tests Required By the Administrator, Force Majeure</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.7(b)-(d)</td>
<td>Performance Test Requirements—Notification, Quality Assurance, Facilities Necessary for Safe Testing, Conditions During Test</td>
<td>Yes</td>
<td>Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standard.</td>
</tr>
<tr>
<td>§63.7(e)(1)</td>
<td>Conduct of Performance Tests</td>
<td>No</td>
<td>See §§63.3964.</td>
</tr>
<tr>
<td>§63.7(e)(2)-(4)</td>
<td>Conduct of Performance Tests</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.7(f)</td>
<td>Performance Test Requirements—Use of Alternative Test Method</td>
<td>Yes</td>
<td>Applies to all test methods except those used to determine capture system efficiency.</td>
</tr>
<tr>
<td>§63.7(g)-(h)</td>
<td>Performance Test Requirements—Data Analysis, Recordkeeping, Reporting, Waiver of Test</td>
<td>Yes</td>
<td>Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standard.</td>
</tr>
<tr>
<td>§63.8(a)(1)-(3)</td>
<td>Monitoring Requirements—Applicability</td>
<td>Yes</td>
<td>Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional requirements for monitoring are specified in §63.3968.</td>
</tr>
<tr>
<td>§63.8(a)(4)</td>
<td>Additional Monitoring Requirements</td>
<td>No</td>
<td>Subpart MMMM does not have monitoring requirements for flares.</td>
</tr>
<tr>
<td>§63.8(b)</td>
<td>Conduct of Monitoring</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.8(c)(1)</td>
<td>Continuous Monitoring System (CMS) Operation and Maintenance</td>
<td>No</td>
<td>Section 63.3968 specifies the requirements for the operation of CMS for capture systems and add-on control devices at sources using these to comply.</td>
</tr>
<tr>
<td>§63.8(c)(2)-(3)</td>
<td>CMS Operation and Maintenance</td>
<td>Yes</td>
<td>Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional requirements for CMS operations and maintenance are specified in §63.3968.</td>
</tr>
<tr>
<td>§63.8(c)(4)</td>
<td>CMS</td>
<td>No</td>
<td>§63.3968 specifies the requirements for the operation of CMS for capture systems and add-on control devices at sources using these to comply.</td>
</tr>
<tr>
<td>§63.8(c)(5)</td>
<td>COMS</td>
<td>No</td>
<td>Subpart MMMM does not have opacity or visible emission standards.</td>
</tr>
<tr>
<td>§63.8(c)(6)</td>
<td>CMS Requirements</td>
<td>No</td>
<td>Section 63.3968 specifies the requirements for monitoring systems for capture systems and add-on control devices at sources using these to comply.</td>
</tr>
<tr>
<td>§63.8(c)(7)</td>
<td>CMS Out-of-Control Periods</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.8(c)(8)</td>
<td>CMS Out-of-Control Periods and Reporting</td>
<td>No</td>
<td>§63.3920 requires reporting of CMS out-of-control periods.</td>
</tr>
<tr>
<td>§63.8(d)-(e)</td>
<td>Quality Control Program and CMS Performance Evaluation</td>
<td>No</td>
<td>Subpart MMMM does not require the use of continuous emissions monitoring systems.</td>
</tr>
<tr>
<td>§63.8(f)(1)-(5)</td>
<td>Use of an Alternative Monitoring Method</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.8(f)(6)</td>
<td>Alternative to Relative Accuracy Test</td>
<td>No</td>
<td>Subpart MMMM does not require the use of continuous emissions monitoring systems.</td>
</tr>
<tr>
<td>Citation</td>
<td>Subject</td>
<td>Applicable to Subpart MMMM</td>
<td>Explanation</td>
</tr>
<tr>
<td>----------</td>
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<td>-----------------------------</td>
<td>-------------</td>
</tr>
<tr>
<td>§63.8(g)(1)-(5)</td>
<td>Data Reduction</td>
<td>No</td>
<td>Sections 63.3967 and 63.3968 specify monitoring data reduction.</td>
</tr>
<tr>
<td>§63.9(a)-(d)</td>
<td>Notification Requirements</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.9(e)</td>
<td>Notification of Performance Test</td>
<td>Yes</td>
<td>Applies only to capture system and add-on control device performance tests at sources using these to comply with the standard.</td>
</tr>
<tr>
<td>§63.9(f)</td>
<td>Notification of Visible Emissions/Opacity Test</td>
<td>No</td>
<td>Subpart MMMM does not have opacity or visible emissions standards.</td>
</tr>
<tr>
<td>§63.9(g)(1)-(3)</td>
<td>Additional Notifications When Using CMS</td>
<td>No</td>
<td>Subpart MMMM does not require the use of continuous emissions monitoring systems.</td>
</tr>
<tr>
<td>§63.9(h)</td>
<td>Notification of Compliance Status</td>
<td>Yes</td>
<td>Section 63.3910 specifies the dates for submitting the notification of compliance status.</td>
</tr>
<tr>
<td>§63.9(i)</td>
<td>Adjustment of Submittal Deadlines</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.9(j)</td>
<td>Change in Previous Information</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.9(k)</td>
<td>Electronic reporting procedures</td>
<td>Yes</td>
<td>Only as specified in §63.9(j).</td>
</tr>
<tr>
<td>§63.10(a)</td>
<td>Recordkeeping/Reporting—Applicability and General Information</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.10(b)(1)</td>
<td>General Recordkeeping Requirements</td>
<td>Yes</td>
<td>Additional requirements are specified in §§63.3930 and 63.3931.</td>
</tr>
<tr>
<td>§63.10(b)(2)(i)-(ii)</td>
<td>Recordkeeping of Occurrence and Duration of Startups and Shutdowns and of Failures to Meet Standards</td>
<td>No</td>
<td>See §63.3930(j).</td>
</tr>
<tr>
<td>§63.10(b)(2)(iii)</td>
<td>Recordkeeping Relevant to Maintenance of Air Pollution Control and Monitoring Equipment</td>
<td>Yes</td>
<td>§63.10(b)(2)(iii).</td>
</tr>
<tr>
<td>§63.10(b)(2)(iv)-(v)</td>
<td>Actions Taken to Minimize Emissions During SSM</td>
<td>No</td>
<td>See §63.3930(j) for a record of actions taken to minimize emissions duration a deviation from the standard.</td>
</tr>
<tr>
<td>§63.10(b)(2)(vi)</td>
<td>Recordkeeping for CMS Malfunctions</td>
<td>No</td>
<td>See §63.3930(j) for records of periods of deviation from the standard, including instances where a CMS is inoperative or out-of-control.</td>
</tr>
<tr>
<td>§63.10(b)(2)(xii)</td>
<td>Records</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.10(b)(2)(xiii)</td>
<td>No</td>
<td>Subpart MMMM does not require the use of continuous emissions monitoring systems.</td>
<td></td>
</tr>
<tr>
<td>§63.10(b)(2)(xiv)</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>§63.10(b)(3)</td>
<td>Recordkeeping Requirements for Applicability Determinations</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.10(c)(1)-(6)</td>
<td>Additional Recordkeeping Requirements for Sources with CMS</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.10(c)(7)-(8)</td>
<td>Additional Recordkeeping Requirements for Sources with CMS</td>
<td>No</td>
<td>See §63.3930(j) for records of periods of deviation from the standard, including instances where a CMS is inoperative or out-of-control.</td>
</tr>
<tr>
<td>§63.10(c)(10)-(14)</td>
<td>Additional Recordkeeping Requirements for Sources with CMS</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.10(c)(15)</td>
<td>Records Regarding the SSMP</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>§63.10(d)(1)</td>
<td>General Reporting Requirements</td>
<td>Yes</td>
<td>Additional requirements are specified in §63.3920.</td>
</tr>
<tr>
<td>§63.10(d)(2)</td>
<td>Report of Performance Test Results</td>
<td>Yes</td>
<td>Additional requirements are specified in §63.3920(b) and (d).</td>
</tr>
<tr>
<td>Citation</td>
<td>Subject</td>
<td>Applicable to Subpart MMMM</td>
<td>Explanation</td>
</tr>
<tr>
<td>------------------</td>
<td>---------------------------------------------------</td>
<td>----------------------------</td>
<td>-----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>§63.10(d)(3)</td>
<td>Reporting Opacity or Visible Emissions Observations</td>
<td>No</td>
<td>Subpart MMMM does not require opacity or visible emissions observations.</td>
</tr>
<tr>
<td>§63.10(d)(4)</td>
<td>Progress Reports for Sources With Compliance Extensions</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.10(d)(5)</td>
<td>SSM Reports</td>
<td>No</td>
<td>See §63.3920 (a)(7) and (c).</td>
</tr>
<tr>
<td>§63.10(e)(1)-(2)</td>
<td>Additional CMS Reports</td>
<td>No</td>
<td>Subpart MMMM does not require the use of continuous emissions monitoring systems.</td>
</tr>
<tr>
<td>§63.10(e)(3)</td>
<td>Excess Emissions/CMS Performance Reports</td>
<td>No</td>
<td>Section 63.3920(b) specifies the contents of periodic compliance reports.</td>
</tr>
<tr>
<td>§63.10(e)(4)</td>
<td>COMS Data Reports</td>
<td>No</td>
<td>Subpart MMMM does not specify requirements for opacity or COMS.</td>
</tr>
<tr>
<td>§63.10(f)</td>
<td>Recordkeeping/Reporting Waiver</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.11</td>
<td>Control Device Requirements/Flares</td>
<td>No</td>
<td>Subpart MMMM does not specify use of flares for compliance.</td>
</tr>
<tr>
<td>§63.12</td>
<td>State Authority and Delegations</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.13</td>
<td>Addresses</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.14</td>
<td>IBR</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§63.15</td>
<td>Availability of Information/Confidentiality</td>
<td>Yes</td>
<td></td>
</tr>
</tbody>
</table>
Table 3 to Subpart MMMM of Part 63 - Default Organic HAP Mass Fraction for Solvents and Solvent Blends

The permittee may use the mass fraction values in the following table for solvent blends for which the permittee does not have test data or manufacturer's formulation data and which match either the solvent blend name or the chemical abstract series (CAS) number. If a solvent blend matches both the name and CAS number for an entry, that entry's organic HAP mass fraction must be used for that solvent blend. Otherwise, use the organic HAP mass fraction for the entry matching either the solvent blend name or CAS number, or use the organic HAP mass fraction from Table 4 to Subpart MMMM if neither the name or CAS number match.

<table>
<thead>
<tr>
<th>Solvent/solvent blend</th>
<th>CAS. No.</th>
<th>Average organic HAP mass fraction</th>
<th>Typical organic HAP, percent by mass</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Toluene</td>
<td>108-88-3</td>
<td>1.0</td>
<td>Toluene</td>
</tr>
<tr>
<td>2. Xylene(s)</td>
<td>1330-20-7</td>
<td>0.5</td>
<td>Xylene, ethylbenzene</td>
</tr>
<tr>
<td>3. Hexane</td>
<td>110-54-3</td>
<td>1.0</td>
<td>n-hexane</td>
</tr>
<tr>
<td>4. n-Hexane</td>
<td>110-54-3</td>
<td>0.5</td>
<td>n-hexane</td>
</tr>
<tr>
<td>5. Ethylbenzene</td>
<td>100-41-4</td>
<td>1.0</td>
<td>Ethylbenzene</td>
</tr>
<tr>
<td>6. Aliphatic 140</td>
<td></td>
<td>0</td>
<td>None</td>
</tr>
<tr>
<td>7. Aromatic 100</td>
<td></td>
<td>0.02</td>
<td>1% xylene, 1% cumene</td>
</tr>
<tr>
<td>8. Aromatic 150</td>
<td></td>
<td>0.09</td>
<td>Naphthalene</td>
</tr>
<tr>
<td>9. Aromatic naphtha</td>
<td>64742-95-6</td>
<td>0.02</td>
<td>1% xylene, 1% cumene</td>
</tr>
<tr>
<td>10. Aromatic solvent</td>
<td>64742-94-5</td>
<td>0.1</td>
<td>Naphthalene</td>
</tr>
<tr>
<td>11. Exempt mineral spirits</td>
<td>8032-32-4</td>
<td>0</td>
<td>None</td>
</tr>
<tr>
<td>12. Lignolines (VM &amp; P)</td>
<td>8032-32-4</td>
<td>0</td>
<td>None</td>
</tr>
<tr>
<td>13. Lactol spirits</td>
<td>64742-89-6</td>
<td>0.15</td>
<td>Toluene</td>
</tr>
<tr>
<td>14. Low aromatic white spirit</td>
<td>64742-82-1</td>
<td>0</td>
<td>None</td>
</tr>
<tr>
<td>15. Mineral spirits</td>
<td>64742-88-7</td>
<td>0.01</td>
<td>Xylenes</td>
</tr>
<tr>
<td>16. Hydrotreated naphtha</td>
<td>64742-48-9</td>
<td>0</td>
<td>None</td>
</tr>
<tr>
<td>17. Hydrotreated light distillate</td>
<td>64742-47-8</td>
<td>0.001</td>
<td>Toluene</td>
</tr>
<tr>
<td>18. Stoddard solvent</td>
<td>8052-41-3</td>
<td>0.01</td>
<td>Xylenes</td>
</tr>
<tr>
<td>19. Super high-flash naphtha</td>
<td>64742-95-6</td>
<td>0.05</td>
<td>Xylenes</td>
</tr>
<tr>
<td>20. Varso® solvent</td>
<td>8052-49-3</td>
<td>0.01</td>
<td>0.5% xylenes, 0.5% ethylbenzene</td>
</tr>
<tr>
<td>21. VM &amp; P naphtha</td>
<td>64742-89-8</td>
<td>0.06</td>
<td>3% toluene, 3% xylene</td>
</tr>
<tr>
<td>22. Petroleum distillate mixture</td>
<td>68477-31-6</td>
<td>0.08</td>
<td>4% naphthalene, 4% biphenyl</td>
</tr>
</tbody>
</table>
Table 4 to Subpart MMMM of Part 63 - Default Organic HAP Mass Fraction for Petroleum Solvent Groups

The permittee may use the mass fraction values in the following table for solvent blends for which the permittee does not have test data or manufacturer's formulation data.

<table>
<thead>
<tr>
<th>Solvent Type</th>
<th>Average Organic HAP Mass Fraction</th>
<th>Typical Organic HAP Percent by Mass</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aliphatic⁰</td>
<td>0.03</td>
<td>1% xylene, 1% toluene, and 1% ethylbenzene</td>
</tr>
<tr>
<td>Aromatic⁰</td>
<td>0.06</td>
<td>4% xylene, 1% toluene, and 1% ethylbenzene</td>
</tr>
</tbody>
</table>

⁰ Use this table only if the solvent blend does not match any of the solvent blends in Table 3 of Attachment 4 by either solvent blend name or CAS number and you only know whether the blend is aliphatic or aromatic.


ATTACHMENT 3

Appendix A to Subpart MMMM of Part 63 — Alternative Capture Efficiency and Destruction Efficiency Measurement and Monitoring Procedures for Magnet Wire Coating Operations
Appendix A to Subpart MMMM of Part 63 — Alternative Capture Efficiency and Destruction Efficiency Measurement and Monitoring Procedures for Magnet Wire Coating Operations

1.0 Introduction.

1.1 These alternative procedures for capture efficiency and destruction efficiency measurement and monitoring are intended principally for newer magnet wire coating machines where the control device is internal and integral to the oven so that it is difficult or infeasible to make gas measurements at the inlet to the control device.

1.2 In newer gas fired magnet wire ovens with thermal control (no catalyst), the burner tube serves as the control device (thermal oxidizer) for the process. The combustion of solvents in the burner tube is the principal source of heat for the oven.

1.3 In newer magnet wire ovens with a catalyst there is either a burner tube (gas fired ovens) or a tube filled with electric heating elements (electric heated oven) before the catalyst. A large portion of the solvent is often oxidized before reaching the catalyst. The combustion of solvents in the tube and across the catalyst is the principal source of heat for the oven. The internal catalyst in these ovens cannot be accessed without disassembly of the oven. This disassembly includes removal of the oven insulation. Oven reassembly often requires the installation of new oven insulation.

1.4 Some older magnet wire ovens have external afterburners. A significant portion of the solvent is oxidized within these ovens as well.

1.5 The alternative procedure for destruction efficiency determines the organic carbon content of the volatiles entering the control device based on the quantity of coating used, the carbon content of the volatile portion of the coating and the efficiency of the capture system. The organic carbon content of the control device outlet (oven exhaust for ovens without an external afterburner) is determined using Method 25 or 25A.

1.6 When it is difficult or infeasible to make gas measurements at the inlet to the control device, measuring capture efficiency with a gas-to-gas protocol (see §63.3965(d)) which relies on direct measurement of the captured gas stream will also be difficult or infeasible. In these situations, capture efficiency measurement is more appropriately done with a procedure which does not rely on direct measurement of the captured gas stream.

1.7 Magnet wire ovens are relatively small compared to many other coating ovens. The exhaust rate from an oven is low and varies as the coating use rate and solvent loading rate change from job to job. The air balance in magnet wire ovens is critical to product quality. Magnet wire ovens must be operated under negative pressure to avoid smoke and odor in the workplace, and the exhaust rate must be sufficient to prevent over heating within the oven.

1.8 The liquid and gas measurements needed to determine capture efficiency and control device efficiency using these alternative procedures may be made simultaneously.

1.9 Magnet wire facilities may have many (e.g., 20 to 70 or more) individual coating lines each with its own capture and control system. With approval, representative capture efficiency and control device efficiency testing of one magnet wire coating machine out of a group of identical or very similar magnet wire coating machines may be performed rather than testing every individual magnet wire coating machine. The operating parameters must be established for each tested magnet wire coating machine during each capture efficiency test and each control device efficiency test. The operating parameters established for each tested magnet wire coating machine also serve as the operating parameters for untested or very similar magnet wire coating machines represented by a tested magnet wire coating machine.

2.0 Capture Efficiency.

2.1 If the capture system is a permanent total enclosure as described in §63.3965(a), then its capture efficiency may be assumed to be 100 percent.

2.2 If the capture system is not a permanent total enclosure, then capture efficiency must be determined using the liquid-to-uncaptured-gas protocol using a temporary total enclosure or building enclosure in §63.3965(c), or an alternative capture efficiency protocol (see §63.3965(e)) which does not rely on direct measurement of the captured gas stream.

2.3 As an alternative to establishing and monitoring the capture efficiency operating parameters in §63.3967(f), the monitoring described in either section 2.4 or 2.5, and the monitoring described in sections 2.6 and 2.7 may be used for magnet wire coating machines.
2.4 Each magnet wire oven must be equipped with an interlock mechanism which will stop or prohibit the application of coating either when any exhaust fan for that oven is not operating or when the oven experiences an over limit temperature condition.

2.5 Each magnet wire oven must be equipped with an alarm which will be activated either when any oven exhaust fan is not operating or when the oven experiences an over limit temperature condition.

2.6 If the interlock in 2.4 or the alarm in 2.5 is monitoring for over limit temperature conditions, then the temperature(s) that will trigger the interlock or the alarm must be included in the start-up, shutdown and malfunction plan and the interlock or alarm must be set to be activated when the oven reaches that temperature.

2.7 Once every 6 months, each magnet wire oven must be checked using a smoke stick or equivalent approach to confirm that the oven is operating at negative pressure compared to the surrounding atmosphere.

3.0 Control Device Efficiency.

3.1 Determine the weight fraction carbon content of the volatile portion of each coating, thinner, additive, or cleaning material used during each test run using either the procedure in section 3.2 or 3.3.

3.2 Following the procedures in Method 204F, distill a sample of each coating, thinner, additive, or cleaning material used during each test run to separate the volatile portion. Determine the weight fraction carbon content of each distillate using ASTM Method D5291-02, “Standard Test Methods for Instrumental Determination of Carbon, Hydrogen, and Nitrogen in Petroleum Products and Lubricants” (incorporated by reference, see §63.14).

3.3 Analyze each coating, thinner, additive or cleaning material used during each test run using Method 311. For each volatile compound detected in the gas chromatographic analysis of each coating, thinner, additive, or cleaning material calculate the weight fraction of that whole compound in the coating, thinner, additive, or cleaning material. For each volatile compound detected in the gas chromatographic analysis of each coating, thinner, additive, or cleaning material calculate the weight fraction of the carbon in that compound in the coating, thinner, additive, or cleaning material. Calculate the weight fraction carbon content of each coating, thinner, additive, or cleaning material as the ratio of the sum of the carbon weight fractions divided by the sum of the whole compound weight fractions.

3.4 Determine the mass fraction of total volatile hydrocarbon (TVH) in each coating, thinner, additive, or cleaning material, i, used during each test run using Method 24. The mass fraction of total volatile hydrocarbon equals the weight fraction volatile matter (Wv in Method 24) minus the weight fraction water (Ww in Method 24), if any, present in the coating. The ASTM Method D6053-00, “Standard Test Method for Determination of Volatile Organic Compound (VOC) Content of Electrical Insulating Varnishes” (incorporated by reference, see §63.14), may be used as an alternative to Method 24 for magnet wire enamels. The specimen size for testing magnet wire enamels with ASTM Method D6053-00 must be 2.0 ±0.1 grams.

3.5 Determine the volume (VOLi) or mass (MASSI) of each coating, thinner, additive, or cleaning material, i, used during each test run.

3.6 Calculate the total volatile hydrocarbon input (TVHC_{inlet}) to the control device during each test run, as carbon, using Equation 1:

\[ TVHC_{inlet} = \sum_{i=1}^{n} (TVH_i \times VOL_i \times D_i \times CD_i) \quad (Eq. \ 1) \]

where:

- TVH = Mass fraction of TVH in coating, thinner, additive, or cleaning material, i, used in the coating operation during the test run.
- VOL = Volume of coating, thinner, additive, or cleaning material, i, used in the coating operation during the test run, liters.
- D = Density of coating, thinner, additive, or cleaning material, i, used in the coating operation during the test run, kg per liter.
- CD = Weight fraction carbon content of the distillate from coating, thinner, additive, or cleaning material, i, used in the coating operation during the test run, percent.
- n = Number of coating, thinner, additive, and cleaning materials used in the coating operation during the test run.

3.7 If the mass, MASSi, of each coating, solvent, additive, or cleaning material, i, used during the test run is measured directly then MASSi can be substituted for VOLi × Di in Equation 1 in section 3.6.

3.8 Determine the TVHC output (TVHC_{outlet}) from the control device, as carbon, during each test run using the methods in §63.3966(a) and the procedure for determining Mfo in §63.3966(d). TVHC_{outlet} equals Mfo times the length of the test run in hours.
3.9 Determine the control device efficiency (DRE) for each test run using Equation 2:

\[
DRE = \left( \frac{TVHC_{\text{inlet}} - TVHC_{\text{outlet}}}{TVHC_{\text{inlet}}} \right) \times 100 \quad (\text{Eq. 2})
\]

3.10 The efficiency of the control device is the average of the three individual test run values determined in section 3.9.

3.11 As an alternative to establishing and monitoring the destruction efficiency operating parameters for catalytic oxidizers in §63.3967(b), the monitoring described in sections 3.12 and 3.13 may be used for magnet wire coating machines equipped with catalytic oxidizers.

3.12 During the performance test, you must monitor and record the temperature either just before or just after the catalyst bed at least once every 15 minutes during each of the three test runs. Use the data collected during the performance test to calculate and record the average temperature either just before or just after the catalyst bed during the performance test. This is the minimum operating limit for your catalytic oxidizer and for the catalytic oxidizers in identical or very similar magnet wire coating machines represented by the tested magnet wire coating machine.

3.13 You must develop and implement an inspection and maintenance plan for your catalytic oxidizer(s). The plan must address, at a minimum, the elements specified in sections 3.14 and 3.15, and the elements specified in either (a) section 3.16 or (b) sections 3.17 and 3.18.

3.14 You must conduct a monthly external inspection of each catalytic oxidizer system, including the burner assembly and fuel supply lines for problems and, as necessary, adjust the equipment to assure proper air-to-fuel mixtures.

3.15 You must conduct an annual internal inspection of each accessible catalyst bed to check for channeling, abrasion, and settling. If problems are found, you must replace the catalyst bed or take corrective action consistent with the manufacturer's recommendations. This provision does not apply to internal catalysts which cannot be accessed without disassembling the magnet wire oven.

3.16 You must take a sample of each catalyst bed and perform an analysis of the catalyst activity (i.e., conversion efficiency) following the manufacturer's or catalyst supplier's recommended procedures. This sampling and analysis must be done within the time period shown in Table 1 below of the most recent of the last catalyst activity test or the last catalyst replacement. For example, if the warranty for the catalyst is 3 years and the catalyst was more recently replaced then the sampling and analysis must be done within the earlier of 26,280 operating hours or 5 calendar years of the last catalyst replacement. If the warranty for the catalyst is 3 years and the catalyst was more recently tested then the sampling and analysis must be done within the earlier of 13,140 operating hours or 3 calendar years of the last catalyst activity test. If problems are found during the catalyst activity test, you must replace the catalyst bed or take corrective action consistent with the manufacturer's recommendations.

Table 1—Catalyst Monitoring Requirements

<table>
<thead>
<tr>
<th>If the catalyst was last (more recently) replaced and the warranty period is . . .</th>
<th>Then the time between catalyst replacement and the next catalyst activity test cannot exceed the earlier of . . .</th>
<th>And the catalyst was more recently tested, then the time between catalyst activity tests cannot exceed the earlier of . . .</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 year</td>
<td>8,760 operating hours or 5 calendar years</td>
<td>8,760 operating hours or 3 calendar years.</td>
</tr>
<tr>
<td>2 years</td>
<td>15,520 operating hours or 5 calendar years</td>
<td>8,760 operating hours or 3 calendar years.</td>
</tr>
<tr>
<td>3 years</td>
<td>26,280 operating hours or 5 calendar years</td>
<td>13,100 operating hours or 3 calendar years.</td>
</tr>
<tr>
<td>4 years</td>
<td>35,040 operating hours or 5 calendar years</td>
<td>17,520 operating hours or 3 calendar years.</td>
</tr>
<tr>
<td>5 or more years</td>
<td>43,800 operating hours or 5 calendar years</td>
<td>21,900 operating hours or 3 calendar years.</td>
</tr>
</tbody>
</table>

3.17 During the performance test, you must determine the average concentration of organic compounds as carbon in the magnet wire oven exhaust stack gases (C_c in Equation 1 in §63.3966(d)) and the destruction efficiency of the catalytic oxidizer, and calculate the operating limit for oven exhaust stack gas concentration as follows. You must identify the highest organic HAP content coating used on this magnet wire coating machine or any identical or very similar magnet wire coating machines to which the same destruction efficiency test results will be applied. Calculate the percent emission reduction necessary to meet the magnet wire coating emission limit when using this coating. Calculate the average concentration of organic compounds as carbon in the magnet wire oven exhaust stack gases that would be equivalent to exactly meeting the magnet wire coating emissions limit when using the highest organic HAP content coating. The maximum operating limit for oven exhaust stack gas concentration equals 90 percent of this calculated concentration.
3.18 For each magnet wire coating machine equipped with a catalytic oxidizer you must perform an annual 10 minute test of the oven exhaust stack gases using EPA Method 25A. This test must be performed under steady state operating conditions similar to those at which the last destruction efficiency test for equipment of that type (either the specific magnet wire coating machine or an identical or very similar magnet wire coating machine) was conducted. If the average exhaust stack gas concentration during the annual test of a magnet wire coating machine equipped with a catalytic oxidizer is greater than the operating limit established in section 3.17 then that is a deviation from the operating limit for that catalytic oxidizer. If problems are found during the annual 10-minute test of the oven exhaust stack gases, you must replace the catalyst bed or take other corrective action consistent with the manufacturer’s recommendations.

3.19 If a catalyst bed is replaced and the replacement catalyst is not of like or better kind and quality as the old catalyst, then you must conduct a new performance test to determine destruction efficiency according to §63.3966 and establish new operating limits for that catalytic oxidizer unless destruction efficiency test results and operating limits for an identical or very similar unit (including consideration of the replacement catalyst) are available and approved for use for the catalytic oxidizer with the replacement catalyst.

3.20 If a catalyst bed is replaced and the replacement catalyst is of like or better kind and quality as the old catalyst, then a new performance test to determine destruction efficiency is not required and you may continue to use the previously established operating limits for that catalytic oxidizer.
# ATTACHMENT 4

Table 10 to Subpart DDDDD of Part 63 - Applicability of General Provisions to Subpart DDDDD
<table>
<thead>
<tr>
<th>Citation</th>
<th>Subject</th>
<th>Applies to subpart DDDDD</th>
</tr>
</thead>
<tbody>
<tr>
<td>§63.1</td>
<td>Applicability</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.2</td>
<td>Definitions</td>
<td>Yes. Additional terms defined in §63.7575</td>
</tr>
<tr>
<td>§63.3</td>
<td>Units and Abbreviations</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.4</td>
<td>Prohibited Activities and Circumvention</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.5</td>
<td>Preconstruction Review and Notification Requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.6(a), (b)(1)-(b)(5), (b)(7), (c)</td>
<td>Compliance with Standards and Maintenance Requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.6(e)(1)(i)</td>
<td>General duty to minimize emissions.</td>
<td>No. See §63.7500(a)(3) for the general duty requirement.</td>
</tr>
<tr>
<td>§63.6(e)(1)(ii)</td>
<td>Requirement to correct malfunctions as soon as practicable.</td>
<td>No.</td>
</tr>
<tr>
<td>§63.6(e)(3)</td>
<td>Startup, shutdown, and malfunction plan requirements.</td>
<td>No.</td>
</tr>
<tr>
<td>§63.6(f)(1)</td>
<td>Startup, shutdown, and malfunction exemptions for compliance with non-opacity emission standards.</td>
<td>No.</td>
</tr>
<tr>
<td>§63.6(f)(2) and (3)</td>
<td>Compliance with non-opacity emission standards.</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.6(g)</td>
<td>Use of alternative standards</td>
<td>Yes, except §63.7555(d)(13) specifies the procedure for application and approval of an alternative timeframe with the PM controls requirement in the startup work practice (2).</td>
</tr>
<tr>
<td>§63.6(h)(1)</td>
<td>Startup, shutdown, and malfunction exemptions to opacity standards.</td>
<td>No. See §63.7500(a).</td>
</tr>
<tr>
<td>§63.6(h)(2) to (h)(9)</td>
<td>Determining compliance with opacity emission standards</td>
<td>No. Subpart DDDDD specifies opacity as an operating limit not an emission standard.</td>
</tr>
<tr>
<td>§63.6(i)</td>
<td>Extension of compliance</td>
<td>Yes. Note: Facilities may also request extensions of compliance for the installation of combined heat and power, waste heat recovery, or gas pipeline or fuel feeding infrastructure as a means of complying with this subpart.</td>
</tr>
<tr>
<td>§63.6(j)</td>
<td>Presidential exemption.</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.7(a), (b), (c), and (d)</td>
<td>Performance Testing Requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.7(e)(1)</td>
<td>Conditions for conducting performance tests</td>
<td>No. Subpart DDDDD specifies conditions for conducting performance tests at §63.7520(a) to (c).</td>
</tr>
<tr>
<td>§63.7(e)(2)-(e)(9), (f), (g), and (h)</td>
<td>Performance Testing Requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.8(a) and (b)</td>
<td>Applicability and Conduct of Monitoring</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.8(c)(1)</td>
<td>Operation and maintenance of CMS</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.8(c)(1)(i)</td>
<td>General duty to minimize emissions and CMS operation</td>
<td>No. See §63.7500(a)(3).</td>
</tr>
<tr>
<td>§63.8(c)(1)(ii)</td>
<td>Operation and maintenance of CMS</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.8(c)(1)(iii)</td>
<td>Startup, shutdown, and malfunction plans for CMS</td>
<td>No.</td>
</tr>
<tr>
<td>§63.8(c)(2) to (c)(9)</td>
<td>Operation and maintenance of CMS</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.8(d)(1) and (2)</td>
<td>Monitoring Requirements, Quality Control Program</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.8(d)(3)</td>
<td>Written procedures for CMS</td>
<td>Yes, except for the last sentence, which refers to a startup, shutdown, and</td>
</tr>
<tr>
<td>Citation</td>
<td>Subject</td>
<td>Applies to subpart DDDDD</td>
</tr>
<tr>
<td>---------------</td>
<td>---------------------------------------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>§63.8(e)</td>
<td>Performance evaluation of a CMS</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.8(f)</td>
<td>Use of an alternative monitoring method.</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.8(g)</td>
<td>Reduction of monitoring data</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.9</td>
<td>Notification Requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(a), (b)(1)</td>
<td>Recordkeeping and Reporting Requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(b)(2)(i)</td>
<td>Recordkeeping of occurrence and duration of startups or shutdowns</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(b)(2)(ii)</td>
<td>Recordkeeping of malfunctions</td>
<td>No. See §63.7555(d)(7) for recordkeeping of occurrence and duration and §63.7555(d)(8) for actions taken during malfunctions.</td>
</tr>
<tr>
<td>§63.10(b)(2)(iii)</td>
<td>Maintenance records</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(b)(2)(iv) and (v)</td>
<td>Actions taken to minimize emissions during startup, shutdown, or malfunction</td>
<td>No.</td>
</tr>
<tr>
<td>§63.10(b)(2)(vi)</td>
<td>Recordkeeping for CMS malfunctions</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(b)(2)(vii) to (xiv)</td>
<td>Other CMS requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(b)(3)</td>
<td>Recordkeeping requirements for applicability determinations</td>
<td>No.</td>
</tr>
<tr>
<td>§63.10(c)(1) to (9)</td>
<td>Recordkeeping for sources with CMS</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(c)(10) and (11)</td>
<td>Recording nature and cause of malfunctions, and corrective actions</td>
<td>No. See §63.7555(d)(7) for recordkeeping of occurrence and duration and §63.7555(d)(8) for actions taken during malfunctions.</td>
</tr>
<tr>
<td>§63.10(c)(12) and (13)</td>
<td>Recordkeeping for sources with CMS</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(d)(1) and (2)</td>
<td>General reporting requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(d)(3)</td>
<td>Reporting opacity or visible emission observation results</td>
<td>No.</td>
</tr>
<tr>
<td>§63.10(d)(4)</td>
<td>Progress reports under an extension of compliance</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(d)(5)</td>
<td>Startup, shutdown, and malfunction reports</td>
<td>No. See §63.7550(c)(11) for malfunction reporting requirements.</td>
</tr>
<tr>
<td>§63.10(e)</td>
<td>Additional reporting requirements for sources with CMS</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(f)</td>
<td>Waiver of recordkeeping or reporting requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.11</td>
<td>Control Device Requirements</td>
<td>No.</td>
</tr>
<tr>
<td>§63.12</td>
<td>State Authority and Delegation</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.13-63.16</td>
<td>Addresses, Incorporation by Reference, Availability of Information, Performance Track Provisions</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.1(a)(5),(a)(7)-(a)(9), (b)(2), (c)(3)-(4), (d), 63.6(b)(6), (c)(3), (c)(4), (d), (e)(2), (e)(3)(ii), (h)(3), (h)(5)(iv), 63.8(a)(3), 63.9(b)(3), (h)(4), 63.10(c)(2)-(4), (c)(9).</td>
<td>Reserved</td>
<td></td>
</tr>
</tbody>
</table>
ATTACHMENT 5

AGREEMENT LETTERS
currently in our confidential file. Understanding that Title V permits need to have compliance requirements that are in the permit and that are not confidential, we are proposing a modification only to the manner in which the material usage limitations are conveyed. The current limitations are confidential because they would present a manufacturing advantage to our competitors if they knew our input rates and capacities.

- Propose an average daily maximum VOC emission cap based on the confidential materials usage. This would be reported as TPD and would be based on materials usage for a calendar month. This would allow us to demonstrate compliance without compromising confidential data.

In addition, the ovens use only natural gas and propane on an emergency basis. They cannot use fuel oil.

- We request a voluntary cap on SO₂ of 0.1 Lb/Hr rate (.438 TPY), on sources 94-0072-05, 06 & 16.

Thank you for your consideration. Should you have any questions on this matter please contact me at (615) 794-8451.

Sincerely,

James W. O’Connor
Plant Manager
Essex Group, Inc.
120 Southeast Parkway
Franklin, TN 37064

Ref. No. 94-0072

Proposed limits:

Nitrogen oxides (NOx) emissions from this entire facility shall not exceed 99.0 tons over all consecutive 12-month periods. Actual emissions shall be calculated on a monthly basis using emission factors for natural gas combustion, combustion of any nitrogen-containing solvent, and shall include any emissions from insignificant sources.

On behalf of Essex Group, Inc., I agree to the above limits.

Signature ____________________________

Name (type or print) David L. Horchle

Title Executive Director of Operations

Date 2/5/15
submitted electronically to Air.Pollution.Control@tn.gov

March 3, 2016

Ms. Michelle Walker Owenby
Technical Secretary
Tennessee Division of Air Pollution Control
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor
Nashville, TN 37243

RE: Emission Limit Agreement - Draft Title V Permit Conditions E9-3
Essex Group, Inc., Franklin, Tennessee
Source Number: 94-0072

Dear Ms. Owenby:

Essex Group, Inc. (Essex) owns and operates a magnet wire manufacturing facility located in Franklin, Tennessee and currently holds Title V Operating Permit No. 556509. Essex submitted a Title V Operating Permit renewal application on July 8, 2014. The application included proposed allowable emission limitations, lower than TNAPCR 1200-03-06-02(2). Essex formally agrees to the following emission limits:

1. Particulate matter emitted from the Two (2) Kewanee Natural Gas-Fired Boilers at 6.75 MMBtu/hr heat input each (Source ID: 94-0072-22) will be limited to 0.2 lb/hr from both boilers combined (0.1 lb/hr per boiler).

   Compliance will be assured by use of natural gas only as fuel and USEPA’s AP-42 1.4-1 emission factor of 7.6 lb/MMscf, converted to lb/MMBtu using a high heating value of 1,020 MMBtu/MMscf.

Any technical questions regarding this agreement letter should be directed to Joanne Rose at 615-790-4512.

I have reviewed this information and to the best of my knowledge, and based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete.

Sincerely,

[Signature]

David A. Elliott
Plant Manager

Cc: Greg Forte, TDEC
    Robert Distler, Essex
    Joanne Rose, Essex
    Jeff Twaddle, ERM
    Lauren Asher, ERM
June 18, 2019

Via email Air.Pollution.Control@tn.gov

Michelle Walker Owenby  
Technical Secretary  
Division of Air Pollution Control  
Attn: Operating Permits Program  
William R. Snodgrass TT – 15th Floor  
312 Rosa L. Parks Avenue  
Nashville, Tennessee 37243-1531

RE: Volatile Organic Compounds Limitation  
Essex Group, Inc.  
120 Southeast Parkway  
Franklin, TN 37064  
Facility ID 94-0072

Dear Ms. Owenby:

In 2008, during modifications to the facility, Essex Group, Inc. (Essex) agreed to a VOC limitation in order to avoid Prevention of Significant Deterioration (PSD). The original 2008 signed agreement has been misplaced, so Essex hereby restates and agrees to the following emission limitation: Volatile Organic Compounds emitted from the entire facility shall not exceed 235.0 tons during any consecutive twelve month period.

I certify that, based on information and belief formed after a reasonable inquiry, the statements and information contained in this document are true, accurate, and complete, to the best of my knowledge.

On behalf of Essex Group, Inc. I voluntarily agree to the above proposed limit.

Sincerely,

[Signature]

William J. Murton  
Plant Manager
## TITLE V FEE SELECTION

Type or print and submit to the email address above.

### FACILITY INFORMATION

1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)]

2. Site name (if different from legal name)

3. Site address (St./Rd./Hwy.)

4. Emission source reference number

5. Title V permit number

### FEE SELECTION

This fee selection is effective beginning January 1, __________. When approved, this selection will be effective until a new Fee Selection form is submitted. Fee Selection forms must be submitted on or before December 31 of the annual accounting period.

### 6. Payment Schedule (choose one):

- Calendar Year Basis (January 1 – December 31) □
- Fiscal Year Basis (July 1 – June 30) □

### 7. Payment Basis (choose one):

- Actual Emissions Basis □
- Allowable Emissions Basis □
- Combination of Actual and Allowable Emissions Basis □

### 8. If Payment Basis is “Actual Emissions” or “Combination of Actual and Allowable Emissions”, complete the following table for each permitted source and each pollutant for which fees are due for that source. See instructions for further details.

<table>
<thead>
<tr>
<th>Source ID</th>
<th>Pollutant</th>
<th>Allowable or Actual Emissions</th>
<th>If allowable emissions: Specify condition number and limit.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>If actual emissions: Describe calculation method and provide example. Provide condition number that specifies method, if applicable.</td>
</tr>
</tbody>
</table>

CN-1583 (Rev. 4-19)
### APC 36

**8. (Continued)**

<table>
<thead>
<tr>
<th>Source ID</th>
<th>Pollutant</th>
<th>Allowable or Actual Emissions</th>
<th>If allowable emissions: Specify condition number and limit. If actual emissions: Describe calculation method and provide example. Provide condition number that specifies method, if applicable.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

### CONTACT INFORMATION (BILLING)

<table>
<thead>
<tr>
<th>9. Billing contact</th>
<th>Phone number with area code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mailing address</td>
<td>Fax number with area code</td>
</tr>
<tr>
<td>City</td>
<td>State Zip code Email address</td>
</tr>
</tbody>
</table>

### SIGNATURE BY RESPONSIBLE OFFICIAL

Based upon information and belief formed after reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in the submittal is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

<table>
<thead>
<tr>
<th>10. Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signer’s name (type or print)</td>
<td>Title</td>
</tr>
</tbody>
</table>
TITLE V PERMIT STATEMENT

Facility Name: Essex Furukawa Magnet Wire USA, LLC
City: Franklin
County: Williamson

Date Application Received: October 30, 2020
Date Application Deemed Complete: October 30, 2020

Emission Source Reference No: 94-0072
Permit No.: 578641

INTRODUCTION

This narrative is being provided to assist the reader in understanding the content of the attached Title V Operating Permit for this facility. This Title V Permit Statement is written pursuant to Tennessee Air Pollution Control Rule 1200-03-09-.02(11)(f)1(v). The primary purpose of the Title V Operating Permit is to consolidate and identify existing state and federal air requirements applicable to Essex Furukawa Magnet Wire USA LLC and to provide practical methods for assuring compliance with these requirements. The following narrative is designed to accompany the Title V Operating Permit. It initially describes the facility receiving the permit, then the applicable requirements and their significance, and finally the compliance status with those applicable requirements. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public participation process will be described in an addendum to this narrative.

Acronyms
PSD - Prevention of Significant Deterioration
NESHAP - National Emission Standards for Hazardous Air Pollutants
NSPS - New Source Performance Standards
MACT - Maximum Achievable Control Technology
NSR - New Source Review
I. Identification Information

A. Source Description
This facility produces copper and aluminum magnet wire for use in motors and transformers. The following permitted sources exist at this facility:

- 94-0072-05: Twelve Magnet Wire Coating Process Lines (Ovens 201-212) [RACT] Each line consists of annealing furnaces, enamel application, enamel curing ovens, incinerator control and dri-lube application.
- 94-0072-06: Six Magnet Wire Coating Process Lines (Ovens 301-306) [RACT] Each line consists of annealing furnaces, enamel application, enamel curing ovens, incinerator control and dri-lube application.
- 94-0072-17: Five Magnet Wire Coating Process Lines (Ovens 313-317) [RACT] Each line consists of annealing furnaces, enamel application, enamel curing ovens, incinerator control and dri-lube application. An oven with an integral electric/catalytic heating unit is used.
- 94-0072-18: Two Magnet Wire Coating Process Lines (Ovens 601 and 602) Each line consists of annealing furnace, enamel application, enamel curing ovens, incinerator control and dri-lube application.
- 94-0072-22: Two Kewanee Boilers rated at 6.75 MMBtu/hr each These units were installed in 1990 but were previously considered to be insignificant. However, with the promulgation of MACT Subpart DDDDD, these units were required to be permitted.

B. Facility Classification
1. Attainment or Non-Attainment Area Location
   Area is designated as an attainment area for all criteria pollutants.
2. Company is located in a Class II area (this means that the facility is not located within a national park or national wilderness area; see 40 CFR 52.21(e) for complete definition).

C. Regulatory Status
1. PSD/NSR This facility is not a major source for PSD purposes. However, this facility has taken a limit of 235 tons of VOC per year in order to avoid PSD applicability.
2. Title V Major Source Status by Pollutant.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Is the pollutant emitted?</th>
<th>Major Source Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>PM10</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>SO2</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>VOC</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td>NOx</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>CO</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>Individual HAP</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td>Total HAPs</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td>GHG</td>
<td>YES</td>
<td>NO</td>
</tr>
</tbody>
</table>
3. MACT Standards. This source is a major source of HAP. This facility is subject to the following MACT standards:
   40 CFR 63, Subpart MMMM
   40 CFR 63, Subpart DDDDD

This facility is an existing affected source in the magnet wire coating subcategory subject to the requirements of 40 CFR 63, Subpart MMMM. Per §63.3882, the affected source is the collection of all the following items listed that are used for surface coating of miscellaneous metal parts and products within the magnet wire coating subcategory: coating operations; storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings, thinners and or other additives, and cleaning materials; and all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

As shown in the table below, several of the coating operations (ovens) that comprise this affected source have been rebuilt.

<table>
<thead>
<tr>
<th>ESRN:</th>
<th>Oven Number(s)</th>
<th>Construction Date</th>
<th>Rebuild Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>94-0072-05</td>
<td>201</td>
<td>1986</td>
<td>2012</td>
</tr>
<tr>
<td></td>
<td>202</td>
<td>1986</td>
<td>2012</td>
</tr>
<tr>
<td></td>
<td>203</td>
<td>1986</td>
<td>2015</td>
</tr>
<tr>
<td></td>
<td>204</td>
<td>1986</td>
<td></td>
</tr>
<tr>
<td></td>
<td>205</td>
<td>1986</td>
<td>2011</td>
</tr>
<tr>
<td></td>
<td>206</td>
<td>1986</td>
<td>2016</td>
</tr>
<tr>
<td></td>
<td>207</td>
<td>1986</td>
<td>2010</td>
</tr>
<tr>
<td></td>
<td>208</td>
<td>1986</td>
<td></td>
</tr>
<tr>
<td></td>
<td>209</td>
<td>1986</td>
<td>2010</td>
</tr>
<tr>
<td></td>
<td>210</td>
<td>1986</td>
<td></td>
</tr>
<tr>
<td></td>
<td>211</td>
<td>1986</td>
<td></td>
</tr>
<tr>
<td></td>
<td>212</td>
<td>1986</td>
<td></td>
</tr>
<tr>
<td>94-0075-06</td>
<td>301 - 306</td>
<td>1988</td>
<td></td>
</tr>
<tr>
<td>94-0072-16</td>
<td>213 - 216</td>
<td>1996</td>
<td></td>
</tr>
<tr>
<td></td>
<td>217 - 220</td>
<td>2008</td>
<td></td>
</tr>
<tr>
<td>94-0072-17</td>
<td>313</td>
<td>1997</td>
<td></td>
</tr>
<tr>
<td></td>
<td>314</td>
<td>1997</td>
<td></td>
</tr>
<tr>
<td></td>
<td>315</td>
<td>1997</td>
<td></td>
</tr>
<tr>
<td></td>
<td>316</td>
<td>1997</td>
<td>2019</td>
</tr>
<tr>
<td></td>
<td>317</td>
<td>1997</td>
<td></td>
</tr>
<tr>
<td>94-0072-18</td>
<td>601 - 602</td>
<td>2009</td>
<td></td>
</tr>
</tbody>
</table>

Per 40 CFR 63.2, Reconstruction, unless otherwise defined in a relevant standard, means the replacement of components of an affected or a previously nonaffected source to such an extent that:

(1) The fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new source; and

(2) It is technologically and economically feasible for the reconstructed source to meet the relevant standard(s) established by the Administrator (or a State) pursuant to section 112 of the Act. Upon reconstruction, an affected source, or a stationary source that becomes an affected source, is subject to relevant standards for new sources, including compliance dates, irrespective of any change in emissions of hazardous air pollutants from that source.

At such time as the status of the magnet wire coating affected source (all magnet wire coating equipment at this facility) meets the definition of reconstruction as specified above, all process
equipment will become subject to the requirements for a “new magnet wire coating affected source” under 40 CFR 63, Subpart MMMM.

The permittee stated in the modification application dated January 30, 2019, that the cost associated with the proposed replacement of Oven 316, in addition to the costs associated with the previous changes at the facility, do not exceed 50% of the replacement cost, as described in the definition of reconstruction.

4. Program Applicability
   Are the following programs applicable to the facility?
   - PSD (no) - the facility has not undergone PSD review and is not major for PSD purposes
   - NESHAP (yes) - MACT Subpart MMMM and Subpart DDDDD
   - NSPS (no)

5. Non-Applicable Requirements
   The following specific requirements have been identified as not applicable to the facility based on information submitted by the permittee in the Title V application dated August 5, 1997.

<table>
<thead>
<tr>
<th>Regulation</th>
<th>Description</th>
<th>Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>1200-03-27-03(1)(a)</td>
<td>Emission standards for nitrogen oxides</td>
<td>Potential NOx emissions from the entire facility are less than 100 tons per year</td>
</tr>
<tr>
<td>1200-03-18-.31(a)</td>
<td>Solvent metal cleaning</td>
<td>Tanks are used to clean magnet wire coating equipment and equipment parts, they are not used as degreasers.</td>
</tr>
</tbody>
</table>

II. Compliance Information
A. Compliance Status
   Is the facility currently in compliance with all applicable requirements? (yes)
   Are there any applicable requirements that will become effective during the permit term? (no)

III. Other Requirements
A. Emissions Trading
   The facility is not involved in an emission trading program.

B. Acid Rain Requirements
   This facility is not subject to any requirements in Title IV of the Clean Air Act.

C. Prevention of Accidental Releases
   The facility has stated that they are not subject to 1200-03-32.

D. NOx RACT Limits
   The company has taken a 99 ton limit to stay below the applicability threshold for TAPCR 1200-03-27-.03(1)(a). Emissions of NOx are calculated for each month and each 12 consecutive month period to demonstrate compliance with the emission limit. Recordkeeping of all emission calculations is required.

E. Low-NOx Applicability Determination
   Potential NOx emissions from each oven are below 5 tons per year, therefore, the ovens are not subject to low-NOx technology requirements.

F. Compliance Assurance Monitoring (CAM) 40 CFR 64
   Note that the rules provide an exemption for sources that are required to meet MACT limits, as specified below.
§64.2 Applicability.
(b) Exemptions - (1) Exempt emission limitations or standards. The requirements of this part shall not apply to any of the following emission limitations or standards:
   (i) Emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act.

Note that the date of the original proposed rule for 40 CFR 63 Subpart MMMM was 8/13/02 based on a citation at 67 FR 57299. Therefore, this rule qualifies for the MACT exemption as indicated at 40 CFR 64.2(b)(1).

For the ovens at this facility, the combustion of solvent from the coating serves as a source of heat for the evaporation of solvent from the enamel coating. Compliance with the emission limit of 1.0 pounds of HAP per gallon of coating solids is based upon maintaining a minimum incinerator temperature, regardless of whether the oven is categorized as a thermal or catalytic unit. Appendix A to Subpart MMMM of Part 63 recognizes that the combustion of solvents serves as a source of heat for the ovens.

IV. Public Participation Procedures
Notification of this draft permit was sent to the following environmental agencies:
1. U.S. EPA Region IV
2. Kentucky Department for Environmental Protection
3. Nashville Metropolitan Health Department

V. Title V Permit History
The initial Title V Permit (548254) was issued on June 30, 1999.
The first Title V Renewal Permit (556509) was issued on February 5, 2010.
The second Title V Renewal Permit (568956) was issued on May 26, 2016.
This is the third Title V Renewal Permit for this facility.

VI. Allowable / Potential Emissions

<table>
<thead>
<tr>
<th>Source Number</th>
<th>PM</th>
<th>SO₂</th>
<th>CO</th>
<th>VOC²</th>
<th>NOₓ</th>
<th>Max heat input (MMBtu/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>94-0072-05</td>
<td>7.62</td>
<td>0.44</td>
<td>8.83</td>
<td></td>
<td></td>
<td>22.2</td>
</tr>
<tr>
<td>94-0072-06</td>
<td>12.7</td>
<td>0.44</td>
<td>2.38</td>
<td></td>
<td></td>
<td>6.6</td>
</tr>
<tr>
<td>94-0072-16</td>
<td>4.56</td>
<td>0.44</td>
<td>2.89</td>
<td></td>
<td></td>
<td>16</td>
</tr>
<tr>
<td>94-0072-17</td>
<td>0.31</td>
<td>--</td>
<td>--</td>
<td>--</td>
<td></td>
<td>(electric)</td>
</tr>
<tr>
<td>94-0072-18</td>
<td>4.2</td>
<td>0.44</td>
<td>1.15</td>
<td>--</td>
<td></td>
<td>3.2</td>
</tr>
<tr>
<td>94-0072-22</td>
<td>0.87</td>
<td></td>
<td>4.53</td>
<td>--</td>
<td></td>
<td>12.56</td>
</tr>
<tr>
<td>Combined Limit¹</td>
<td></td>
<td></td>
<td></td>
<td>235.0</td>
<td>99.0</td>
<td></td>
</tr>
<tr>
<td>Plantwide Total¹</td>
<td>30.26</td>
<td>1.76</td>
<td>19.78</td>
<td>235.0</td>
<td>99.0</td>
<td>60.56</td>
</tr>
</tbody>
</table>

\( \text{CO₂e} = 60,000 \text{ metric tons} \)

¹ Combined limits and plant-wide total emissions of NOₓ and VOC include emissions from insignificant activities.
² All VOC could potentially be HAP - Phenol, Ethylbenzene, M-Cresol, P-Cresol, Xylene (Mixed Isomers) are some of the HAP contained in the material used for coating magnet wire at this facility.
³ Emission values for pollutants without allowable limits are based on AP-42 Emission Factors for natural gas combustion, Tables 1.4-1 and 1.4-2.
### VII. Dates of Public Comment and EPA review periods

<table>
<thead>
<tr>
<th>Event</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>EPA concurrent review requested</td>
<td></td>
</tr>
<tr>
<td>Public Notice publication date</td>
<td></td>
</tr>
<tr>
<td>Public Notice period completion date</td>
<td></td>
</tr>
<tr>
<td>Public Notice publication comments</td>
<td></td>
</tr>
<tr>
<td>EPA Notification date</td>
<td></td>
</tr>
<tr>
<td>EPA review period completion date</td>
<td></td>
</tr>
<tr>
<td>EPA review comments received</td>
<td></td>
</tr>
<tr>
<td>Final Permit issuance date</td>
<td></td>
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</tbody>
</table>