Facility Name: **Southwire Company – Carrollton**
City: Carrollton
County: Carroll
AIRS #: 04-13-045-00008

Application #: TV- 40558
Date Application Received: September 26, 2016
Permit No: 3357-045-0008-V-05-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name:

   Southwire Company – Carrollton

2. Parent/Holding Company Name

   Southwire Company

3. Previous and/or Other Name(s)

   Copper Division of Southwire Company
   Southwire Copper Division
   Southwire Company Copper Rod Mill
   Southwire Company – Carrollton Building Wire Plant
   Southwire Company – MC Plant
   Southwire Company Corporate Energy Management
   Southwire Machinery Division
   Southwire Company Machine Services
   Southwire Company – Cofer Technology Center
   Southwire Company – Carrollton Utility Products Plant
   Southwire Company – Southwire Tools and Assembled Products

4. Facility Location

   One Southwire Drive, Carrollton, Carroll County, Georgia 30119

5. Attainment, Non-attainment Area Location, or Contributing Area

   Carroll County had been designated as a non-attainment area for particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($PM_{2.5}$). Carroll County had also been determined, by the Division, to be in the 8-hour Atlanta ozone non-attainment area.

   Carroll County has since been approved as an attainment area for the 1997 8-hour ozone standard and the 1997 fine PM standard and currently has a maintenance plan for each of these pollutants in place.

B. Site Determination

The Cofer Technology Center (formerly AFS No. 04500043), Southwire Copper Rod Mill (AFS No. 04500008), Southwire Corporate Energy Management (formerly AFS No. 04500051), Southwire Machinery Division (formerly AFS No. 04500038), Southwire Carrollton Building Wire Plant (formerly AFS No. 04500012), and Southwire Carrollton Utility Products Plant (formerly AFS No. 04500052) comprise one Title I and Title V site. Formerly, each of these facilities had their own AFS No. and Title V Permit. These facilities currently operate under one AFS (AFS No. 04500008) that covers Southwire Company's entire Carrollton main campus.

The permitted Southwire Company – Carrollton consists of eight distinct entities. The entities are as follows:

- Building Wire Plant [BWP] – formerly permitted as Southwire Company – Carrollton Building Wire Plant
- MC [Metal Clad] Plant– formerly permitted as Southwire Company Machine Services
- Copper Rod Mill [CRM] – formerly permitted as Southwire Company Copper Rod Mill
- Utility Products Plant [UPP] – formerly permitted as Southwire Company – Carrollton Utility Products Plant
- Machine Services Group [MSG] – formerly permitted as Southwire Company Machine Services
- Cofer Technology Center [CTC] – formerly permitted as Southwire Company – Cofer Technology Center
- Corporate Energy Management [CEM] – formerly permitted as Southwire Company Corporate Energy Management
- Southwire Tools and Assembled Products [TAP] – facility located at 840 Old Bremen Road (added per Title V Permit Number 3357-045-0008-V-04-5)

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
3357-045-0008-V-04-0	March 28, 2012	Title V Renewal
3357-045-0008-V-04-1	December 4, 2012	502(b)(10) modification for the installation and operation of a fire test chamber for research and development purposes at a satellite facility located at 840 Old Bremen Road.
3357-045-0008-V-04-2	November 26, 2013	502(b)(10) modification for the installation and operation of an electric parts cleaning unit (P360) and 20 new printers (P361-P380) at the MC Cable Plant, and an electric tooling cleaning system (P527) at the Utility Products Plant (UPP). The operation of Process Group Extrusion Line CIC4 at the UPP, and Emergency Generator P817 at the Corporate Energy Management Facility.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
Off Permit Change	May 4, 2014	Off permit change to decommission and replace Existing Fire Test Chamber P951. Southwire must operate the replacement Test Chamber P951 under the same requirements of the previous Test Chamber P951. The facility must also operate existing Venturi Scrubber C951 while P951 is operating and follow specified monitoring requirements.
Off Permit Change	July 8, 2014	Off permit change to install a new natural gas/propane 105 horsepower (Hp) emergency engine, Source P818, at the Building Wire Plant to provide backup power to Building Wire Plant's lighting during periods when power from the local utility is interrupted and for maintenance purposes.
3357-045-0008-V-04-3	August 11, 2014	Significant modification for the construction and operation of new wire and cable testing equipment at the Cofer Technology Center and change the method of operation for the CV Lines P501 and P504 located at the Utility Products Plant.
Off Permit Change	January 9, 2015	Off permit change for the operation of two 11-die drawing machines without annealers (P788 and P798) installed under the cumulative modification exemption specified in Georgia Rule 391-3-1-.03(6)(i)3 and the replacement of five existing Domino inkjet printers with AlphaJet Evo inkjet printers (source P251 (2 units, currently insignificant activities); P263 (insignificant activity); P503 (significant source) and P747 (significant source) to take place in January 2015. The new printers will have the same capacity as the existing units.
3357-045-0008-V-04-4	June 12, 2015	Significant modification for the construction and operation of a new tooling cleaning unit (P696), and the removal the stack requirements from Extrusion Line 665 located at the Building Wire Plant.
Off Permit Change	May 8, 2015	Off permit change to install two inkjet printers on the existing ink application system (P251) associated with extrusion line 750-05 (P250). The system already has two inkjet printers, resulting in a total of four inkjet printers including the printers proposed. The ink application systems will be configured to have two print booths each containing two printers and the print booths will be interlocked such that only one set of printers can operated at one time.
3357-045-0008-V-04-5	September 4, 2015	502(b)(10) modification for the installation and operation of a new coating operation (P970) at the new Southwire Tools and Assembled Products facility located at 840 Old Bremen Road.
Off Permit Change	March 4, 2016	Off permit change to install a dust collector to capture/control nuisance dust around the compound mixing area associated with experimental extrusion activities at the Cofer Technology Center.
Off Permit Change	May 12, 2016	Off permit change to replace the existing gas fired oven Parts Cleaner P154 with an electric Nordson JCP 1724 Jet Cleaner located at the Building Wire Plant.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
Off Permit Change	May 27, 2016	Off permit change to replace the 16 kilowatt (kW) P810 natural gas emergency engine with a 22 kW emergency engine, Source P810.
Off Permit Change	September 26, 2016	Off permit change to allow a French Flame Chamber as an alternate test apparatus to the currently permitted Cube Smoke Chamber at the Cofer Technology Center as specified in your letter dated August 17, 2016. The French Flame Chamber will be subject to the same limitations and requirements as the currently permitted Cube Smoke Chamber.
Off Permit Change	April 11, 2017	Off Permit change to replace the existing Tool Cleaning Unit P786 with Nordson JCP Mini Cleaning Oven located at the Utility Products Plant.
Off Permit Change	June 28, 2017	Off permit change for the removal of two single strand drawing machines (Source Codes 420-04 and 420-01) and their replacement with one duel wire drawing machine at the Utility Products Plant.
Off Permit Change	August 22, 2017	Off permit change to replace the seven (7) kilowatt (kW) Engine P812 gas fired emergency Engine P812 with a nine (9) kW emergency engine, Source P814.

D. Process Description

1. SIC Codes(s)

   3357, 3449, 3351

   The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

   Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

   The facility produces insulated and non-insulated wire.

3. Overall Facility Process Description

Southwire Company, LLC main Carrollton campus consisting of the Building Wire Plant (BWP), Utility Products Plant (UPP), Copper Rod Mill (CRM), MC Plant (MC), Machine Services Group (MSG), Cofer Technology Center (CTC), Corporate Energy (CEM), 12-for-Life, and Southwire Tools and Assembled Products (TAP).

Southwire owned and operated Flatwire Technologies located at 210 Industrial Court in Carrollton, Georgia. This facility's operations did not require an air permit. Since the issuance of the previous Title V Renewal, this facility has ceased operation.

The Building Wire Plant (BWP) produces insulated and non-insulated copper and aluminum wire. The plastics blending area produces plastic compound pellets from plastic resins, plasticizers, fire retardants, fillers and other ingredients. The blended material goes to a steam-heated extrusion process, is quenched in chilled water, diced into pellets and stored in silos. The plastic pellets are either used onsite or at other Southwire manufacturing plants. BWP sizes and insulates electrical wire. First, a coil of rod is despooled, and the size of the rod is reduced in a mechanical drawing process. From drawing, the rod goes to an annealer which relieves stresses caused by the drawing process. The wire is then routed to an extrusion line which applies an insulation coating. Depending on the product, an insulation jacket can also be applied to the wire. Insulated wire is then labeled by an inkjet printing system.

Cofer Technology Center (CTC) is a research and development facility for the analysis of electrical wire and cable properties in support of manufacturing operations.

High purity copper is obtained from off-site suppliers and fed into the shaft furnace to be melted, cast into a continuous bar, and rolled into rod at the Copper Rod Mill (CRM). Copper is top-loaded into the gas fired shaft furnace to be melted in a reducing atmosphere. The molten copper is transferred first to the holding furnace, then to the casting operation, next to the rolling mill, and finally quenching and cooling. The roll (a.k.a copper redraw wire) is then coiled and staged in the warehouse to await shipment.

Southwire maintains a diesel ITS Generator set to provide backup electrical power to corporate ITS operations at Corporate Energy Management (CEM). Southwire also operates three natural gas Waukesha engines and associated generators to provide emergency and peaking power to the Copper Rod mill. Other natural gas engines are maintained to provide emergency power for alarm systems and various backup applications.

The Machine Services Group (MSG) is a support operation for Southwire's manufacturing operations and CRM division. MSG operates various metalworking operations to product/repair parts and equipment, several abrasive blast booths to prepare metal surfaces for painting and a paint booth to coat finished products.

The MC Plant (MC) produces metal clad armored wire and conduit. Similar to BWP and UPP, the MC plant operates drawing, extrusion and ink application processes. However, the main operation at this facility is to enclose finished wire in an aluminum or steel flexible conduit. MC also operates light-tight extrusion lines where a plastic water-proof insulation coating is extruded onto a flexible conduit.

The Utility Products Plant (UPP) produces insulated and noninsulated aluminum and copper wire and cable. UPP sizes and insulates electrical wire and cable. First, a coil of rod is despooled, and the size of the rod is reduced in a mechanical drawing process where oil is used as a coolant. From drawing, the rod goes to an annealer which relieves stresses caused by the drawing process. The wire is then stranded and packaged for shipment or routed to an extrusion line which applies an insulation coating. Insulated wire is then labeled by an inkjet printing system.

12-for-Life is a cooperative education program supported by Southwire Company helping students gain extra motivation to finish 12 years of school. The 12-for-Life students have two main functions; assembly and packaging. In assembly, the students build reels by bolting flanges and staves together. The reels are then used by Building Wire and other locations as packaging for wire products. In packaging, the students repackage products for Building Wire and MC in shorter packages. The activities conducted by the students in this program do not require an air permit.

The Southwire Tools and Assembled Products (TAP) group is a tool assembly and distribution operation.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

The collective operations of the former Southwire Company – Carrollton Building Wire Plant and other Southwire facilities discussed in Section I.B. above are considered a "major source" under Title I PSD regulations.

The former Southwire Utility Products Plant Permit No. 3357-045-0052-V-01-1, issued June 3, 2002, included a NOx emissions cap on the boilers which served to limit NOx emissions below 100 tons per year for the entire Title I site. This NOx emissions limit was classified as a Georgia Rule 391-3-1-.02(2)(yy) Avoidance Limit. Since the last Title V Renewal, the Boilers P296 and P297 have been permanently decommissioned; therefore this limit is no longer applicable.

Per Permit 3351-045-0008-V-02-2, the former Southwire Company Copper Rod Mill received PSD avoidance limits of 9.9 tons per year for PM/PM_{10} emissions and 39.9 tons per year for VOC emissions related to a modification.

Per Permit 3351-045-0008-V-02-3, the former Southwire Company Copper Rod Mill modified PSD avoidance limits established by Permit Number 3351-045-0008-V-02-2 for PM/PM_{10} emissions to 14 tons per year and VOC emission to 39 tons per year. In addition, PSD avoidance limits were established for $PM_{2.5}$ emissions to 14 tons per year.

Per Permit 3357-045-0052-V-01-3, the former Southwire Company – Carrollton Utility Products Plant received PSD avoidance limits of 9.9 tons per year for PM/PM_{10} emissions and 39.9 tons per year for VOC emissions related to a modification.

Per Permit 3357-045-0052-V-01-5, the former Southwire Company – Carrollton Utility Products Plant modified PSD avoidance limits established by Permit Number 3357-045-0052-V-01-3 for PM/PM_{10} emissions to 14 tons per year and VOC emission to 39 tons per year. In addition, PSD avoidance limits were established for $PM_{2.5}$ emissions to 14 tons per year.

Per Permit 3357-045-0012-V-01-3, the former Southwire Company – Carrollton Building Wire Plant received PSD avoidance limits of 9.9 tons per year for PM/PM_{10} emissions and 39.9 tons per year for VOC emissions related to a modification.

Per Permit 3357-045-0012-V-01-5, the former Southwire Company – Carrollton Building Wire Plant modified PSD avoidance limits established by Permit Number 3357-045-0012-V-01-3 for PM/PM_{10} emissions to 14 tons per year and VOC emission to 39 tons per year. In addition, PSD avoidance limits were established for $PM_{2.5}$ emissions to 14 tons per year.

Per Permit 3499-045-0038-02-3, the former Southwire Company – Machine Services received PSD avoidance limits for PM/PM_{10} related to a modification.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Y	✓		
PM_{10}	Y	✓		
$PM_{2.5}$	Y	✓		
SO_2	Y			✓
VOC	Y	✓		
NO_x	Y	✓		
CO	Y	✓		
TRS	Y			✓
H_2S	Y			✓
Individual HAP (methanol)	Y	✓		
Total HAPs	Y	✓		

3. MACT Standards

The Title V Southwire source is a major source of methanol, a hazardous air pollutant (HAP) and a combination of HAPs.

The following facilities located at the Southwire Title V source are potentially subject to MACT standards:

- MC Plant (Assembly Line Printers P361 through P380), Machine Services Group (Paint Booth P316), Utility Products Plant (Paint Booth P001), and Tools and Assembled Products (Blade Coating P970) – 40 CFR 63 Subpart MMMM National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

- MC Plant (UV light-Cured Ink Application Systems 981-10 P358) – 40 CFR 63 Subpart SSSS National Emission Standards for Hazardous Air Pollutants for Metal Coil Surface Coating.

- Corporate Energy Management (Engines P804, P840, P806, P807, P808, P809, P810, P811, P813, P817, and P818) – 40 CFR 63 Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

- Cofer Technology Center (Boiler P911) – 40 CFR 63 Subpart DDDDD National Emission Standard for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters. This regulation was applicable to the Boilers P296 and P297 at the Utility Products Plant. However, as indicated above, the boilers have been permanently decommissioned since the last renewal. This regulation is applicable to facility's remaining Boiler P911.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	N
Program Code 8 – Part 61 NESHAP	N
Program Code 9 - NSPS	Y
Program Code M – Part 63 NESHAP	Y
Program Code V – Title V	Y

.

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Georgia Rule 391-3-1-.02(2)(tt) – "VOC Emissions from Major Sources" is applicable to equipment at the Southwire Title I site as specified in Table 3.1 of the proposed Title V Permit Renewal because potential VOC emissions from Georgia Rule (tt) activities on a combined basis exceed 100 tons per year. As part of this Title V renewal, Southwire updated its RACT Plan to include applicable equipment. VOC RACT was determined as follows.

1. Copper Rod Mill –

   - Operate the Vapor Recovery System during all periods of operation of the Rod Mill Quenching and Cooling System.

   - Route any uncondensed vapor from the Vapor Recovery System to the Rod Mill Shaft Furnace for combustion/destruction purposes. During such periods, the Rod Mill Shaft Furnace shall be operating at a temperature representative of normal source operation.

2. Utility Products Plant –

   - Spray Paint Booths: Use of compliant coatings consistent with Georgia Rule (ii).

   - Plastic Extrusion Lines and Curing: VOC RACT for these emission units is no additional control measures.

   - Ink Application Systems: VOC RACT for these emission units is no additional control measures.

   - Ink Wash Stations: The installation of a cover for the station trough and drainage and for the storage of solvents when the ink wash station is not in use.

   - Boiler: VOC RACT for this emission unit is no additional control measures.

   - Parts Cleaning Oven: VOC RACT for this emission unit is use of integrated afterburner while in operation.

3. Building Wire Plant –

    - Plastic Extrusion Lines and Curing: VOC RACT for these emission units is no additional control measures.

    - Ink Application Systems: VOC RACT for these emission units is no additional control measures.

    - Ink Wash Stations: The installation of a cover for the station trough and drainage and for the storage of solvents when the ink wash station is not in use.

    - Parts Cleaning Ovens: VOC RACT for this emission unit is use of integrated afterburner while in operation. Specifically for P690, limit plastic residue burned off to 56 pounds per week.

4. MC Plant and Machine Services Group –

    - Spray Paint Booth: Use of compliant coatings consistent with Georgia Rule (ii).

    - Strip Coating: VOC RACT for these emission units is use of ultraviolet light-cured coatings.

    - Armoring Operations. VOC RACT for these emission units is no additional control measures.

    - Plastic Extrusion Lines and Curing: VOC RACT for these emission units is no additional control measures.

    - Ink Application Systems: VOC RACT for these emission units is no additional control measures.

    - Ink Wash Stations: The installation of a cover for the station trough and drainage and for the storage of solvents when the ink wash station is not in use.

5. Cofer Technology Center –

    - Vertical Flame Chamber: VOC RACT for this emission unit is no additional control measures.

6. Corporate Energy Management –

   - Internal Combustion Engines: Operation of the non-selective catalytic reduction systems on the peak shaving engines to demonstrate compliance with 40 CFR 63, Subpart ZZZZ is considered VOC RACT. Operation of the emergency ITS generator to demonstrate compliance with 40 CFR 63, Subpart ZZZZ is considered VOC RACT.

   - Waukesha units are equipped with non-selective catalytic reduction (NSCR) to control emissions of NOx and VOC. These units must demonstrate compliance with 40 CFR 63, Subpart ZZZZ is considered VOC RACT. Operation of NSCR is considered RACT for the Waukesha units.

7. Southwire Company Miscellaneous Sources –

   - Spray Paint Booth: Use of compliant coatings consistent with Georgia Rule (ii).

   - Strip Coating: VOC RACT for these emission units is use of ultraviolet light-cured coatings.

   - Wastewater Treatment Plant Evaporator: VOC RACT for these emission units is no additional control measures.

   - Propane Vaporizer: VOC RACT for these emission units is no additional control measures.

   - Various Small Fuel Burning Sources: VOC RACT for these emission units is no additional control measures.

8. Tools and Assembly Plant –

   Per Permit Number 3357-045-0008-V-04-5, Southwire proposed to limit the VOC content for painting operations associated with P970 that utilize air drying to 3.5 pounds of VOC per gallon, excluding water, Alternatively, if a coating containing more than 3.5 pounds of VOC per gallon is used, the solids equivalent must be limited to 6.67 pounds of VOC per gallon of coating solids delivered to the coating applicator. This is the proposed VOC RACT limit with no add on controls. This proposal is consistent with their VOC RACT proposal for similar equipment at the Utility Products Plant. It is also consistent with the requirements of Georgia Rule 391-3-1-.02(2)(ii), should it have been applicable to Blade Coating P790. Since the proposed RACT is consistent with that imposed on existing similar equipment, the Division did not require Southwire to conduct a review of the RACT/BACT/LAER Clearinghouse (RBLC) to determine if VOC control systems have been utilized on processes similar to the painting operations at TAP. Therefore, the Southwire RACT Plan for proposed painting operations will be use of compliant coatings consistent with Georgia Rule 391-3-1-.02(2)(ii) as originally proposed. The Division agrees with Southwire that use of Georgia Rule 391-3-1-.02(2)(ii) compliant coatings which is currently in use for equipment similar to this at Southwire. Therefore, the Division approves the decision that VOC RACT for the Blade Coating P970 is Georgia Rule 391-3-1-.02(2)(ii) compliant coatings.

C. Compliance Status

The applicant did not identify any non-compliance issues.

D. Permit Conditions

Permit Condition 2.3.1 discusses applicability of Georgia Rule 391-3-1-.02(2)(tt) to the Southwire Title I site.

Southwire's updated RACT plan will be included as Appendix D of the Permit Number 3357-045-0008-V-05-0.

III. Regulated Equipment Requirements

A. Equipment List for the Process

3.1 Emission Units

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
Building Wire Plant (B)					
Process Group – Extrusion Line 750-36					
P652	Extruders 750-36	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P653	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.1, 6.1.B.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C653	Dust Filters
P654	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group – Extrusion Line 740-06					
P640	Extruders 740-06	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P641	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.1, 6.1.B.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C641	Dust Filters
P642	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group – Extrusion Line 740-42					
P649	Extruders 740-42	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P650	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.1, 6.1.B.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C650	Dust Filters
P651	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group – Tandem Extrusion Line 750-29					
P644	Extruders 750-29	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P645	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.1, 6.1.B.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C645	Dust Filters
P646	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
P656	Cu Drawing Machine with Annealer 420-29	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.1. 3.2.A.2, 3.2.A.3, 3.2.B.3, 3.4.B.1, 3.4.B.2, 6.1.B.7, 6.2.A.3, 6.2.A.4, 6.2.A.7, 6.2.A.8, 6.2.A.11, 6.2.B.9	None	NA
Process Group – Extrusion Line 750-22					
P631	Extruders 750-22	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P632	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.1, 6.1.B.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C632	Dust Filters
P633	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group – Extrusion Line 750-30					
P634	Extruders 750-30	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P635	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.1, 6.1.B.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C635	Dust Filters
P636	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group – Extrusion Line 750-31					
P637	Extruders 750-31	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P638	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.1, 6.1.B.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C638	Dust Filters
P639	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group – Tandem Extrusion Line 750-33					
P658	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.1, 6.1.B.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C658	Dust Filters
P657	Extruders 750-33	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P659	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
P142	Drawing Machine with Annealer 420-02	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
Process Group – Extrusion Line 740-44					
P663	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.1, 6.1.B.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C663	Dust Filters

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
P662	Extruders 740-44	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P664	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group –Extrusion Line TH-6					
P666	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.1, 6.2.A.9, 6.2.A.10, 6.2.A.11	C666	Dust Filters
P665	Extruders	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P667	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group – Tandem Extrusion Line TL-7					
P673	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.1, 6.1.B.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C673	Dust Filters
P672	Extruders	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 3.5.B.1, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P674	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
P682	Cu Drawing Machine with Anealer	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.1, 3.2.A.2, 3.2.A.3, 3.2.B.3, 3.4.B.1, 3.4.B.2, 6.1.B.7, 6.2.A.3, 6.2.A.4, 6.2.A.7, 6.2.A.8, 6.2.A.11, 6.2.B.9	None	NA
Process Group – Extrusion Line 750-35					
P676	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.1, 6.1.B.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C676	Dust Filters
P675	Extruders 750-35	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P677	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group – Extrusion Line 750-34					
P323	Extruders	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P324	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.1, 6.1.B.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C324	Dust Filters
P325	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group – Extrusion Line 750-38					
P679	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.1, 6.1.B.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C679	Dust Filters

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
P678	Extruders 750-38	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P680	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group – Extrusion Line 750-08					
P112	Extruders 750-08	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
H112	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		C112	Dust Filters
I112	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 750-04					
P113	Extruders 750-04	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
H113	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		C113	Dust Filters
I113	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 750-02					
P114	Extruders 750-02	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
H114	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		C114	Dust Filters
I114	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 740-03					
P118	Extruders 740-03	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
H118	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		C118	Dust Filters
I118	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 750-03					
P119	Extruders 750-03	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
H119	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		C119	Dust Filters
P687	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
Process Group – Extrusion Line 750-06					
P122	Extruders 750-06	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
H122	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		C122	Dust Filters
I122	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
P139	Drawing Machine 420-08	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 750-07					
P117	Extruders 750-07	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
H117	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		C117	Dust Filters
P688	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 750-09					
P123	Extruders 750-09	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
H123	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		C123	Dust Filters
P140	Drawing Machine 420-09	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 740-18					
P115	Extruders 740-18	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
H115	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		C115	Dust Filters
I115	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Tandem Extrusion Line 750-18					
P157	Extruders 750-18	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
P617	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		C010	Dust Filters
P158	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
P144	Drawing Machine 420-18	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
Process Group - Extrusion Line 710-10					
P159	Extruders 710-10	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
P624	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		C023	Dust Filters
P160	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group - Extrusion Line 740-05					
P162	Extruders 740-05	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
P627	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		C013	Dust Filters
P161	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 720-04					
P691	Extruders 720-04	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
H691	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		C691	Dust Filters
I691	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 730-03					
P692	Extruders 730-03	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
H692	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		C692	Dust Filters
I692	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 750-26					
P693	Extruders 750-26	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
P694	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		C694	Dust Filters
P695	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Miscellaneous					
CT1	Cooling Tower 3063-70	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 6.2.A.11	None	NA
CT2	Cooling Tower 3063-71	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 6.2.A.11	None	NA
P154A	Gas Oven	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt)	3.2.B.1, 3.2.B.2, 3.4.B.1, 3.4.B.2, 3.4.B.3, 6.1.B.7, 6.2.B.1, 6.2.B.2, 6.2.B.3	None	NA

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
P154B	Tooling Cleaner	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	3.2.B.1, 3.2.B.2, 3.4.B.1, 3.4.B.2, 6.1.B.7, 6.2.B.1, 6.2.B.2, 6.2.B.3	None	NA
P643	Cu Drawing Machine with Annealer 420-30	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.1, 3.2.A.2, 3.2.A.3, 3.2.B.3, 3.4.B.1, 3.4.B.2, 6.1.B.7, 6.2.A.3, 6.2.A.4, 6.2.A.7, 6.2.A.8, 6.2.A.11, 6.2.B.9	None	NA
P647A	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
P647B	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P647A	None	NA
P648A	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P647A	None	NA
P648B	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P647A	None	NA
P655	Ink Wash Station 865-17	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
P660	Cu Drawing Machine with Annealer 420-10	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.1. 3.2.A.2, 3.2.A.3, 3.2.B.3, 3.4.B.1, 3.4.B.2, 6.1.B.7, 6.2.A.3, 6.2.A.4, 6.2.A.7, 6.2.A.8, 6.2.A.11, 6.2.B.9	None	NA
P661	Cu Seven-Wire Drawing Machine with Annealer 485-02	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.1, 3.2.A.2, 3.2.A.3, 3.2.B.3, 3.4.B.1, 3.4.B.2, 6.1.B.7, 6.2.A.3, 6.2.A.4, 6.2.A.7, 6.2.A.8, 6.2.A.11, 6.2.B.9	None	NA
P668	Rework Line Printer 975-73	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
P669	Floater Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.B.1, 3.4.B.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
P670	Raw Material Silo 792-01	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.2, 5.2.B.3, 6.1.B.7, 6.2.A.11, 6.2.B.7, 6.2.B.8	C670	Bin Vent Filter
P671	Raw Material Silo 792-02	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.2, 5.2.B.3, 6.1.B.7, 6.2.A.11, 6.2.B.7, 6.2.B.8	C671	Bin Vent Filter

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
P681	Cu/Al Drawing Machine with Annealer	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.1, 3.2.A.2, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.1, 6.1.B.7, 6.2.A.3, 6.2.A.4, 6.2.A.7, 6.2.A.8, 6.2.A.11	C681	Oil Mist Collector
P683	PVC Storage Silo 792-07	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.2, 5.2.B.3, 6.1.B.7, 6.2.A.11, 6.2.B.7, 6.2.B.8	C683	Bin Vent Filter
P684	PVC Storage Silo	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.2, 5.2.B.3, 6.1.B.7, 6.2.A.11, 6.2.B.7, 6.2.B.8	C684	Bin Vent Filter
P685	PVC Storage Silo	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.B.1, 3.4.B.2, 5.2.B.2, 5.2.B.3, 6.1.B.7, 6.2.A.11, 6.2.B.7, 6.2.B.8	C685	Bin Vent Filter
P689	Cu Drawing Machine with annealer	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.B.3, 3.4.B.1, 3.4.B.2, 6.1.B.7, 6.2.A.3	None	NA
P690	Tooling Cleaning Unit	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.B.4, 3.2.B.5, 3.4.B.1, 3.4.B.2, 6.1.B.7, 6.2.B.4, 6.2.B.5, 6.2.B.6	None	NA
P696	Tooling Cleaning Unit	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.B.4, 3.2.B.5, 3.4.B.1, 3.4.B.2, 6.2.B.4, 6.2.B.5, 6.2.B.6	None	NA
Process Group – PVC and Nylon Extrusion Line S1 (12FL)					
P921	Extruder	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
P922	Hoppers	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.4.B.1, 3.4.B.2	C922	Dust Filters
P923	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
Process Group – PVC and Nylon Extrusion Line S2 (12FL)					
P924	Extruder	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
P925	Hoppers	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.4.B.1, 3.4.B.2	C925	Dust Filters
P926	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
Process Group – PVC and Nylon Extrusion Line S3 (12FL)					
P927	Extruder	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA
P928	Hoppers	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.4.B.1, 3.4.B.2	C928	Dust Filters
P929	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.B.1, 3.4.B.2	None	NA

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
MC Plant [C]					
Process Group – Extrusion Line 740-51					
P326	Extruders 740-51	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.C.1, 3.4.C.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P327	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.C.1, 3.4.C.2, 5.2.C.1, 6.1.C.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C327	Dust Filters
P328	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.C.1, 3.4.C.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group – Tandem Extrusion Line 756-01					
P330	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.C.1, 3.4.C.2, 5.2.C.1, 6.1.C.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C330	Dust Filters
P329	Extruders 756-01	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.C.1, 3.4.C.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P331	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.C.1, 3.4.C.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
P332	Cu Drawing Machine with Annealer 420-32	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.1, 3.2.A.2, 3.2.A.3, 3.2.C.1, 3.4.C.1, 3.4.C.2, 6.1.C.7, 6.2.A.3, 6.2.A.4, 6.2.A.7, 6.2.A.8, 6.2.A.11, 6.2.C.8	None	NA
Process Group – Extrusion Line JL3					
P334	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.C.1, 3.4.C.2, 5.2.C.1, 6.1.C.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C334	Dust Filters
P333	Extruders	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.C.1, 3.4.C.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P335	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.C.1, 3.4.C.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group – Extrusion Line JL4					
P337	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.C.1, 3.4.C.2, 5.2.C.1, 6.1.C.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C337	Dust Filters
P336	Extruder	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.C.1, 3.4.C.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P338	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.C.1, 3.4.C.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group – Extrusion Line TH2					
P347	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.C.1, 3.4.C.2, 5.2.C.1, 6.1.C.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C347	Dust Filters

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
P346	Extruders	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.C.1, 3.4.C.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P348	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.C.1, 3.4.C.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group – Extrusion Line TH3					
P350	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.C.1, 3.4.C.2, 5.2.C.1, 6.1.C.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C350	Dust Filters
P349	Extruders	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.C.1, 3.4.C.2, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
P351	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.C.1, 3.4.C.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group: LT Extrusion Line 740-55					
P352	Extruders 740-55	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.C.1, 3.4.C.2	None	NA
P353	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		None	NA
P354	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group: Extrusion Line LT2					
P355	Extruders	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.C.1, 3.4.C.2	None	NA
P356	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		None	NA
P357	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Miscellaneous					
P319A	Buncher 680-44 Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.C.1, 3.4.C.2, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
P319B	Coiler 842-55 Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P319A	None	NA
P320A	Rewinder 825-02 Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P319A	None	NA
P320B	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P319A	None	NA
P321A	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P319A	None	NA
P321B	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P319A	None	NA

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
P322A	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P319A	None	NA
P322B	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P319A	None	NA
P345	Floater Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P319A	None	NA
P339 thru P344	Buncher Ink Application Systems P339 through P344	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P319A	None	NA
MC1 thru MC75	MC Armoring Lines 1 through 75	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.1, 3.2.A.3, 3.4.C.1, 3.4.C.2, 6.2.A.11	None	NA
P358	UV light-Cured Ink Application Systems 981-10	40 CFR 60 Subpart A 40 CFR 60 Subpart TT 40 CFR 63 Subpart A 40 CFR 63 Subpart SSSS 391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(v)	3.3.C.1, 3.3.C.2, 3.3.C.3, 3.3.C.4, 3.4.C.1, 3.4.C.2, 3.4.C.3, 3.4.C.4, 4.2.C.1, 4.2.C.2, 6.1.C.7, 6.2.C.1, 6.2.C.2, 6.2.C.3, 6.2.C.4, 6.2.C.5, 6.2.C.6, 6.2.C.7	None	NA
P360	Electric Parts Cleaning Unit	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.C.2, 3.4.C.1, 3.4.C.2, 6.2.C.9, 6.2.C.10, 6.2.C.11	None	NA
P361 thru P380	MC Armoring Line Printers P361 through P380	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt) 40 CFR 63 Subpart A 40 CFR 63 Subpart MMMM	3.3.C.5, 3.3.C.6, 3.3.C.7, 3.3.C.8, 3.3.C.9, 3.4.C.1, 3.4.C.2, 3.4.C.5, 3.4.C.6, 6.1.C.7, 6.2.C.12, 6.2.C.13, 6.2.C.14, 6.2.C.15, 6.2.C.16	None	NA

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
Copper Rod Mill (D)					
Process Group – Rod Mill					
F409	Rod Mill Shaft Furnace	391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.D.1, 3.4.D.1, 3.4.D.2, 3.4.D.3, 3.4.D.5, 6.1.D.7, 6.2.D.1, 6.2.D.2, 6.2.D.3	None	NA
Q467	Rod Mill Quenching and Cooling System	40 CFR 64 391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.D.1, 3.4.D.1, 3.4.D.2, 3.4.D.4, 3.4.D.5, 5.2.D.2, 5.2.D.3, 6.1.D.7, 6.2.D.1, 6.2.D.2, 6.2.D.3	A467 F409	Vapor Recovery System Rod Mill Shaft Furnace
Miscellaneous					
P477	Cu Drawing Machine with Annealer	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.1, 3.2.A.2, 3.2.A.3, 3.2.D.2, 3.4.D.1, 3.4.D.2, 6.1.D.7, 6.2.A.3, 6.2.A.4, 6.2.A.7, 6.2.A.8, 6.2.A.11, 6.2.D.7	None	NA
P478	Cu/Al Drawing Machine with Annealer	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.1, 3.2.A.2, 3.2.A.3, 3.4.D.1, 3.4.D.2, 5.2.D.1, 6.1.D.7, 6.2.A.3, 6.2.A.4, 6.2.A.7, 6.2.A.8, 6.2.A.11	C478	Oil Mist Collector
F476	Electric Induction Vertirod Copper Rod Production Unit	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt)	3.2.A.1, 3.2.A.2, 3.2.A.3, 3.4.D.1, 3.4.D.2, 3.4.D.3, 6.2.A.7, 6.2.A.11, 6.2.D.4, 6.2.D.5, 6.2.D.6	None	NA
BE1	Bucket Elevator 1	391-3-1-.02(2)(n)	3.2.A.1, 3.2.A.3, 3.4.D.6, 3.4.D.7, 6.2.A.11	None	NA

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
Utility Products Plant (E)					
Process Group – Extrusion Line 735-08					
P736	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.E.1, 3.4.E.3, 5.2.E.3, 6.1.E.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C736	Dust Filters
P735	Extruders 735-08	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.E.1, 3.4.E.3, 6.2.A.5, 6.2.A.6, 6.2.A.7, 6.2.E.26, 6.2.E.27	None	NA
P737	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.E.1, 3.4.E.3, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group - Extrusion Line 750-45					
P742	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.E.1, 3.4.E.3, 5.2.E.3, 6.1.E.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C742	Dust Filters
P741	Extruders 750-45	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.E.1, 3.4.E.3, 6.2.A.5, 6.2.A.6, 6.2.A.7, 6.2.E.26, 6.2.E.27	None	NA
P743	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.E.1, 3.4.E.3, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group – Extrusion Line 735-16					
P749	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.E.1, 3.4.E.3, 5.2.E.3, 6.2.A.9, 6.2.A.10, 6.2.A.11	C749	Dust Filters
P748	Extruders 735-16	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.E.1, 3.4.E.3, 6.2.A.5, 6.2.A.6, 6.2.A.7, 6.2.E.26, 6.2.E.27	None	NA
P750	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.E.1, 3.4.E.3, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group – Extrusion Line					
P752	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.2.A.1, 3.2.A.3, 3.4.E.1, 3.4.E.3, 5.2.E.3, 6.1.E.7, 6.2.A.9, 6.2.A.10, 6.2.A.11	C752	Dust Filters
P751	Extruders	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.E.1, 3.4.E.3, 6.2.A.5, 6.2.A.6, 6.2.A.7, 6.2.E.26, 6.2.E.27	None	NA
P753	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.E.1, 3.4.E.3, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
P754	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.E.1, 3.4.E.3, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
P755	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.E.1, 3.4.E.3, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
Process Group –Extrusion Line 750-05					
P250	Extruders 750-05	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.E.1, 3.4.E.3	None	NA
H250	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		None	NA
P251	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 720-05					
P254	Extruders 720-05	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.E.1, 3.4.E.3	None	NA
H254	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		None	NA
P255	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 731-01					
P258	Extruders 731-01	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.E.1, 3.4.E.3, 6.2.A.5, 6.2.A.6, 6.2.A.7	None	NA
H258	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.4.E.1, 3.4.E.3	None	NA
P259	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.E.1, 3.4.E.3	None	NA
Process Group – Extrusion Line 730-02					
P260	Extruders 730-02	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.E.1, 3.4.E.3	None	NA
H260	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		None	NA
P261	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 740-02					
P262	Extruders 740-02	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.E.1, 3.4.E.3	None	NA
H262	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		None	NA

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
P263	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 735-03					
P264	Extruders 735-03	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.E.1, 3.4.E.3	None	NA
H264	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		None	NA
P265	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 735-09					
P266	Extruders 735-09	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.E.1, 3.4.E.3	None	NA
H266	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		None	NA
P267	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 735-14					
P293	Extruders 735-14	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.E.1, 3.4.E.3	None	NA
H293	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		None	NA
I293	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 735-15					
P294	Extruders 735-15	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.E.1, 3.4.E.3	None	NA
H294	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		None	NA
I294	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	NA
Process Group – Extrusion Line 910-00					
P299	Extruders 910-00	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.E.1, 3.4.E.3	None	N/A
I299	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)		None	N/A
H299	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		None	N/A

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
Process Group – Extrusion Line 737-02 (CIC2)					
P764	Extruders 737-02	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.E.1, 3.4.E.3	None	NA
P765	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		C765	Dust Filters
Process Group – Extrusion Line 737-01 (CIC1)					
P770	Extruders 737-01	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.E.1, 3.4.E.3	None	NA
P771	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		C771	Dust Filters
Process Group – Extrusion Line 737-03 (CIC3)					
P783	Extruders CIC3	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.E.1, 3.4.E.3	None	NA
P784	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		None	NA
UPP Main Plant Miscellaneous					
P280	Plastic Pellet Silo North 3065-09	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.4.E.1, 3.4.E.3, 3.5.E.1, 5.2.E.2, 6.1.E.7,	C280	Fabric Filter
P281	Plastic Pellet Silo South 3065-09	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	Same as P280	C281	Fabric Filter
P760	Plastic Pellet Silo 3065-10	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	Same as P280	C760	Fabric Filter
P761	Plastic Pellet Silo 3065-06	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	Same as P280	C761	Fabric Filter
CS5	1.5 MMBtu/hr Preheat Oven 3059-16	391-3-1-.02(2)(d) 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	3.4.E.1, 3.4.E.3	None	NA
CS6	1.5 MMBtu/hr Preheat Oven 3059-14	391-3-1-.02(2)(d) 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	Same as CS5	None	NA
CS9	1.5 MMBtu/hr Preheat Oven 3059-15	391-3-1-.02(2)(d) 391-3-1-.02(2)(b) 391-3-1-.02(2)(g)	Same as CS5	None	NA
P721	5.21 MMBtu/hr Annealing Furnace 1080-21	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt)	3.2.A.1, 3.2.A.2, 3.2.A.3, 3.4.E.1, 3.4.E.3, 3.4.E.5, 6.2.A.7, 6.2.A.11	None	NA
P723-P734	Flame Burners	391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt)	3.2.A.1, 3.2.A.2, 3.2.A.3, 3.4.E.2, 3.4.E.4, 3.4.E.5, 6.2.A.7, 6.2.A.11	None	NA
P744	Drawing Machine with Annealer 450-05	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.1, 3.2.A.2, 3.2.A.3, 3.4.E.1, 3.4.E.3, 5.2.E.3, 6.1.E.7, 6.2.A.3, 6.2.A.4, 6.2.A.7, 6.2.A.8, 6.2.A.11	C744	Oil Mist Collector
P745	Parts Cleaner with Afterburner	391-3-1-.02(2)(e) 391-3-1-.02(2)(g) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.E.1, 3.2.E.2, 3.4.E.1, 3.4.E.3, 3.4.E.5, 6.1.E.7, 6.2.E.4, 6.2.E.5, 6.2.E.6	None	NA

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
P746	Floater Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.2, 3.4.E.1, 3.4.E.3, 6.2.A.1, 6.2.A.2, 6.2.A.7	None	NA
P747	Floater Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P746	None	NA
P756	Drawing Machine with Annealer	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.A.1, 3.2.A.2, 3.2.A.3, 3.4.E.1, 3.4.E.3, 5.2.E.3, 6.1.E.7, 6.2.A.3, 6.2.A.4, 6.2.A.7, 6.2.A.8, 6.2.A.11	C756	Oil Mist Collector
P759	Electric Induction Annealer	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.E.1, 3.4.E.3	NA	None
P766	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.E.1, 3.4.E.3	None	NA
P767	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P766	None	NA
P768	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P766	None	NA
P769	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P766	None	NA
P772	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P766	None	NA
P773	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P766	None	NA
P774	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P766	None	NA
P775	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P766	None	NA
P001	Spray Paint Booth	40 CFR 63 Subpart A 40 CFR 63 Subpart MMMM 391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.3.E.1, 3.3.E.2, 3.3.E.3, 3.3.E.4, 3.3.E.5, 3.4.E.1, 3.4.E.3, 3.4.E.6, 3.4.E.7, 5.2.E.1, 5.2.E.4, 6.1.E.7, 6.2.E.1, 6.2.E.2, 6.2.E.3, 6.2.E.23, 6.2.E.24, 6.2.E.25	C001	Overspray Filter
P786	Electric Fluidized Bed Tooling Cleaning Unit	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.E.5, 3.2.E.6, 3.4.E.1, 3.4.E.3, 6.1.E.7, 6.2.E.20, 6.2.E.21, 6.2.E.22	None	N/A
Process Group: Extrusion Line CV6					
P501	Extruders	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.E.3, 3.2.E.4, 3.4.E.1, 3.4.E.3, 3.5.E.3, 3.5.E.4, 6.1.E.7, 6.2.E.15, 6.2.E.16, 6.2.E.17, 6.2.E.18, 6.2.E.19	None	NA
P502	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.4.E.1, 3.4.E.3	None	NA

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
P503	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.E.3, 3.4.E.1, 3.4.E.3, 6.1.E.7, 6.2.E.7, 6.2.E.8, 6.2.E.17	None	NA
Process Group: Extrusion Line CV7					
P504	Extruders	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P501	None	NA
P505	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	Same as P502	None	NA
P506	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P503	None	NA
Process Group: Extrusion Line CV8					
P507	Extruders	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.E.3, 3.2.E.4, 3.4.E.1, 3.4.E.3, 3.5.E.3, 6.1.E.7, 6.2.E.15, 6.2.E.16, 6.2.E.17, 6.2.E.18, 6.2.E.19	None	NA
P508	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	Same as P502	None	NA
P509	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P503	None	NA
Process Group: Extrusion Line CV9					
P510	Extruders	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P507	None	NA
P511	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	Same as P502	None	NA
P512	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P503	None	NA
Process Group: Extrusion Line CV10					
P513	Extruders	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P507	None	NA
P514	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	Same as P502	None	NA
P515	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P503	None	NA
Process Group: Extrusion Line CV11					
P516	Extruders	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P507	None	NA
P517	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	Same as P502	None	NA
P518	Ink Application System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P503	None	NA
Process Group: Extruder Line 735-17					
P519	Extruders	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.E.3, 3.4.E.1, 3.4.E.3, 6.1.E.7, 6.2.E.11, 6.2.E.12, 6.2.E.17	None	NA
P520	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.4.E.1, 3.4.E.3	None	NA

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
Process Group: Extruder Line 735-18					
P521	Extruders	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P519	None	NA
P522	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	Same as P520	None	NA
UPP Medium Voltage Miscellaneous					
P523	12-hour Natural Gas-Fired Annealing Furnace	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt)	3.2.E.3, 3.4.E.1, 3.4.E.5, 4.2.E.1, 6.1.E.7, 6.2.E.13, 6.2.E.14, 6.2.E.17	NA	None
P524	Single-wire Drawing Machine with Annealer	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.E.3, 3.4.E.1, 3.4.E.3, 3.5.E.2, 5.2.E.3, 6.1.E.7, 6.2.E.9, 6.2.E.10, 6.2.E.17	C524	Oil Mist Collector
P525	Two-wire Drawing Machine with Annealer	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P524	C525	Oil Mist Collector
P526	2-Die Drawing Machine	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.E.3, 3.4.E.1, 3.4.E.3, 6.2.E.9, 6.2.E.10, 6.2.E.17	NA	None
P527	Electric Tooling Cleaning Unit	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.E.7, 3.2.E.8, 3.4.E.1, 3.4.E.3, 6.1.E.7, 6.2.E.28, 6.2.E.29, 6..2.E.30	None	NA
Process Group – Extrusion Line 737-04 (CIC4)					
P787	Extruders CIC4	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.4.E.1, 3.4.E.3	None	NA
H787	Plastic Pellet Feed Hopper System	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)		None	NA

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
Machine Services Group (F)					
P316	Spray Paint Booth	391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt) 40 CFR 63 Subpart A 40 CFR 63 Subpart MMMM	3.3.F.1, 3.3.F.2, 3.3.F.3, 3.3.F.4, 3.3.F.5, 3.4.F.1, 3.4.F.2, 3.4.F.3, 3.4.F.4, 5.2.F.1, 6.1.F.7, 6.2.F.1, 6.2.F.2, 6.2.F.3, 6.2.F.4, 6.2.F.5, 6.2.F.6	C16A C16B	Fiberglass Filters
P308	Shot Blasting Booth	40 CFR 64 391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.4.F.1, 3.4.F.2, 5.2.F.1, 5.2.F.2, 5.2.F.4, 6.1.F.7, 6.2.F.1	C308	Baghouse
P306	Goff Shot Peening Machine	40 CFR 64 391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.4.F.1, 3.4.F.2, 5.2.F.1, 5.2.F.2, 5.2.F.3, 6.1.F.7, 6.2.F.1	C306	Fabric Filter
P307	Guyson Shot Blasting Machine	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.4.F.1, 3.4.F.2, 5.2.F.1, 6.1.F.7, 6.2.F.1	C307	Fabric Filter
P305	Empire Shot Blasting Machine	391-3-1-.02(2)(e) 391-3-1-.02(2)(b)	3.4.F.1, 3.4.F.2, 5.2.F.1, 6.1.F.7, 6.2.F.1	C305	Fabric Filter

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
Cofer Technology Center (G)					
P910	Vertical tray flame chamber	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	3.2.G.1, 3.2.G.2, 3.2.G.3, 3.2.G.4, 3.2.G.8, 3.2.G.9, 3.2.G.10, 3.2.G.11, 3.2.G.12, 3.4.G.1, 3.4.G.2, 3.4.G.5, 5.2.G.1, 5.2.G.2, 5.2.G.3, 5.2.G.4, 6.1.G.7, 6.2.G.1, 6.2.G.2, 6.2.G.5	C910 OR C912	C910 – Flat bed HEAF fabric filter / mist eliminator C912 – Dual Scrubber
P912	Cone Calorimeter	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	3.2.G.1, 3.2.G.2, 3.2.G.3, 3.2.G.8, 3.2.G.9, 3.2.G.10, 3.2.G.11, 3.2.G.12, 3.4.G.1, 3.4.G.5, 5.2.G.1, 5.2.G.2, 5.2.G.3, 5.2.G.4, 6.1.G.7, 6.2.G.1, 6.2.G.2, 6.2.G.5		
P913	French Flame Chamber	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	Same as P912		
P911	0.42 MMBtu/hr Propane-Fired Boiler	40 CFR 63 Subpart A 40 CFR 63 Subpart DDDDD 391-3-1-.02(2)(d) 391-3-1-.02(2)(g) 391-3-1-.02(2)(tt)	3.3.G.1, 3.3.G.2, 3.3.G.3, 3.4.G.2, 3.4.G.4, 5.2.G.5, 6.2.G.6, 6.2.G.7	N/A	N/A
P951	Fire Test Chamber	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	3.2.G.5, 3.2.G.6, 3.2.G.7, 3.4.G.1, 3.4.G.5, 5.2.G.2, 5.2.G.3, 6.2.G.3, 6.2.G.4	C951	Scrubber
P909	CTC Extruder	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 391-3-1-.02(2)(tt)	3.2.A.1, 3.2.A.2, 3.2.A.3, 3.4.G.1, 3.4.G.5, 6..2.A.7, 6.2.A.11	N/A	N/A

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
Corporate Energy Management (H)					
P804	1,552 hp gas-fired Waukesha Engine	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 40 CFR 60 Subpart A 40 CFR 60 Subpart JJJJ 391-3-1-.02(2)(g) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(mmm)	3.2.H.3, 3.3.H.1, 3.3.H.3, 3.3.H.4, 3.3.H.5, 3.3.H.6, 3.3.H.7, 3.3.H.8, 3.4.H.1, 3.4.H.2, 3.4.H.3, 3.5.H.1, 4.2.H.1, 4.2.H.2, 4.2.H.3, 4.2.H.4, 4.2.H.5, 4.2.H.6, 4.2.H.7, 4.2.H.8, 4.2.H.9, 5.2.H.1, 5.2.H.2, 5.2.H.3, 5.2.H.4, 6.1.H.7, 6.2.H.1, 6.2.H.2, 6.2.H.3, 6.2.H.4, 6.2.H.5, 6.2.H.6, 6.2.H.8, 6.2.H.9, 6.2.H.10	C804	Air/Fuel Ratio Controller and Non-Selective Catalytic Reduction
P805	1,548 hp gas-fired Waukesha Engine	40 CFR 60 Subpart A 40 CFR 60 Subpart JJJJ 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(g) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(mmm)	See P804	C805	Air/Fuel Ratio Controller and Non-Selective Catalytic Reduction
P806	1,548 hp gas-fired Waukesha Engine	40 CFR 60 Subpart A 40 CFR 60 Subpart JJJJ 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(g) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt) 391-3-1-.02(2)(mmm)	See P804	C806	Air/Fuel Ratio Controller and Non-Selective Catalytic Reduction
P807	752 hp diesel-fired ITS Generator	40 CFR 60 Subpart A 40 CFR 60 Subpart IIII 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(g) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.H.1, 3.2.H.2, 3.3.H.2, 3.3.H.9, 3.3.H.13, 3.3.H.15, 3.4.H.1, 3.4.H.4, 6.1.H.7, 6.2.H.1, 6.2.H.7, 6.2.H.13	None	None
P808	50 kW diesel-fired CRM backup telephone generator	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(g) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.3.H.11, 3.3.H.14, 3.4.H.1, 5.2.H.5, 6.1.H.7, 6.2.H.11, 6.2.H.12	None	None
P809	11 kW gas-fired CRM backup lighting generator	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(g) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P810	None	None
P810	22 kW gas-fired backup scale house generator	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(g) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.3.H.12, 3.3.H.14, 3.4.H.1, 5.2.H.5, 6.1.H.7, 6.2.H.11, 6.2.H.12	None	None
P811	7 kW gas-fired backup MSG warning horn generator	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(g) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P810	None	None

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
P813	500 kW diesel-fired backup storm water generator	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(g) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.2.H.1, 3.2.H.2, 3.3.H.10, 3.4.H.1, 6.1.H.7, 6.2.H.1	None	None
P817	7 kW gas-fired backup UPP warning horn generator	40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(g) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P810	None	None
P818	9 kW natural gas-/propane fired backup BWP lighting generator	40 CFR 60 Subpart A 40 CFR 60 Subpart JJJJ 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ 391-3-1-.02(2)(g) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	Same as P810	None	None

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
Tools and Assembled Products (I)					
P970	Blade Coating	40 CFR 63 Subpart A 40 CFR 63 Subpart MMMM 391-3-1-.02(2)(e) 391-3-1-.02(2)(b) 391-3-1-.02(2)(tt)	3.3.I.1, 3.3.I.2, 3.3.I.3, 3.3.I.4, 3.3.I.5, 3.4.I.1, 3.4.I.2, 3.4.I.3, 3.4.I.4, 5.2.I.1, 6.1.I.7, 6.2.I.1, 6.2.I.2, 6.2.I.3, 6.2.I.4, 6.2.I.5	None	NA

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

B. Equipment & Rule Applicability

Emission and Operating Caps:

1. Copper Rod Mill –

Permit Number 3351-045-0008-V-02-2 established PM_{10} PSD avoidance limits of 9.9 tons per year for the extrusion pellet hopper lines, drawing machines, and storage silos installed at the Southwire Title I Source. The total PM_{10} limit for the proposed equipment was 14.93 tons per year. The 112(g) avoidance limits were established for methanol emissions (from moisture curing extrusion and moisture-cure curing) and methyl ethyl ketone emissions (from ink-jet printing) located at the Southwire Title V Source to 9.9 tons per year each. Total HAPs emissions were also limited to 24.9 TPY.

In the permit application associated with Permit Number 3351-045-0008-V-02-3, Southwire proposed to modify existing PSD limits to include applicable equipment per modifications at the Utility Products Plant and the Building Wire Plant. Southwire evaluated the net emissions increase of the applicable operations. As a result of the increased utilization analysis, PVC and XLPE Blending capacities increased to 45,950 tons and 6,500 tons, respectively. Southwire concluded that PM_{10} and VOC emissions associated with PVC and XLPE Blending needed to be included under the previously requested PM_{10} and VOC emissions limits. Southwire concluded that previously requested 9.9 tons per year PM_{10} limit (covering new drawing, hoppers, and silos) needed to be adjusted to cover all PM_{10} emitting sources included in the September 2004 limit. Southwire also concluded that there was no additional impact to Curing resulting in the potential increase of other PSD/NSR pollutants. Therefore, Southwire decided to modify existing PM_{10} PSD avoidance limits. The Division imposed a PM_{10} emissions limit of 14 tons per 12 consecutive month period. Because PM_{10} emissions are considered a surrogate of $PM_{2.5}$ emissions as discussed above, the Division imposed a $PM_{2.5}$ emissions limit equivalent to the PM_{10} emissions limit. The Division also imposed a VOC emissions limit of 39 tons per 12 consecutive month period rather than the previously requested VOC emissions limit of 39.9 tons per 12 consecutive month period.

2. Utility Products Plant –

Utility Products Plant Permit No. 3357-045-0052-V-01-1 limited NOx emissions from the boilers to below 100 tons per year for the entire Title I site. This NOx emissions limit was classified as a Georgia Rule 391-3-1-.02(2)(yy) Avoidance Limit. This limit has been removed as part of this Title V Renewal since the Boilers P296 and P297 are no longer operated.

Permit Number 3357-045-0052-V-01-3 established PM_{10} PSD avoidance limits of 9.9 tons per year for the extrusion pellet hopper lines, drawing machines, and storage silos installed at the Southwire Title I Source. The total PM_{10} limit for the proposed equipment was 14.93 tons per year. The 112(g) avoidance limits were established for methanol emissions (from moisture curing extrusion and moisture-cure curing) and methyl ethyl ketone emissions (from ink-jet printing) located at the Southwire Title V Source to 9.9 tons per year each. Total HAPs emissions were also limited to 24.9 TPY.

In the permit application associated with Permit Number 3357-045-0052-V-01-5, Southwire proposed to modify existing PSD limits to include applicable equipment per modifications at the Utility Products Plant and the Building Wire Plant (BWP). Southwire evaluated the net emissions increase of the applicable operations. As a result of the increased utilization analysis, Southwire concluded that PM_{10} and VOC emissions associated with PVC and XLPE Blending above 45,950 tons and 6,500 tons, respectively, needed to be included under the previously requested PM_{10} and VOC emissions limits. Southwire concluded that previously requested 9.9 tons per year PM_{10} limit (covering new drawing, hoppers, and silos) needed to be adjusted to cover all PM_{10} emitting sources included in the September 2004 limit. Southwire also concluded that there was no additional impact to Curing resulting in the potential increase of other PSD/NSR pollutants. Therefore, Southwire decided to modify existing PM_{10} PSD avoidance limits to include the proposed equipment. The Division imposed a PM_{10} emissions limit of 14 tons per 12 consecutive month period. Because PM_{10} emissions are considered a surrogate of $PM_{2.5}$ emissions as discussed above, the Division imposed a $PM_{2.5}$ emissions limit equivalent to the PM_{10} emissions limit. The Division also imposed a VOC emissions limit of 39 tons per 12 consecutive month period rather than the previously requested VOC emissions limit of 39.9 tons per 12 consecutive month period.

Per Permit Number 3357-045-0052-V-02-1, the Division limited emissions of HAP emissions to nine (9) tons per year of any hazardous air pollutant and 24 tons per year of any combination of hazardous air pollutants as a result of the proposed modification. In addition, Southwire took a non-attainment NSR avoidance limit of 39 tons per year for VOC emissions resulting from the proposed modification.

Each of the CV Extrusion lines permitted under Permit Number 3357-045-0052-V-02-1 is equipped with four extruders. To ensure that only three extruders are operated at any given time, the Division imposed a limit on the number of extruders in operation at one time.

To ensure that the proposed drawing machines permitted under Permit Number 3357-045-0052-V-02-1 can comply with applicable particulate matter emissions regulations, the Division has also required that the proposed oil mist collectors, particulate matter emissions control equipment associated with the proposed drawing machines, be operated at all times the drawing machines are in operation.

Per Permit Number 3357-045-0052-V-02-4, a permit restriction not allowing the cleaning of PVC-coated or nylon-coated parts was added for the tooling cleaning unit (Source ID Code: P786) which will clean polyethylene-, cross-linked polyethylene-, polypropylene-, and rubber-coated parts only. In addition, VOC emissions were limited based on a proposed permit restriction not allowing the cleaning of plastic parts in excess of 4,160 pounds on a twelve month rolling basis.

However, there are no emissions from the metal parts themselves during the cleaning process, only the quantity of residue removed from the parts. Therefore, applicable permit conditions are being modified per Permit Number 3557-045-0052-V-02-6 to correctly limit the amount of residue removed of the parts cleaned in P786. Changing the operating limit will not result in an increase in emissions as emission estimates for P786 operations are based on pounds of residue removed.

Per Permit Number 3557-045-0052-V-04-2, Utility Products Plant re-tasked curing oven 3059-15 (CS-9) from operating only as a curing unit to also preheating wire/cable prior to insulating or stranding activities.

Also per Permit Number 3557-045-0052-V-04-2, Utility Products Plant replaced 15 ink jet printers with new printers, all with identical capacities as the old printers. Each of the replacement ink jet printers will perform the exact function as the removed ink jet printers. Ten of the existing printers (P251, P255, P261, P263, P265, P267, I299, and I294) are permitted without emission limits and associated recordkeeping requirements. However five of the existing permitted printers (P737, P743, P750, P746, and P747) are subject to PSD avoidance limits and associated recordkeeping requirements. Construction and operation of the replacement Printers P737, P743, P750, P746, and P747 under existing PSD avoidance requirements is not required, as it is considered a new modification under 40 CFR 51.165, 40 CFR 52.21, and 40 CFR 52.22. However, Southwire continued to operate the new replacement printers under the more restrictive PSD avoidance limits and perform the associated record keeping requirements as specified for the existing printers although the replacement of the five printers listed above is not a part of the modification that triggered the PSD avoidance limits. Therefore, no permit conditions required modifications as a result of this modification because the new printers will be identified with the same equipment numbers as the existing printers. In addition, the new printers will operate under the same limitations/requirements as the existing printers.

An electric tooling cleaning system (P527) was installed at the Utility Products Plant per Permit Number 3557-045-0052-V-04-2. Tool Cleaning Unit P527 will be used to remove plastic and rubber residue from metal extruder dies and other similar tooling parts. The tooling cleaning unit (Source ID Code: P527) will clean polyethylene-, cross-linked polyethylene-, and other non-halogenated plastic-, and rubber-coated parts only. The Cleaning Unit P527 will not be used to clean residue from any PVC-coated or nylon-coated parts. Equipment P527 has a capacity of approximately 2 pounds of plastic per batch (hour), depending on the parts being cleaned. However, Southwire proposed to limit the unit on a twelve month rolling basis of 4,160 pounds of plastic parts cleaned to restrict the emissions.

Per Permit Number 3557-045-0052-V-04-3, Southwire proposed the use of an alternative insulating compound formulation on CV Lines P501 and P504 (not yet installed) at the Utility Products Plant. The equipment would continue to operate under current limitations imposed during the original permitting of the CV lines. The equipment was originally permitted under PSD and 112g avoidance limits, as well is operating limits to operate three of its four extruders at one time. It is important to note that the alternative formulation will be used on CV Line P501 and P504 only. In addition, the alternative insulating compound formulation will be used in lieu of the current insulating compound formation and will not be used in conjunction with the current insulating compound formation on CV Lines P501 and P504. Therefore, CV Lines P501 and P504 will be operating using the alternative insulating compound formulation *or* the current insulating compound formulation; not the alternative insulating compound formulation *and* the current insulating compound formulation.

Per an email dated April 9, 2014, Mr. Quick indicated that the Paint Booth 205 located at the Utility Products Plant had been decommissioned and removed from the facility. As a result this equipment and all associated permit conditions were modified and/or removed as part of Permit Number 3557-045-0052-V-04-3.

As part of this renewal, the curing ovens CS12, CS13, and CS14 have been removed or were never installed. In addition, the curing process has changed such that the process does not involve steam curing. Therefore, the potential particulate matter emissions resulting from the process are dramatically reduced. Therefore particulate matter emission limitations previously associated with curing are no longer applicable. The process equipment previously known as Curing Ovens CS5, CS6, and CS7 will be referred to preheaters rather than curing ovens as a result of the new operating process.

Boilers P296 and P297 and associated permit conditions have been removed from the permit as part of this renewal since these sources have been permanently decommissioned.

3. Building Wire Plant –

The primary air pollutants from gas oven P154 are hydrochloric acid (HCl) and hydrogen cyanide (HCN). HCl is produced from the decomposition of PVC. HCN is produced from the decomposition of nylon. EPD limited the HCl emissions from P154 for compliance with the Georgia Air Toxics Guideline in Amendment to Permit No. 3357-022-9498, amended October 22, 1998. In addition, EPD limited the operational time of the oven to no more than 14 hours per week. No limit for HCN was determined to be necessary.

As part of this Permit Renewal, P154 has been updated to P154A and P154B to reflect current facility operations of the oven parts cleaning unit.

Permit Number 3357-045-0012-V-01-3 established PM_{10} PSD avoidance limits for the extrusion pellet hopper lines, drawing machines, and storage silos installed at the Southwire Title I Source of 9.9 tons per year. The total PM_{10} limit for the proposed equipment was 14.93 tons per year. The 112(g) avoidance limits were established for methanol emissions (from moisture curing extrusion and moisture-cure curing) and methyl ethyl ketone emissions (from ink-jet printing) located at the Southwire Title V Source to 9.9 tons per year each. Total HAPs emissions were also limited to 24.9 TPY.

In the permit application associated with Permit Number 3357-045-0012-V-01-5, Southwire proposed to modify existing PSD limits to include applicable equipment per modifications at the Utility Products Plant and the Building Wire Plant. Southwire evaluated the net emissions increase of the applicable operations. As a result of the increased utilization analysis, Southwire concluded that PM_{10} and VOC emissions associated with PVC and XLPE Blending above 45,950 tons and 6,500 tons, respectively, needed to be included under the previously requested PM_{10} and VOC emissions limits. Southwire concluded that previously requested 9.9 tons per year PM_{10} limit (covering new drawing, hoppers, and silos) needed to be adjusted to cover all PM_{10} emitting sources included in the September 2004 limit. Southwire also concluded that there was no additional impact to Curing resulting in the potential increase of other PSD/NSR pollutants. Therefore, BWP decided to modify existing PM_{10} PSD avoidance limits to include the proposed raw material storage silo. The Division imposed a PM_{10} emissions limit of 14 tons per 12 consecutive month period. Because PM_{10} emissions are considered a surrogate of $PM_{2.5}$ emissions, the Division imposed a $PM_{2.5}$ emissions limit equivalent to the PM_{10} emissions limit. The Division also imposed a VOC emissions limit of 39 tons per 12 consecutive month period rather than the previously requested VOC emissions limit of 39.9 tons per 12 consecutive month period.

Per Permit Number 3351-045-0012-V-02-1, to demonstrate compliance with the Georgia Toxic Guidelines, Southwire proposed to lower its hydrogen chloride emission limit on gas oven P154 from 5.0 lbs/hr to 3.5 lbs/hr. In addition, Southwire raised the stacks associated with extrusion lines P662, P665, and P672 (permitted but not yet installed) from 35 feet to 40 feet and removed the proposed rain caps. The modifications of proposed stacks, which had yet to be constructed, must be completed prior to startup of the proposed associated equipment.

The Southwire Title I site had existing drawing machines that are capable of processing aluminum and copper. Existing copper processing only drawing machines located at Machine Services Group, Building Wire Plant, and Copper Rod Mill (Drawing Machines P477, P643, P656, P660, P661, P682, and P332) were subject to VOC and $PM_{10}/PM_{2.5}$ PSD avoidance limits. In addition, $PM_{10}/PM_{2.5}$ emissions from these sources were based on Division approved emission factors applicable to copper only drawing/annealing operations. As a result, Drawing Machines P477, P643, P656, P660, P661, P682, and P332 were limited to the processing of only copper per Permit Number 3351-045-0012-V-02-1.

Potential emissions estimates for Drawing Machine P689 were also based on the copper only emission factors. Therefore to ensure that P689 only processes copper, it was included on the existing copper only processing limit of the existing drawing machines listed above per Permit Number 3351-045-0012-V-02-1. However, it is important to note that P689 is not subject to the VOC and $PM_{10}/PM_{2.5}$ PSD avoidance limits also associated with this requirement for Drawing Machines P477, P643, P656, P660, P661, P682, and P332.

Per Permit Number 3351-045-0012-V-02-1, to demonstrate compliance with the Georgia Toxic Guidelines, Southwire proposed to lower its hydrogen chloride emission limit on gas oven P154 from 5.0 lbs/hr to 3.5 lbs/hr. In addition, Southwire raised the stacks associated with extrusion lines P662, P665, and P672 (permitted but not yet installed) from 35 feet to 40 feet and removed the proposed rain caps. The modifications of proposed stacks, which had yet to be constructed, must be completed prior to startup of the proposed associated equipment. Equipment 665 was eventually installed at a different location than proposed (further from the property line). Revised modeling indicates that the 40 foot stack without a raincap is unnecessary, and that P665 can demonstrate compliance with the Georgia Toxic Guidelines as it is currently constructed. Therefore, Southwire wished to remove the stack requirements from Extrusion Line 665 since updating modeling indicates this requirement is no longer applicable.

Per Permit Number 3351-045-0012-V-02-2, to demonstrate compliance with the *Georgia Toxic Guidelines* discussed below, Southwire proposed to process non-PVC coated parts only in Equipment P690. In addition, Southwire proposed to limit P690 to 56 pounds of plastic compound burned off per week, which limits hydrogen cyanide (HCN) emissions from this equipment.

The originally permitted extrusion line JL-5 (Extruders 323, Pellet System P324, and Ink Application System P325) was located at the MC Plant. Per Permit Number 3351-045-0012-V-04-3, the line is now designated a 750-34 and located at the Building Wire Plant. The unit is subject to PSD-avoidance requirements as specified in the permit. However, Southwire proposed to edit the permit to show the updated designation of the line and associated revised condition numbers of the appropriate recordkeeping, monitoring, and reporting requirements.

Per Permit Number 3351-045-0012-V-04-4, Southwire Company proposed to construct and operate a new tooling cleaning unit (P696) at the Building Wire Plant. Southwire requested to limit the operations of the proposed P696 to the same limitations as the existing tooling cleaning unit (P690), and the two units are restricted so that they cannot operate simultaneously.

4. MC Plant and Machine Services Group –

   Per Permit Number 3449-045-0038-V-03-0, the Division imposed a PM_{10} emissions limit of 14 tons per 12 consecutive month period for the proposed modifications. Because PM_{10} emissions were considered a surrogate of $PM_{2.5}$, the Division imposed a $PM_{2.5}$ emissions limit equivalent to the PM_{10} emissions limit. The Division also imposed a VOC emissions limit of 39 tons per 12 consecutive month period rather than the previously requested VOC emissions limit of 39.9 tons per 12 consecutive month period. In addition, the 112(g) avoidance limits were revised to 24 tons per 12 consecutive month period for combined HAPS for reasons discussed above for PM and VOC emission limits. The 112(g) avoidance limits for methanol, a single HAP, remained 9.9 tons per 12 consecutive month period because the emission factor used to estimate methanol emissions is based on source testing.

   Per Permit Number 3357-045-0052-V-02-1, the Division limited emissions of HAP emissions to nine (9) tons per year of any hazardous air pollutant and 24 tons per year of any combination of hazardous air pollutants as a result of the proposed modification. In addition, Southwire took a non-attainment NSR avoidance limit of 39 tons per year for VOC emissions resulting from the proposed modification.

   Per Permit Number 3351-045-0012-V-04-2, Southwire proposed to install and operate an electric parts cleaning unit (P360) and 20 new printers (P361-P380) at the MC Cable Plant. The 20 new printers (P361-P380) will be used to mark armored products. The electric parts cleaning unit P360 will be used remove plastic residue from metal extruder dies and other similar tooling parts. Emissions from this cleaning process are uncontrolled. The capacity of the tooling cleaning unit is approximately one pound of plastic per hour. However, Southwire proposed to limit P360 to 25 pounds of plastic compound burned off per week, which limits emissions from this equipment.

5. Cofer Technology Center –

   Per Permit Number 3351-045-0012-V-04-1, Southwire Company proposed to install and operate a fire test chamber for research and development purposes. Insulated cable will be placed in the test apparatus, subjected to elevated temperatures to simulate conditions during fire, and quenched with a water spray to simulate being doused with a fire hose. Southwire will operate a venturi scrubber to control particulate and organic compound emissions from the test chamber. The test chamber will be located at 840 Old Bremen Road; approximately five (5) miles from the main campus which is located at One Southwire Drive. The test chamber will be operated as part of the Cofer Technology Center located on Southwire's main campus. To comply with the *Georgia Air Toxics Guidelines*, Southwire must install, maintain, and operate a venturi scrubber on the fire test chamber. The scrubber must be maintained per the manufacturer's specifications. In the event that the Division has standard performance specifications, Southwire must meet them. The Division imposed an operating limit on the number of tests conducted in a day (three tests) and the number of tests conducted in a year (1,095 tests).

Equipment P910 operated under a three test batches per 24-hour period operating limitation and a 450 test per rolling twelve month period operating limitation to demonstrate compliance with the Toxics Guidelines discussed later in this document. Per Permit Number 3351-045-0012-V-04-3, Southwire wished to have two operating scenario options as a result of this modification. Southwire proposed, as operating scenario one, to construct new testing units P912 and P913 and duct these sources to the existing Fabric Filter C910. Southwire proposed to install and operate a cone calorimeter (P912) and a cube smoke chamber (P913) to conduct additional burn and smoke tests. Southwire proposed units (P911 and P912) and the existing testing unit (P910). To remain in compliance with the previously demonstrated modeling, Southwire proposed to collectively limit all of the units (P910, P912, and P913) to a three test batches per 24-hour period operating limitation and a 450 test per rolling twelve month period operating limitation. Furthermore, Southwire will not be allowed to operate the units simultaneously. Southwire proposed a second operating scenario which will remove the Fabric Filter C910 and install a Dual Scrubber C912 to control emissions from units P910, P912, and P913. Southwire anticipated the proposed scrubber will have better control efficiency than the existing fabric filter. Therefore, Southwire proposed to increase the operating limits of P910 to five tests per 24-hour period and 1,150 tests per year. In addition, Southwire proposed to limit each of the new units (P912 and P913) to five tests per 24-hour period and 1,150 tests per year. The Division granted this request. However, the 1,150 tests operating limitations will be on a rolling 12 month basis. Southwire proposed to install the new test units (P912 and P913) and duct them as well as existing P910, FT5/MSHA Flame Test (Source Code P914), UL VW-1 Flame Test (Source Code P915), Source Density (Source Code P916), Limited Oxygen Index (Source Code P917), Fire Propagation/PRI (Source Code P918), and High Current Test (Source Code P919) to the Scrubber C912. Once Operating Scenario Two is implemented, Operating Scenario One will become invalid and all applicable permit conditions associated with this operating scenario will become invalid.

In March 2014, Southwire proposed to decommission and replace the Existing Fire Test Chamber P951. The proposed replacement of Test Chamber P951 was necessary to meet the requirements of a new UL (Underwriters Laboratories) test method that requires all applicable sizes or size ranges to be tested along with different conduit sizes. In addition, the UL method requires that the cable be tested in both the vertical and horizontal position. Replacement Test Chamber P951 was being installed to replace the existing unit in order to comply with updated UL standards. It is important to note that Southwire proposed to continue to operate the new Test Chamber P951 under the existing operation limits of the existing Test Chamber P951.

6. Corporate Energy Management –

Per Permit Number 3357-045-0051-V-01-0, NOx emissions from Engine P803 will be limited to 24 grams per horsepower-hour and its operational time will be limited to 956 hours during any twelve consecutive months.

Per Permit Number 3357-045-0051-V-02-2, Southwire requested to limit operating hours of Waukesha Engine P804 to 3,261 hours during any twelve consecutive months. With this operating hours limit, nitrogen oxides and carbon monoxide potential emissions were still above the applicable significant levels for PSD (CO) and NSR (NOx) using emission estimates based on *AP 42, Volume I, Fifth Edition Chapter 3: Stationary Internal Combustion Sources Section 3.2 Natural Gas-fired Reciprocating Engines***.** However, according to Application 19583, emission limits specified in 40 CFR 60 Subpart JJJJ will keep NO_x and CO emissions below significant levels. Therefore, the 40 CFR 60 Subpart JJJJ limits act as 'PSD/NSR avoidance limits'.

Per Permit Number 3357-045-0051-V-02-3, Southwire requested to limit operating hours of Waukesha Engine P804 to 3,261 hours during any twelve consecutive months. With this operating hours limit, nitrogen oxides and carbon monoxide potential emissions are still above the applicable significant levels for PSD (CO) and NSR (NOx) using emission estimates based on *AP 42, Volume I, Fifth Edition Chapter 3: Stationary Internal Combustion Sources Section 3.2 Natural Gas-fired Reciprocating Engines***.** However, according to Application 20070, emission limits specified in 40 CFR 60 Subpart JJJJ will keep NO_x and CO emissions below significant levels. Therefore, the 40 CFR 60 Subpart JJJJ limits act as 'PSD/NSR avoidance limits'.

Since the last renewal Southwire has added emergency engines as insignificant activities discussed in the table in Section I.C. above. As part of this renewal, Southwire is proposing to install a new 11 kilowatt air cooled standby generator, to replace the existing 60 kilowatt emergency generator in CRM. The new generator will perform the same tasks (standby power for the plant's lighting system) as the existing generator and will be assigned the same equipment number as the existing generator. The new generator will be installed in December 2017.

7. Tools and Assembled Products –

   Not Applicable.

Rules and Regulations Assessment:

40 CFR 60 - New Source Performance Standards (NSPS) Subpart A – General Provisions
Except as provided in Subparts B and C of 40 CFR 60, the provisions of this regulation apply to the owner or operator of any stationary source which contains an affected facility, the construction or modification of which is commenced after the date of publication in this part of any standard (or, if earlier, the date of publication of any proposed standard) applicable to that facility [40 CFR 60.1(a)]. Any new or revised standard of performance promulgated pursuant to Section 111(b) of the Clean Air Act applies to equipment located at the Southwire site for which the construction or modification is commenced after the date of publication in 40 CFR 60 of such new or revised standard (or, if earlier, the date of publication of any proposed standard) applicable to that equipment and/or processes [40 CFR 60.1(b)].

40 CFR 63- National Emissions Standards for Hazardous Air Pollutants (NESHAP) Subpart A – General Provisions

This regulation contains national emission standards for hazardous air pollutants (NESHAP) established pursuant to section 112 of the Act as amended November 15, 1990. These standards regulate specific categories of stationary sources that emit (or have the potential to emit) one or more hazardous air pollutants listed in this part pursuant to section 112(b) of the Act. Southwire is a major source of HAPs under this regulation and equipment located at the Southwire site are subject to a specified standard under this regulation.

Georgia Rule 391-3-1-.02(2)(b) – Emission Limitations and Standards – Visible Emissions

Equipment as specified in Table 3.1 are subject to Georgia Rule 391-3-1-.02(2)(b). All emission units which are subject to any emission limitations under 391-3-1-.02(2) are subject to Georgia Rule 391-3-1-.02(2)(b), which limits opacity to less than forty percent, unless they are subject to a more stringent opacity standard.

Georgia Rule 391-3-1-.02(2)(d) – Emission Limitations and Standards – Fuel Burning Equipment

Flame Burners P723 through P734 at the Utility Products Plant are subject to Georgia Rule 391-3-1-.02(2)(d)2.(i) because they are fuel burning sources with a heat input less than 10×10^6 Btu/hr [0.03×10^6 Btu/hr per unit, 0.36×10^6 Btu/hr total] and were constructed after January 1, 1972.

Boiler P911 located at the CTC is subject to Georgia Rule 391-3-1-.02(2)(d)2.(i) because it is a fuel burning source with a heat input less than 10×10^6 Btu/hr [0.42×10^6 Btu/hr] and was constructed after January 1, 1972. Georgia Rule 391-3-1-.02(2)(d)2.(i) limits PM emissions based on the following equation:

P = 0.5 pounds per million Btu heat input

Georgia Rule 391-3-1-.02(2)(d)3.(i) limits opacity from fuel-burning equipment constructed or extensively modified after January 1, 1972 to less than twenty percent except for one six minute period per hour of not more than twenty-seven percent opacity.

Georgia Rule 391-3-1-.02(2)(e) – Emission Limitations and Standards – Particulate Emission from Manufacturing Processes

Equipment as specified in Table 3.1 are subject to Georgia Rule 391-3-1-.02(2)(e)1(i) because it is a source of particulate emissions and will be put into operation or extensively altered after July 2, 1968. Georgia Rule 391-3-1-.02(2)(e)1(i) limits PM emissions based on the following equations:

$E = 4.1P^{0.67}$; for process input weight rate up to and including 30 tons per hour.

$E = 55P^{0.11} - 40$; for process input weight rate greater than 30 tons per hour.

In the equation, E is the emission rate in pounds per hour and P is the process input weight rate in tons per hour.

Georgia Rule 391-3-1-.02(2)(g) – Sulfur Dioxide
Emission units (1) Gas Oven P154 at the Building Wire Plant, (2) Shaft Furnace F409 at the Copper Rod Mill, (3) Vertirod F476 at the Rod Mill, (4) Flame Burners P723 through P734 at the Utility Products Plant, (5) Anneal Furnaces P721 and P523 at the Utility Products Plant, (6) Parts Cleaner P745 at the Utility Products Plant, (7) Testing Chambers and Boiler P911 at the Cofer Technology Center, (8) Waukesha Engines P804, P805, P806, and P807 at the Corporate Energy Facility (9) Diesel-fired backup engines P808, P809, and P813 at the Corporate Energy Center, and (10) Gas-fired backup engines P809, P810, P811, P817 and P818 are subject to Georgia Rule 391-3-1-.02(2)(g)2. which limits the weight sulfur content of fuel fired in sources with a heat input rating less than 100 x 10^6Btu/hr to 2.5 percent or less.

Georgia Rule 391-3-1-.02(2)(n) – Fugitive Dust
This regulation limits emissions from fugitive dust sources. The opacity from Bucket Elevator BE1 at the Copper Rod Mill is limited to twenty (20) percent in accordance with Georgia Rule 391-3-1-.02(2)(n).

Georgia Rule 391-3-1-.02(2)(v) – VOC Emissions from Coil Coating
Georgia Rule 391-3-1-.02(2)(v) is applicable to a coil coating operation which is defined as the coating of any flat metal sheet or strip that comes in rolls or coils. Under this regulation, VOC emissions from coil coating operations shall not exceed 2.6 pounds per gallon of coating, excluding water, delivered to the coating applicator from prime and topcoat or single coat operations. If any coating is delivered to the coating applicator that contains more than 2.6 pounds of VOC per gallon, the solids equivalent limit is 4.02 pounds of VOC per gallon of coating solids delivered to the coating applicator. This limit applies to the coating applicator(s), oven(s) and quench area(s) of coil coating lines involved in prime and topcoat or single coat operations. A quench area as defined by this regulation as a chamber where the hot metal exiting the oven is cooled by either a spray of water or a blast of air followed by water cooling.

Southwire does not propose to install VOC control equipment on UV Ink Application Systems P358 located at Machine Services Group. Therefore, the emission limits can be achieved by the application of low solvent coating technology where each and every coating meets the limit of 2.6 pounds VOC per gallon of coating, excluding water or the application of low solvent coating technology where the 24-hour weighted average of all coatings on a single coating line or operating meets the solids equivalent limit of 4.02 pounds VOC per gallon of coating solids; averaging across lines is not allowed.

Georgia Rule 391-3-1-.02(2)(ii) – VOC Emissions from Surface Coating of Miscellaneous Metal Parts and Products
This regulation is applicable to surface coating of miscellaneous metal parts and products processes that are major sources of VOC emissions. The Paint Booth P001 at the Utility Products Plant and Paint Booth P316 will each have VOC emissions below the major source threshold of 100 tons per year. Therefore this regulation is not applicable to Paint Booth P001 or Paint Booth P316.

Georgia Rule 391-3-1-.02(2)(yy) – Emissions of Nitrogen Oxides from Major Sources
This regulation is applicable to equipment located at a site in Carroll County with potential NO_x emissions from Georgia Rule (yy) activities on a combined basis exceed 100 tons per year. This regulation requires reasonably available control technology in controlling emissions of NO_x.

Utility Products Plant Permit No. 3357-045-0052-V-01-1 limited NOx emissions from the boilers located at the Utility Products Plant to below 100 tons per year for the entire Title I site. This NOx emissions limit was classified as a Georgia Rule 391-3-1-.02(2)(yy) Avoidance Limit. Since the operation of the boilers has ceased this limit is no longer necessary.

Per Georgia Rule 391-3-1-.02(2)(yy)5, this regulation is not applicable to equipment subject to Georgia Rule 391-3-1-.02(2)(mmm). Engines discussed below are subject to Georgia Rule 391-3-1-.02(2)(mmm), therefore, the requirements of Georgia Rule 391-3-1-.02(2)(yy) are not applicable to this equipment.

Georgia Rule 391-3-1-.02(2)(mmm) NO_x Emissions from Stationary Gas Turbines and Stationary Engines used to Generate Electricity
This regulation applies to gas turbines and stationary engines with a nameplate capacity of 100 kilowatts or greater up to 25 megawatts located in the listed counties and specifies NO_x emission limits for such sources. Southwire is located in Carroll County, a listed county. This regulation and its emission limits is applicable to Engines P804, P805, and P806 located at the Corporate Energy facility as they do not meet any emission limit exemptions specified in the rule. This regulation limits NO_x emissions from these engines to not exceed 80 ppm @ 15% O_2, dry basis during the ozone season as they were installed or modified after April 1, 2000.

This regulation and its emission limits are not applicable to stationary engines that meet any emission limit exemptions specified in the rule. This regulation exempts emergency standby stationary engines that meet the definition in *Georgia Rule 391-3-1-.02(2)(mmm)4.(i).* An emergency standby engine is defined in the rule as an engine that operates only when electric power from the local utility is not available and which operates less than 200 hours per year. Engine P807 located at Corporate Energy Management and proposed Engine P813 meet this definition, and therefore are not subject to the emission limits in this rule.

Engines P808, P809, P810, P811, P817, and P818 to be located at Corporate Energy Management each have a nameplate capacity of less than 100 kilowatts. Therefore, this regulation does not apply to these engines.

Georgia Rule 391-3-1-.02(6)(a)4. – Source Monitoring Sources-Emission Statements and Georgia Rule 391-3-1-.02(6)(b)1. – Source Monitoring Sources-General Monitoring and Reporting Requirements
Regulation Georgia Rule 391-3-1-.02(6)(a)4 is applicable to sources of nitrogen oxides and volatile organic compounds located in one of the 20 nonattainment counties which have the potential to emit more than 25 tons per year of either of these pollutants. Georgia Rule 391-3-1-.02(6)(b)1 requires the recordkeeping and reporting of pollutant emissions listed in Georgia Rule 391-3-1-.02(6)(a)4.

Georgia Air Toxics Guidelines Assessment

Toxics Assessment associated with the most recent modifications to the Southwire Title I site are still valid. Modeling of this facility was completed during the issuance of the previous Title V renewal per Permit Number 3351-045-0012-V-04-0. The modeling was updated as applicable for each permit modification since the issuance of the last Title V Permit Renewal.

Per Permit Number 3351-045-0012-V-04-1, the proposed modification at the site could result in potential increases of methanol and formaldehyde and these increases were assessed in accordance with the *Georgia Air Toxics Guideline*. The assessment analyzed the impact from the fire test chamber. Southwire and the Division concluded that model-predicted maximum ground-level concentrations for applicable pollutants at all applicable averaging times were determined to be below the applicable acceptable ambient concentrations and, therefore, within the recommendations specified in the *Georgia Air Toxics Guidelines*.

Per Permit Number 3351-045-0012-V-04-2, construction of the proposed equipment would result in the release of caprolactam, methyl ethyl ketone (MEK), methyl isobutyl ketone (MIBK), hydrogen chloride, methanol, acetophenone, cumene, hydrogen cyanide, formaldehyde, and xylene emissions, and these emissions must be assessed in accordance with the *Georgia Air Toxics Guideline*. The assessment must analyze the impact from the entire Southwire Company – Carrollton Plant site.

Southwire conducted a conservative quantitative assessment of the additive effects for the 24-hour averaging period and 15-minute averaging period using the maximum ground level concentration of each receptor for each of the five modeled years extracted for the four pollutants having a 24-hour concentration and the eight pollutants having a 15-minute concentration. The maximum ground level concentration of each receptor during the five-year period was determined and divided by the respective AAC to determine the maximum MGLC/AAC ration for each pollutant. These were summed for each receptor, and the result indicated that all combined ratios were below 1.0. Consequently, the maximum ground level concentrations are acceptable. Southwire concluded that model-predicted maximum ground-level concentrations for caprolactam, MEK, MIBK, hydrogen chloride, methanol, acetophenone, cumene, hydrogen cyanide, formaldehyde, and xylene at all applicable averaging times were determined to be below the applicable acceptable ambient concentrations and, therefore, within the recommendations specified in the *Georgia Air Toxics Guidelines*.

Per Permit Number 3351-045-0012-V-04-3, construction of the proposed equipment would modify operations at the Cofer Technology Center and the Utility Products Plant. In addition, Southwire was moving one emission unit originally permitted (but never installed) for the Metal Clad (MC) facility to the Building Wire Plant. These modifications resulted in the release of caprolactam, methyl ethyl ketone (MEK), methyl isobutyl ketone (MIBK), methanol, hydrogen cyanide, and hydrogen chloride emissions. In addition, three new pollutants (acetone, tert-butyl alcohol and tert-amyl alcohol) would be emitted, and each of these emissions must be assessed in accordance with the *Georgia Air Toxics Guideline.* The assessment must analyze the impact from the entire Southwire Company – Carrollton Plant site.

Southwire conducted a conservative quantitative assessment of the additive effects for the 24-hour averaging period and 15-minute averaging period using the maximum ground level concentration of each receptor for each of the five modeled years extracted for the five pollutants having a 24-hour concentration and the eight pollutants having a 15-minute concentration. The maximum ground level concentration of each receptor during the five-year period was determined and divided by the respective AAC to determine the maximum MGLC/AAC ration for each pollutant. These were summed for each receptor, and the result indicated that all combined ratios were below 1.0. Consequently, the maximum ground level concentrations are acceptable. Southwire concluded that model-predicted maximum ground-level concentrations for caprolactam, MEK, MIBK, methanol, hydrogen cyanide, hydrogen chloride acetone, tert-butyl alcohol and tert-amyl alcohol emissions at all applicable averaging times were determined to be below the applicable acceptable ambient concentrations and, therefore, within the recommendations specified in the *Georgia Air Toxics Guidelines*.

Per Permit Number 3351-045-0012-V-04-3, the modeling associated with Extruder 665 was updated to reflect the actual location and configuration of the equipment as currently installed. Southwire conducted a conservative quantitative assessment of the additive effects for the 24-hour averaging period and 15-minute averaging period. The maximum ground level concentration of each receptor during the applicable period was determined and divided by the respective AAC to determine the maximum MGLC/AAC ration for each pollutant. These were summed for each receptor, and the result indicated that all combined ratios were below 1.0. Consequently, the maximum ground level concentrations are acceptable. Southwire concluded that model-predicted maximum ground-level concentrations for caprolactam and MEK emissions at all applicable averaging times were determined to be below the applicable acceptable ambient concentrations and, therefore, within the recommendations specified in the Georgia Air Toxics Guidelines.

Per Permit Number 3351-045-0012-V-04-3, the proposed Blade Coating P970 would result in potential increases of ethyl benzene and xylene emissions and these increases must be assessed in accordance with the Georgia Air Toxics Guideline. A toxic impact assessment was performed (TIA) for the proposed blade coating operation. According to an email dated July 24, 2015 from Greenway Environmental, LLC that was forwarded to the Division by Southwire, the proposed stack height for the proposed blade coating is 45 feet. As indicated on the summary of the TIA, toxic hourly emission rates are based on maximum operation of the maximum hourly paint spray rate and worst-case paint. The TIA resulted in the determination that toxics emissions from Blade Coating P790, which will be located at a satellite location approximately five miles away from the main Southwire Company Carrollton campus, will not have an adverse ambient impact at a stack height of 31 feet. Southwire concluded that model-predicted maximum ground-level concentrations for ethyl benzene and xylene emissions at all applicable averaging times were determined to be below the applicable acceptable ambient concentrations and, therefore, within the recommendations specified in the Georgia Air Toxics Guidelines.

1. Copper Rod Mill –

40 CFR 63 NESHAP Subpart B – Requirements for Control Technology Determinations for Major Sources in Accordance With Clean Air Act Sections, Sections 112(g) and 112(j)
Permit Number 3351-045-0008-V-02-3 removed 112(g) avoidance limits for HAP emissions which were established by Permit Number 3351-045-0008-V-02-2 as result of an EPA determination dated June 27, 2006. According to the EPA determination, 112(g) was not believed applicable due to the belief that the proposed production lines produce different products and operate independently of each other and should not be aggregated but accessed individually when evaluating 112(g) applicability [1]. The determination resulted in the removal of all 112g avoidance limits since potential HAP emissions for the new lines are below the major source HAP levels, when accessed individually.

40 CFR 63 NESHAP Subpart C – List of Hazardous Air Pollutants, Petitions Process, Lesser Quantity Designations, Source Category List § 63.61 Deletion of methyl ethyl ketone from the list of hazardous air pollutants.
Methyl ethyl ketone (MEK, 2-Butanone) (CAS Number 78–93–3) was deleted from the list of hazardous air pollutants established by 42 U.S.C. 7412(b)(1) [Federal Register / Vol. 70, No. 242 / Monday, December 19, 2005]. Therefore, limits associated with this chemical are no longer valid.

40 CFR 63 NESHAP Subpart YYYY- Standards for Stationary Combustion Turbines was applicable to the Pratt & Whitney 150 x 10^6 Btu/hr Combustion Turbine (Source ID: T403) as specified in the narrative associated with Permit Number 3351-045-0008-V-02-3. However this rule is no longer applicable since T403 has been removed.

The Bucket Elevator (BE1) located at Copper Rod Mill (CRM) was originally considered an insignificant source and is now considered significant since it is now included in the PSD avoidance limits for PM_{10} and $PM_{2.5}$. As a result, the Bucket Elevator BE1 is now subject to Georgia Rule 391-3-1-.02(2)(n) as specified in the narrative associated with Permit Number 3351-045-0008-V-02-3.

The Vertirod process located at CRM (F476) was also originally considered an insignificant source and is now considered significant since it is now included in the PSD avoidance limits for PM_{10}, $PM_{2.5,}$ and VOC. As a result, the Vertirod process is also now subject to Georgia Rule 391-3-1-.02(2)(e), Georgia Rule 391-3-1-.02(2)(b), 391-3-1-.02(2)(g)(2), and Georgia Rule 391-3-1-.02(2)(tt) as specified in the narrative associated with Permit Number 3351-045-0008-V-02-3.

[1] Applicability of 40 CFR 63, Subpart B to modifications at three Southwire Company facilities Determination Letter dated June 27, 2006, R. Douglas Neeley Chief Air Toxics and Monitoring Branch Air, Pesticides and Toxics Management Division, EPA Region 4

2. Utility Products Plant –

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality [PSD]
The requirements of the PSD regulation apply to a major source as defined by 40 CFR 52.21(b)(1)(i)(a) which emits, or has the potential to emit, 250 tons per year or more of any regulated new source review (NSR) pollutant.

Permit Number 3357-045-0052-V-01-3 established PM_{10} PSD avoidance limits for the extrusion pellet hopper lines, drawing machines, and storage silos installed at the Southwire Title I Source of 9.9 tons per year. The total PM_{10} limit for the proposed equipment was 14.93 tons per year. The 112(g) avoidance limits were established for methanol emissions (from moisture curing extrusion and moisture-cure curing) and methyl ethyl ketone emissions (from ink-jet printing) located at the Southwire Title V Source to 9.9 tons per year each. Total HAPs emissions were also limited to 24.9 TPY. This permit also revoked Permit Number 3357-045-0052-V-01-2.

In the permit application associated with Permit Number 3357-045-0052-V-01-5, Southwire proposed to modify existing PSD limits to include applicable equipment per modifications at the Utility Products Plant and the Building Wire Plant (BWP). Southwire evaluated the net emissions increase of the applicable operations. As a result of the increased utilization analysis, Southwire concluded that PM_{10} and VOC emissions associated with PVC and XLPE Blending above 45,950 tons and 6,500 tons, respectively, needed to be included under the previously requested PM_{10} and VOC emissions limits. Southwire concluded that previously requested 9.9 tons per year PM_{10} limit (covering new drawing, hoppers, and silos) needed to be adjusted to cover all PM_{10} emitting sources included in the September 2004 limit. Southwire also concluded that there was no additional impact to curing resulting in the potential increase of other PSD/NSR pollutants. Therefore, Southwire decided to modify existing PM_{10} PSD avoidance limits to include the proposed equipment. The Division imposed a PM_{10} emissions limit of 14 tons per 12 consecutive month period. Because PM_{10} emissions are considered a surrogate of $PM_{2.5}$ emissions as discussed above, the Division imposed a $PM_{2.5}$ emissions limit equivalent to the PM_{10} emissions limit. The Division also imposed a VOC emissions limit of 39 tons per 12 consecutive month period rather than the previously requested VOC emissions limit of 39.9 tons per 12 consecutive month period.

40 CFR 60 NSPS Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
This regulation is applicable to the proposed auxiliary boiler since the regulation applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British Thermal Units per hour) or less, but greater than or equal to 2.9 MW (10 million British Thermal Units per hour) [40 CFR 60.40c(a)]. The flame burners are not subject to this regulation since each has an input capacity less than 10 million British Thermal Units per hour.

40 CFR 63 NESHAP Subpart B – Requirements for Control Technology Determinations for Major Sources in Accordance With Clean Air Act Sections, Sections 112(g) and 112(j)
Permit Number 3357-045-0052-V-01-5 removed 112(g) avoidance limits for HAP emissions which were established by Permit Number 3357-045-0052-V-01-3 as result of an EPA determination dated June 27, 2006. According to the EPA determination, 112(g) was not believed applicable due to the belief that the proposed production lines produce different products and operate independently of each other and should not be aggregated but accessed individually when evaluating 112(g) applicability [2]. The determination resulted in the removal of all 112g avoidance limits since potential HAP emissions for the new lines are below the major source HAP levels, when accessed individually.

40 CFR 63 NESHAP Subpart C – List of Hazardous Air Pollutants, Petitions Process, Lesser Quantity Designations, Source Category List § 63.61 Deletion of methyl ethyl ketone from the list of hazardous air pollutants.
Methyl ethyl ketone (MEK, 2-Butanone) (CAS Number 78–93–3) was deleted from the list of hazardous air pollutants established by 42 U.S.C. 7412(b)(1) [Federal Register / Vol. 70, No. 242 / Monday, December 19, 2005]. Therefore, limits associated with this chemical are no longer valid.

40 CFR 63 NESHAP Subpart MMMM – Standards for Surface Coating of Miscellaneous Metal Parts and Products
This regulation establishes national emission standards for hazardous air pollutants (NESHAP) for miscellaneous metal parts and products surface coating facilities. It also establishes requirements to demonstrate initial and continuous compliance with the emission limitations [40 CFR 63.3880]. This regulation applies to the surface coating of any miscellaneous metal parts or products, as described in 40 CFR 63.3881(a)(1), and it includes the subcategories listed in 40 CFR 63.3881(a)(2) through (6), except as provided in 40 CFR 63.3881(c) and that is a major source, is located at a major source, or is part of a major source of emissions of HAP. Southwire is a major source of HAPs.

Southwire uses Paint Booth P001 to paint cable reels in support of Southwire operations at the UPP and the Forte Power Systems facility in Heflin, Alabama. Per 40 CFR 63.3881(c)(2), surface coating operations that occur at research or laboratory facilities, or is part of janitorial, building, and facility maintenance operations, or that occur at hobby shops that are operated for noncommercial purposes are not subject to 40 CFR 63, Subpart MMMM. Coatings used in volumes of less than 189 liters (50 gal) per year, provided that the total volume of coatings exempt under 40 CFR 63.3381(c)(3) does not exceed 946 liters (250 gal) per year at the facility are also not subject to 40 CFR 63, Subpart MMMM. However, Southwire wishes to maintain the flexibility to use a HAP-containing coating for non-exempt painting operations on Paint Booth P001. Therefore, Paint Booth P001 is subject to 40 CFR 63, Subpart MMMM.

[2] Applicability of 40 CFR 63, Subpart B to modifications at three Southwire Company facilities Determination Letter dated June 27, 2006, R. Douglas Neeley Chief Air Toxics and Monitoring Branch Air, Pesticides and Toxics Management Division, EPA Region 4

An affected source is a new affected source if you commenced its construction after August 13, 2002 and the construction is of a completely new miscellaneous metal parts and products surface coating facility where previously no miscellaneous metal parts and products surface coating facility had existed [40 CFR 63.3882(c)]. Paint Booth P001 is located at the satellite location and was constructed after 2002. Therefore, it is considered a new affected source. A source is the collection of all of the items listed as follows that are used for surface coating of miscellaneous metal parts and products within each subcategory (1) All coating operations as defined in 40 CFR 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)(1) through (b)(4)]. Therefore all applicable limits will apply to Paint Booth P001 and associated equipment as described in 40 CFR 63.3882(b)(1) through (b)(4).

New or reconstructed affected sources, must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in 40 CFR 63.3890(a)(1) through (5), except as specified in 40 CFR 63.3890(c), determined according to the requirements in 40 CFR 63.3941[Compliant Material Option] or 40 CFR 63.3951 [Emission Rate without Add-On Controls Option]. Since Southwire does not propose to install add-on control options as defined in 40 CFR 63.3981, there is no need to discuss the Emission Rate with Add-On Controls Option as specified in 40 CFR 63.3961. Southwire can comply with this limit by one of the alternatives in 40 CFR 63.3890(c)(1) [Predominant Activity Emission Limit] or 40 CFR 63.3890(c)(2) [Facility-Specific Emission Limit].

Southwire proposes to use primarily a water-based black paint and a solvent-based high-temperature silver paint. In an email dated February 11, 2011, Southwire personnel noted that the high-temperature silver paint proposed withstands a temperature much less than that of a *high temperature coating* which is defined in 40 CFR 63.3981 as any coating applied to a substrate which during normal use must withstand temperatures of at least 538 degrees Celsius (1000 degrees Fahrenheit). Therefore, coating processes associated with P001 will meet the general use definition in 40 CFR 63.3981. *General use coating* means any material that meets the definition of coating but does not meet the definition of high performance coating, rubber-to-metal coating, magnet wire coating, or extreme performance fluoropolymer coating as defined in 40 CFR 63.3981. For each new general use coating affected source, organic HAP emissions are limited to no more than 1.9 pound (lb) organic HAP per gallon (gal) coating solids used during each 12-month compliance period [40 CFR 63.3890(a)(1)]. Paint Booth P001 must also comply with 40 CFR 63, Subpart A – General Provision as specified in Table 2 of 40 CFR 63, Subpart MMMM [40 CFR 63.3901].

No operating limits (40 CFR 63.3892(a) or 40 CFR 63.3893(a)) are applicable because Paint Booth P001 will not be equipped with add-on controls as defined in 40 CFR 63.3981.

40 CFR 63 NESHAP Subpart DDDDD- Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters
Boilers P296 and P297 have been permanently decommissioned. As a result, the Division removed the applicability of this regulation to Boilers P296 and P297 by deleting all applicable permit conditions.

3. Building Wire Plant –

40 CFR 63 NESHAP Subpart B – Requirements for Control Technology Determinations for Major Sources in Accordance With Clean Air Act Sections, Sections 112(g) and 112(j)
Permit Number 3357-045-0012-V-01-5 removed 112(g) avoidance limits for HAP emissions which were established by Permit Number 3357-045-0052-V-01-3 as result of an EPA determination dated June 27, 2006. According to the EPA determination, 112(g) was not believed applicable due to the belief that the proposed production lines produce different products and operate independently of each other and should not be aggregated but accessed individually when evaluating 112(g) applicability [3]. The determination resulted in the removal of all 112g avoidance limits since potential HAP emissions for the new lines are below the major source HAP levels, when accessed individually.

40 CFR 63 NESHAP Subpart C – List of Hazardous Air Pollutants, Petitions Process, Lesser Quantity Designations, Source Category List § 63.61 Deletion of methyl ethyl ketone from the list of hazardous air pollutants.
Methyl ethyl ketone (MEK, 2-Butanone) (CAS Number 78–93–3) was deleted from the list of hazardous air pollutants established by 42 U.S.C. 7412(b)(1) [Federal Register / Vol. 70, No. 242 / Monday, December 19, 2005]. Therefore, limits associated with this chemical are no longer valid.

4. MC Plant and Machine Services Group –

40 CFR 60 NSPS Subpart TT- Standards for Metal Coil Surface Coating
This regulation applies to the following affected facilities in a metal coil surface coating operation that commenced construction, modification, or reconstruction after January 5, 1981: each prime coat operation, each finish coat operation, and each prime and finish coat operation combined when the finish coat is applied wet on wet over the prime coat and both coatings are cured simultaneously [40 CFR 60.460(a) and (b)]. The affected facilities are defined in 40 CFR 60.461. Under this regulation, sources which do not use an emission control device cannot emit more than 0.28 kilogram VOC per liter (kg VOC/l) of coating solids applied for each calendar month. [40 CFR 60.462(a)(1)].

[3] Applicability of 40 CFR 63, Subpart B to modifications at three Southwire Company facilities Determination Letter dated June 27, 2006, R. Douglas Neeley Chief Air Toxics and Monitoring Branch Air, Pesticides and Toxics Management Division, EPA Region 4

40 CFR 63 NESHAP Subpart MMMM – Standards for Surface Coating of Miscellaneous Metal Parts and Products

This regulation establishes national emission standards for hazardous air pollutants (NESHAP) for miscellaneous metal parts and products surface coating facilities. It also establishes requirements to demonstrate initial and continuous compliance with the emission limitations [40 CFR 63.3880]. This regulation applies to the surface coating of any miscellaneous metal parts or products, as described in 40 CFR 63.3881(a)(1), and it includes the subcategories listed in 40 CFR 63.3881(a)(2) through (6), except as provided in 40 CFR 63.3881(c) and that is a major source, is located at a major source, or is part of a major source of emissions of HAP. Southwire is a major source of HAPs.

In a letter dated July 9, 2010, Southwire submitted initial notification of the existing Paint Booth P316 becoming subject to this regulation effective July 12, 2011. Prior to this, P316 had been used for facility maintenance purposes. However, Southwire proposed to expand the use of the booth to include commercial products. The booth was not physically modified.

Per 40 CFR 63.3881(c)(2), surface coating operations that occur at research or laboratory facilities, or is part of janitorial, building, and facility maintenance operations, or that occur at hobby shops that are operated for noncommercial purposes are not subject to 40 CFR 63, Subpart MMMM. Coatings used in volumes of less than 189 liters (50 gal) per year, provided that the total volume of coatings exempt under 40 CFR 63.3381(c)(3) does not exceed 946 liters (250 gal) per year at the facility are also not subject to 40 CFR 63, Subpart MMMM. However, Southwire wishes to obtain the flexibility to use a HAP-containing coating for non-exempt painting operations on Paint Booth P316. Therefore, Paint Booth P316 is subject to 40 CFR 63, Subpart MMMM.

An affected source is a new affected source if you commenced its construction after August 13, 2002 and the construction is of a completely new miscellaneous metal parts and products surface coating facility where previously no miscellaneous metal parts and products surface coating facility had existed [40 CFR 63.3882(c)]. An affected source is reconstructed if it meets the criteria as defined in 40 CFR 63.2 [40 CFR 63.3882(d)]. An affected source is existing if it is not new or reconstructed [40 CFR 63.3882(e)]. According to Application 19901, Paint Booth 316 was constructed and installed in 1998. It is located at the Machine Services Group facility which has other metal coating activities. Therefore, it is considered an existing affected source. A source is the collection of all of the items listed as follows that are used for surface coating of miscellaneous metal parts and products within each subcategory (1) All coating operations as defined in 40 CFR 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)(1) through (b)(4)]. Therefore all applicable limits will apply to Paint Booth P316 and associated equipment as described in 40 CFR 63.3882(b)(1) through (b)(4).

An existing source, must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in 40 CFR 63.3890(b)(1) through (5), except as specified in 40 CFR 63.3890(c), determined according to the requirements in 40 CFR 63.3941[Compliant Material Option] or 40 CFR 63.3951 [Emission Rate without Add-On Controls Option]. Since Southwire does not propose to install add-on control options as defined in 40 CFR 63.3981, there is no need to discuss the Emission Rate with Add-On Controls Option as specified in 40 CFR 63.3961. Southwire can comply with this limit by one of the alternatives in 40 CFR 63.3890(c)(1) [Predominant Activity Emission Limit] or 40 CFR 63.3890(c)(2) [Facility-Specific Emission Limit].

Coating processes associated with P316 will meet the general use definition in 40 CFR 63.3981. *General use coating* means any material that meets the definition of coating but does not meet the definition of high performance coating, rubber-to-metal coating, magnet wire coating, or extreme performance fluoropolymer coating as defined in 40 CFR 63.3981. For each existing general use coating affected source, organic HAP emissions are limited to no more than 2.6 pound (lb) organic HAP per gallon (gal) coating solids used during each 12-month compliance period [40 CFR 63.3890(b)(1)]. Paint Booth P316 must also comply with 40 CFR 63, Subpart A – General Provision as specified in Table 2 of 40 CFR 63, Subpart MMMM [40 CFR 63.3901].

No operating limits (40 CFR 63.3892(a) or 40 CFR 63.3893(a)) are applicable because Paint Booth P316 will not be equipped with add-on controls as defined in 40 CFR 63.3981.

An affected source is existing if it is not new or reconstructed [40 CFR 63.3882(e)]. Printers P361-P380 were to be constructed and installed in September 2013. They are located at the MC Plant which has other metal coating activities. Therefore, it is considered an existing affected source. As a result, initial notification and notification of compliance status requirements specified in 40 CFR 63.383(d), 40 CFR 63.3910(a) and 40 CFR 63.3910(c) are deemed to have been met. Southwire will demonstrate the compliance status of Printers P361-P380 during its scheduled semiannual NESHAP compliance status reports. Therefore permit conditions pertaining to initial notification requirements were removed from the permit.

Per an email dated April 9, 2014, Mr. Quick indicated that the Paint Booth 205 located at the Utility Products Plant Has been decommissioned and removed from the facility. As a result this equipment and all associated permit conditions were modified and/or removed.

40 CFR 63 NESHAP Subpart SSSS- Standards for Surface Coating of Metal Coil
This regulation applies to each facility that is a major source of HAP, as defined in §63.2, at which a coil coating line is operated, except as provided in 40 CFR 63.5090(b) [40 CFR 63.5090(a)]. The affected source subject to this regulation is the collection of all the coil coating lines at Southwire [40 CFR 63.5100]. A coil coating line means a process and the collection of equipment used to apply an organic coating to the surface of metal coil and includes a web unwind or feed section, a series of one or more work stations, any associated curing oven, wet section, and quench station as defined in 40 CFR 63.5110. A coil coating line does not include ancillary operations such as mixing/thinning, cleaning, wastewater treatment, and storage of coating material [40 CFR 63.5510]. The proposed UV-cured ink application operation would be considered a new source since it will be constructed after July 18, 2000 and must be in compliance with the regulation upon startup [40 CFR 63.5130(b)].

The initial compliance period begins upon startup and ends on the last day of the 12th month following the compliance date. If the compliance date falls on any day other than the first day of the month, then the initial compliance period extends through the month plus the next 12 months [40 CFR 63.5130(d)]. When demonstrating continuous compliance, a compliance period consists of 12 months. Each month after the end of the initial compliance period as defined in 40 CFR 63.513(d) is the end of a compliance period consisting of that month and the preceding 11 months [40 CFR 63.5130(e)]. Table 2 of 40 CFR 63, Subpart SSSS lists the general provisions in 40 CR 63 Subpart A which are applicable to the UV-cured ink application process [40 CFR 63.5140(b) and Table 2 of 40 CFR 63, Subpart SSSS].

5. Cofer Technology Center –

40 CFR 60 NSPS Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
This regulation is applicable to the proposed auxiliary boiler since the regulation applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British Thermal Units per hour) or less, but greater than or equal to 2.9 MW (10 million British Thermal Units per hour) [40 CFR 60.40c(a)]. Boiler P911, constructed in 1992, is not subject to this regulation since is has an input capacity less than 10 million British Thermal Units per hour.

40 CFR 63 NESHAP Subpart DDDDD – Standards for Industrial, Commercial, and Institutional Boilers and Process Heaters
This source was previously listed in insignificant activities. However, due to the applicability of 40 CFR 63, Subpart DDDDD, it is now considered a significant source. Therefore, Permit Number 3357-045-0008-V-04-0 was modified to include a general applicability condition to address applicability of the rule to Boiler P911 and update its significance status. The permit was later modified to add specific requirements discussed later in this document.

6. Corporate Energy Management –

40 CFR 60 NSPS Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

This regulation is applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (3) of § 60.4200. For the purposes of this regulation, the date that construction commences is the date the engine is ordered by Southwire [40 CFR 62.4200(a)]. Southwire must operate and maintain generator P807 that achieves the emission standards as required in 40 CFR 60.4204 and 60.4205 according to the manufacturer's written instructions or procedures developed by Southwire that are approved by the engine manufacturer, over the entire life of the engine [40 CFR 60.4206].

Southwire proposed to use diesel fuel in the proposed generator engine. Southwire must use diesel fuel that meets the requirements of 40 CFR 80.510(a) [40 CFR 60.4207(a)]. Beginning October 1, 2010, stationary CI ICE subject to 40 CFR 60, Subpart IIII with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel [40 CFR 60.4207(b)].

Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. Southwire may petition the Division for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if Southwire maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. For owners and operators of emergency engines meeting standards under 40 CFR 60.4205 but not 40 CFR 60.4204, any operation other than emergency operation, and maintenance and testing as permitted in this section, is prohibited [40 CFR 60.4211(e)].

40 CFR 60 NSPS Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

This regulation is applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in 40 CFR 60.4230 (a)(1) through (5). Owners and operators of stationary SI ICE that commence modification or reconstruction after June 12, 2006 are subject to this regulation [40 CFR 60.4230(a)(5)]. According to Application 19583, Equipment P804 was reconstructed on June 4, 2009. According to Application 20070, Waukesha Engines P805 and P806 were reconstructed after June 12, 2006. Therefore, they are subject to this regulation. Owners and operators of stationary SI ICE must operate and maintain stationary SI ICE that achieve the emission standards as required in 40 CFR 60.4233 over the entire life of the engine [40 CFR 60.4234]. Owners and operators of stationary SI ICE that have been modified or reconstructed are not subject to the specified deadline for importing or installing stationary SI ICE produced in the previous model year as specified in 40 CFR 60.4236, and they do not apply to engines that were removed from one existing location and reinstalled at a new location [40 CFR 60.4236(e)].

Owners and operators of stationary SI natural gas and lean burn LPG engines with a maximum engine power greater than 19 KW (25 HP), that are modified or reconstructed after June 12, 2006, must comply with the same emission standards as those specified in 40 CFR 60.4233 (d) or (e), except as specified in 40 CFR 60.4233(f)(4). Equipment P804, P805, and P806 are rich burn natural gas fired engines. The engines are also not certified as defined in 40 CFR 60, Subpart JJJJ. Per 40 CFR 60.4233(e), Equipment P804 P805, and P806 must comply with the emission limits in Table 1 to 40 CFR 60, Subpart JJJJ. The following emission limits apply to Equipment P804, P805, and P806:

- 2.0 g/HP-hr NO_x emissions, 4.0 g/HP-hr CO emissions, and 1.0 g/HP-hr VOC emissions; or
- 160 ppmv NO_x emissions at 15% O_2 on a dry basis, 540 ppmv CO emissions at 15% O_2 on a dry basis, and 86 ppmv VOC emissions at 15% O_2 on a dry basis.

40 CFR 63 NESHAP Subpart ZZZZ – Standards for Stationary Reciprocating Internal Combustion Engines (RICE)

This regulation is applicable to RICEs that are located at a major source of hazardous air pollutants (HAPs) [40 CFR 63.6585]. The regulation defines *a reconstructed stationary RICE, as* a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, is reconstructed if it meets the definition of reconstruction in 40 CFR 63.2 and reconstruction is commenced on or after December 19, 2002. [40 CFR 63.6590(a)(3)(i)]. According to Application 19583, Waukesha Engine P804 was reconstructed in June 2009. According to Application 20070, Waukesha Engines P805 and P806 were reconstructed after June 12, 2006. Therefore, these units are classified as reconstructed RICE.

An existing, new, or reconstructed spark ignition 4 stroke rich burn (4SRB) stationary RICE located at a major source of HAP emissions, must comply with the emission limitations in Table 1a of 40 CFR 63, Subpart ZZZZ and the operating limitations in Table 1b of 40 CFR 63, Subpart ZZZZ which apply [40 CFR 63.6660(a)]. The Waukesha Engines are equipped with Non-Selective Catalytic Reduction (NSCR) systems to control NO_x emissions. Therefore the engines are subject to either of one of two emission limits which are (1) reduce formaldehyde emissions from Waukesha Engines P804, P805, and P806 by 76 percent or more; or (2) limit the concentration of formaldehyde in the stationary exhaust of Waukesha Engines P804, P805, and P806 to 350 parts per billon by volume on a dry basis (ppbvd) or less corrected to fifteen percent oxygen (O_2). The operating limits applicable to the engine are: (1) to maintain the catalyst of the NSCR System so that the pressure drop across the catalyst does not change by more than two inches of water at 100 percent load plus or minus 10 percent from the pressure drop across the catalyst measured during the initial performance test; and (2) to maintain the temperature of the stationary exhaust from Waukesha Engines P804, P805, and P806 so that the catalyst inlet temperature is greater than or equal to 750 degrees Fahrenheit (°F) and less than or equal to 1250 °F [40 CFR 63.6600(a) and Tables 1a and 1b of 40 CFR 63, Subpart ZZZZ].

In the event the manufacturer of the Waukesha Engines has performed testing in accordance with 40 CFR 63.6610 (d), initial performance testing by facility is not required.

Emergency stationary RICE means any stationary RICE whose operation is limited to emergency situations and required testing and maintenance. Examples include stationary RICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary RICE used to pump water in the case of fire or flood, etc. Stationary RICE used for peak shaving are not considered emergency stationary RICE. Stationary ICE used to supply power to an electric grid or that supply power as part of a financial arrangement with another entity are not considered to be emergency engines [40 CFR 63.6675].

The regulation further stipulates that emergency stationary RICE with a site-rating of more than 500 brake Hp located at a major source of HAP emissions that were installed on or after June 12, 2006, must comply with requirements specified in 40 CFR 63.6640(f) [40 CFR 63.6675]. According to 40 CFR 63.6644(f), an emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year. Emergency stationary ICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity. For owners and operators of emergency engines, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in this section, is prohibited.

The emergency generator P807 meets the definition of an emergency stationary RICE. An existing 2SLB stationary RICE, an existing 4SLB stationary RICE, or an existing CI stationary RICE; a stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis; an emergency stationary RICE; or a limited use stationary RICE, are not required to comply with the emission limitations in Tables 1a and 2a of 40 CFR 63, Subpart ZZZZ or operating limitations in Tables 1b and 2b of 40 CFR 63, Subpart ZZZZ [40 CFR 63.6600(c)].

The emergency generator P807 has a site rating of more than 500 brake Hp, and is located at a major source of HAP emissions. Therefore, Southwire must complete initial notification requirements of 40 CFR 63.6645(h) [40 CFR 63.6590(b)(1)(i)].

Engines P808 through P812 meet the definition of an emergency stationary RICE. Existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions, must comply with the emission limitations in Table 2c to this subpart which apply to you. Compliance with the numerical emission limitations established in this subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in 40 CFR 63.6620 and Table 4 to 40 CFR 63, Subpart ZZZZ [40 CFR 63.6602]. According to Application 19901 these engines were constructed prior to 2001. Engines P808 and P809 are compression ignition (CI) engines. Engines P810 though P812 are considered spark ignition (SI) engines. Therefore, these engines will be required to meet applicable requirements for the specific engine type specified in Table 2c.

Storm water generator P813 meets the definition of an emergency stationary RICE. An existing emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions does not have to meet the requirements of 40 CFR 63 Subparts A or ZZZZ, including initial notification requirements [40 CFR 63.6590(b)(3)(i)].

7. Tools and Assembled Products –

40 CFR 63 NESHAP Subpart MMMM – Standards for Surface Coating of Miscellaneous Metal Parts and Products
Southwire proposed to install a blade coating operation (Source Code: P970) at its existing Bremen Road facility to paint small tool blades. Therefore, Blade Coating P970 is subject to 40 CFR 63, Subpart MMMM.

An affected source is a new affected source if you commenced its construction after August 13, 2002 and the construction is of a completely new miscellaneous metal parts and products surface coating facility where previously no miscellaneous metal parts and products surface coating facility had existed [40 CFR 63.3882(c)]. Blade Coating P970 is located at the satellite location and was constructed in 2015. Therefore, it is considered a new affected source. A source is the collection of all of the items listed as follows that are used for surface coating of miscellaneous metal parts and products within each subcategory (1) All coating operations as defined in 40 CFR 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)(1) through (b)(4)]. Therefore all applicable limits apply to Blade Coating P970 and associated equipment as described in 40 CFR 63.3882(b)(1) through (b)(4).

New or reconstructed affected sources must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in 40 CFR 63.3890(a)(1) through (5), except as specified in 40 CFR 63.3890(c), determined according to the requirements in 40 CFR 63.3941[Compliant Material Option] or 40 CFR 63.3951 [Emission Rate without Add-On Controls Option]. Since Southwire does not propose to install add-on control options as defined in 40 CFR 3981, there is no need to discuss the Emission Rate with Add-On Controls Option as specified in 40 CFR 63.3961. Southwire can comply with this limit by one of the alternatives in 40 CFR 63.3890(c)(1) [Predominant Activity Emission Limit] or 40 CFR 63.3890(c)(2) [Facility-Specific Emission Limit].

Based on the information provided in Application Number 23336, coating processes associated with P970 met the general use definition in 40 CFR 63.3981. General use coating means any material that meets the definition of coating but does not meet the definition of high performance coating, rubber-to-metal coating, magnet wire coating, or extreme performance fluoropolymer coating as defined in 40 CFR 63.3981. For each new general use coating affected source, organic HAP emissions are limited to no more than 1.9 pound (lb) organic HAP per gallon (gal) coating solids used during each 12-month compliance period [40 CFR 63.3890(a)(1)]. Blade Coating P970 must also comply with 40 CFR 63, Subpart A – General Provision as specified in Table 2 of 40 CFR 63, Subpart MMMM [40 CFR 63.3901].

No operating limits (40 CFR 63.3892(a) or 40 CFR 63.3893(a)) are applicable because Blade Coating P970 is not equipped with add-on controls as defined in 40 CFR 63.3981.

C. Permit Conditions

The table below summarizes the conditions in Section 3.0.

Permit Condition in Permit Number 3357-045-0008-V-05-0	Permit Condition Number in Permit Number 3357-045-0008-V-04-0	Permit Condition Deleted, Modified or Added since issuance of Permit Number 3357-045-0008-V-04-0	Deleted Modified or Added per what Permit Number 3357-045-0008-V-04-0	Explanation of Permit Condition
Section 3.2A – Equipment Emission Caps and Operating Limits [MULTI]				
3.2.A.1	3.2.A.1	No	-	Permit condition specifies PM_{10} emission limitations for PSD avoidance for multiple equipment.
3.2.A.2	3.2.A.2	Yes	Modified per 3357-045-0008-V-05-0.	Permit condition specifies VOC emission limitations for PSD avoidance for multiple equipment. This condition was modified as part of this renewal to remove the curing ovens as discussed above.

3.2.A.3	3.2.A.3	No	-	Permit condition specifies $PM_{2.5}$ emission limitations for PSD avoidance for multiple equipment.
Section 3.3.A – Equipment Federal Rule Standards [MULTI]				
-				
Section 3.4.A – Equipment SIP Rule Standards [MULTI]				
-				
Section 3.5.A – Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit [MULTI]				
-				
Section 3.2B – Equipment Emission Caps and Operating Limits [BWP]				
3.2.B.1	3.2.B.1	Yes	Modified per 3357-045-0008-V-05-0.	This condition limits the operation and types of materials processed in the Parts Oven (P154A) and Tooling Cleaner (P154B). This condition was modified as part of this renewal to rename the equipment, separating the parts oven and tooling cleaner to reflect current facility operations.
3.2.B.2	3.2.B.2	Yes	Modified per 3357-045-0008-V-05-0.	This condition limits the hydrogen chloride (HCl) emissions from the Parts Oven (P154A) and Tooling Cleaner (P154B), This condition was modified as part of this renewal to rename the equipment, separating the parts oven and tooling cleaner to reflect current facility operations.
3.2.B.3	3.2.B.3	No	-	This condition limits metal processed in applicable drawing machines.
3.2.B.4	3.2.B.4	Yes	Modified per 3357-045-0008-V-04-4.	This condition limits the types of materials processed in the applicable tool cleaning machines. This condition was modified to add new equipment as discussed above.

3.2.B.5	3.2.B.5	Yes	Modified per 3357-045-0008-V-04-4.	This condition limits the amount of materials processed in the applicable tool cleaning machines. This condition was modified to add new equipment as discussed above.
Section 3.3.B – Equipment Federal Rule Standards [BWP]				
-				
Section 3.4.B – Equipment SIP Rule Standards [BWP]				
3.4.B.1	3.4.B.1	No	-	This condition specifies Georgia Rule (e) PM limitations.
3.4.B.2	3.4.B.2	No	-	This condition specifies Georgia Rule (b) opacity limitations.
3.4.B.3	3.4.B.3	No	-	This condition specifies Georgia Rule (g) fuel sulfur content limitations.
Section 3.5.B – Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit [BWP]				
3.5.B.1	3.5.B.1	Yes	Modified per 3357-045-0008-V-04-4.	This condition specifies the stack parameters to demonstrate compliance with the Georgia Toxic Guidelines for applicable equipment. This condition was modified to reflect updated modeling and equipment requirements discussed above.
Section 3.2C – Equipment Emission Caps and Operating Limits [MC]				
3.2.C.1	3.2.C.1	No	-	This condition limits the material processed in Drawing Machine P332.
3.2.C.2	-	Yes	Added per 3357-045-0008-V-04-2.	This condition limits the amount of material burned off using Parts Cleaning Unit P360.
Section 3.3.C – Equipment Federal Rule Standards [MC]				
3.3.C.1	3.3.C.1	No	-	This condition specifies applicability of 40 CFR 60, Subpart TT.
3.3.C.2	3.3.C.2	No	-	This condition specifies applicability of 40 CFR 63, Subpart SSSS.

3.3.C.3	3.3.C.3	No	-	This condition limits VOC emissions from P358 per 40 CFR 60, Subpart TT.
3.3.C.4	3.3.C.4	No	-	This condition limits HAP emissions from P358 per 40 CFR 63, Subpart SSSS.
3.3.C.5	-	Yes	Added per 3357-045-0008-V-04-2.	This condition limits HAPs emission from Printers P361-P380 per 40 CFR 63, Subpart MMMM.
3.3.C.6	-	Yes	Added per 3357-045-0008-V-04-2.	This condition specifies compliance options for Printers P361-P380 per 40 CFR 63, Subpart MMMM.
3.3.C.7	-	Yes	Added per 3357-045-0008-V-04-2.	This condition specifies applicability of 40 CFR 63, Subpart MMMM to Printers P361-P380.
3.3.C.8	-	Yes	Added per 3357-045-0008-V-04-2.	This condition specifies predominant activity applicability of 40 CFR 63, Subpart MMMM to Printers P361-P380.
3.3.C.9	-	Yes	Added per 3357-045-0008-V-04-2.	This condition specifies facility specific limit per 40 CFR 63,Supbart MMMM.
Section 3.4.C – Equipment SIP Rule Standards [MC]				
3.4.C.1	3.4.C.1	No	-	This condition specifies Georgia Rule (e) PM limitations.
3.4.C.2	3.4.C.2	No	-	This condition specifies Georgia Rule (b) opacity limitations.
3.4.C.3	3.4.C.3	No	-	This condition specifies Georgia Rule (v) coatings VOC emissions limitations.
3.4.C.4	3.4.C.4	No	-	This condition specifies Georgia Rule (v) low solvent coating VOC emissions.
3.4.C.5	-	Yes	Added per 3357-045-0008-V-04-2.	This condition specifies VOC RACT for Printers P361-P380.
3.4.C.6	-	Yes	Added per 3357-045-0008-V-04-2.	This condition limits VOC emissions per VOC RACT for Printers P361-P380.

Section 3.5.C – Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit [MC]				
-				
Section 3.2.D – Equipment Emission Caps and Operating Limits [CRM]				
3.2.D.1	3.2.D.1	No	-	This PSD avoidance limit specifies VOC limits for applicable equipment.
3.2.D.2	3.2.D.2	No	-	This condition limits the material processed in Drawing Machine P477.
Section 3.3.D – Equipment Federal Rule Standards [CRM]				
-				
Section 3.4.D – Equipment SIP Rule Standards [CRM]				
3.4.D.1	3.4.D.1	No	-	This condition specifies requirements of Georgia Rule (e).
3.4.D.2	3.4.D.2	No	-	This condition specifies requirements of Georgia Rule (b).
3.4.D.3	3.4.D.3	No	-	This condition specifies fuel sulfur content requirements of Georgia Rule (g).
3.4.D.4	3.4.D.4	No	-	This condition specifies operation requirements of Georgia Rule (tt) for Q467.
3.4.D.5	3.4.D.5	No	-	This condition specifies operation requirements of Georgia Rule (tt) for F409.
3.4.D.6	3.4.D.6	No	-	This condition specifies requirements of Georgia Rule (n) for BE1.
3.4.D.7	3.4.D.7	No	-	This condition specifies opacity limits of Georgia Rule (n) for BE1.
Section 3.5.D – Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit [CRM]				
-				
Section 3.2E – Equipment Emission Caps and Operating Limits [UPP]				
-	3.2.E.1	Yes	Deleted per 3357-045-0008-V-05-0.	This condition was removed since Boilers P296 and P297 have been decommissioned.
3.2.E.1	3.2.E.2	No	-	This condition specifies the amount of material burned off by P745.
3.2.E.2	3.2.E.3	No	-	This condition limits HCl emissions from P745.

3.2.E.3	3.2.E.4	No	-	This condition limits VOC emissions from applicable equipment as discussed above.
3.2.E.4	3.2.E.5	No	-	This condition HAP emissions from applicable equipment as discussed above.
3.2.E.5	3.2.E.6	No	-	This condition specifies the type of material burned off limit for P786.
3.2.E.6	3.2.E.7	No	-	This condition limits the amount of material burned off for P786.
3.2.E.7	-	Yes	3.2.E.8 Added per 3357-045-0008-V-04-2.	This condition limits the type of material burned off for P527.
3.2.E.8	-	Yes	3.2.E.9 Added per 3357-045-0008-V-04-2.	This condition limits the amount of material burned off for P527.
Section 3.3.E – Equipment Federal Rule Standards [UPP]				
3.3.E.1	3.3.E.1	No	-	This condition limits HAP emissions from Paint Booth P001.
3.3.E.2	3.3.E.2	No	-	This condition specifies compliance options per 40 CFR 63, Subpart MMMM.
3.3.E.3	3.3.E.3	No	-	This condition specifies compliance options per 40 CFR 63, Subpart MMMM for Paint Booth P001.
3.3.E.4	3,3,E,4	No	-	This condition specifies the predominant activity limit per 40 CFR 63, Subpart MMMM.
3.3.E.5	3.3.E.5	No	-	This condition specifies the facility specific limit per 40 CFR 63, Subpart MMMM.
-	3.3.E.6	Yes	Modified per 3357-045-0008-V-04-3 and deleted per 3357-045-0008-V-05-0.	This condition was removed as part of this renewal since Boilers P296 and P297 have been decommissioned.
-	3.3.E.7	Yes	Modified per 3357-045-0008-V-04-3 and deleted per 3357-045-0008-V-05-0.	This condition was removed as part of this renewal since Boilers P296 and P297 have been decommissioned.

-	3.3.E.8	Yes	Modified per 3357-045-0008-V-04-3 and deleted per 3357-045-0008-V-05-0.	This condition was removed as part of this renewal since Boilers P296 and P297 have been decommissioned.
Section 3.4.E – Equipment SIP Rule Standards [UPP]				
3.4.E.1	3.4.E.1	No	-	This condition specifies applicability of Georgia Rule (e).
3.4.E.2	3.4.E.2	Yes	Modified per 3357-045-0008-V-05-0.	The condition specifies PM emission per Georgia Rule (d). This condition was modified to remove Boiler P296.
-	3.4.E.3	Yes	Deleted per 3357-045-0008-V-05-0.	This condition was deleted because Boiler P297 has been decommissioned.
3.4.E.3	3.4.E.4	No	-	This condition specifies requirements of Georgia Rule (b).
3.4.E.4	3.4.E.5	No	-	This condition specifies opacity limits per Georgia Rule (d).
3.4.E.5	3.4.E.6	Yes	Modified per 3357-045-0008-V-05-0.	This condition limits fuel sulfur content per Georgia Rule (g). This condition was modified to remove Boilers P286 and P287.
3.4.E.6	3.4.E.7	Yes	Modified per 3357-045-0008-V-04-3.	This condition specifies Georgia Rule (tt) limits for P001. This condition was modified to remove P205 as discussed above.
3.4.E.7	3.4.E.8	Yes	Modified per 3357-045-0008-V-04-3.	This condition specifies Georgia Rule (tt) limits for P001. This condition was modified to remove P205 as discussed above.
-	3.4.E.9	Yes	Deleted per 3357-045-0008-V-05-0.	This condition specified Georgia Rule (d) PM limits for applicable equipment. It was deleted as part of this renewal since its requirements are addressed by Condition 3.4.E.2.

Section 3.5.E – Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit [UPP]				
3.5.E.1	3.5.E.1	Yes	Modified per 3357-045-0008-V-05-0.	This condition specifies the bin vent filters check schedule. This condition was modified to change the requirement from every three months to every quarter and change the requirement to replace the filters to clean or replace the filters.
3.5.E.2	3.5.E.2	No	-	This condition requires operation of oil mist collectors for applicable drawing machines.
3.5.E.3	3.5.E.3	No	-	This condition limits the operation of the number of extruders for applicable CV lines.
3.5.E.4	-	Yes	3.5.E.4 Added per 3357-045-0008-V-04-3.	This condition limits the formulation for applicable CV lines.
Section 3.2F – Equipment Emission Caps and Operating Limits [MSG]				
-	3.2.F.1	Yes	Deleted per 3357-045-0008-V-05-0.	This condition has been removed as it is no longer applicable as discussed above.
Section 3.3.F – Equipment Federal Rule Standards [MSG]				
3.3.F.1	3.3.F.1	No	-	This condition limits HAP emissions from Paint Booth P316.
3.3.F.2	3.3.F.2	No	-	This condition specifies compliance options per 40 CFR 63, Subpart MMMM.
3.3.F.3	3.3.F.3	No	-	This condition specifies compliance options per 40 CFR 63, Subpart MMMM for Paint Booth P316.
3.3.F.4	3.3.F.4	No	-	This condition specifies the predominant activity limit per 40 CFR 63, Subpart MMMM.
3.3.F.5	3.3.F.5	No	-	This condition specifies the facility specific limit per 40 CFR 63, Subpart MMMM.
Section 3.4.F – Equipment SIP Rule Standards [MSG]				
3.4.F.1	3.4.F.1	No	-	This condition specifies applicability of Georgia Rule (e).

3.4.F.2	3.4.F.2	No	-	This condition specifies requirements of Georgia Rule (b).
3.4.F.3	3.4.F.3	No	-	This condition specifies Georgia Rule (tt) limits for P316.
3.4.F.4	3.4.F.4	No	-	This condition specifies Georgia Rule (tt) limits for P316.
-	3.4.F.5	Yes	Deleted per 3357-045-0008-V-05-0.	This condition limited HAP emissions from Paint Booth P316. This condition was removed as part of this renewal since its requirements are addressed by Condition 3.3.F.1.
-	3.4.F.6	Yes	Deleted per 3357-045-0008-V-05-0.	This condition specified HAP emission limits for P316 coatings. This condition was removed as part of this renewal since its requirements are addressed by Condition 3.3.F.2.
Section 3.5.F – Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit [MSG]				
-				
Section 3.2G – Equipment Emission Caps and Operating Limits [CTC]				
3.2.G.1	3..2.G.1	Yes	Modified per 3357-045-0008-V-04-3.	This condition limits the daily operation of the test chambers. This condition was modified to add applicable equipment.
3.2.G.2	3..2.G.2	Yes	Modified per 3357-045-0008-V-04-3.	This condition limits the 12 month operation of the test chambers. This condition was modified to add applicable equipment.
3.2.G.3	3..2.G.3	Yes	Modified per 3357-045-0008-V-04-3.	This condition requires operation of the control equipment while applicable test chambers are operating. This condition was modified to add applicable equipment.

3.2.G.4	3..2.G.4	Yes	Modified per 3357-045-0008-V-04-3.	This condition limits opacity from the test chamber. This condition was modified to add the applicable operating scenarios.
3.2.G.5	-	Yes	3.2.G.5 Added per 3357-045-0008-V-04-1.	This condition limits the daily operation of P951.
3.2.G.6	-	Yes	3.2.G.6 Added per 3357-045-0008-V-04-1.	This condition limits the 12 month operation of P951.
3.2.G.7	-	Yes	3.2.G.7 Added per 3357-045-0008-V-04-1.	This condition requires operation of applicable control equipment while P951 is operating.
3.2.G.8	-	Yes	3.2.G.7 Added per 3357-045-0008-V-04-3. Modified per 3357-045-0008-V-05-0.	This condition limits the operation of the test chambers. This condition was modified to correct the condition number.
3.2.G.9	-	Yes	3.2.G.8 Added per 3357-045-0008-V-04-3. Modified per 3357-045-0008-V-05-0.	This condition limits the daily test numbers for the test chambers. This condition was modified to correct the condition number.
3.2.G.10	-	Yes	3.2.G.9 Added per 3357-045-0008-V-04-3. Modified per 3357-045-0008-V-05-0.	This condition limits the twelve month test numbers for the test chambers. This condition was modified to correct the condition number.
3.2.G.11	-	Yes	3.2.G.10 Added per 3357-045-0008-V-04-3. Modified per 3357-045-0008-V-05-0.	This condition requires operation of applicable control equipment while the test chambers are operating. This condition was modified to correct the condition number.
3.2.G.12	-	Yes	3.2.G.11 Added per 3357-045-0008-V-04-3. Modified per 3357-045-0008-V-05-0.	This condition requires the removal of Operation Scenario 1 when Operation Scenario 2 is implemented as discussed above. This condition was modified to correct the condition number.

Section 3.3.G – Equipment Federal Rule Standards [CTC]				
3.3.G.1	3.3.G.1	Yes	Modified per 3357-045-0008-V-04-3.	This condition specifies applicability of 40 CFR 63, Subpart DDDDD to P911. This condition was modified to update language.
3.3.G.2	-	Yes	3.3.G.2 Added per 3357-045-0008-V-04-3.	This condition specifies limitations per 40 CFR 63, Subpart DDDDD for P911.
3.3.G.3	-	Yes	3.3.G.3 Added per 3357-045-0008-V-04-3.	This condition specifies operating requirements per 40 CFR 63, Subpart DDDDD for P911.
Section 3.4.G – Equipment SIP Rule Standards [CTC]				
3.4.G.1	3.4.G.1	No	-	This condition specifies applicability of Georgia Rule (e).
3.4.G.2	3.4.G.2	No	-	This condition specifies fuel sulfur content requirements of Georgia Rule (g).
3.4.G.3	3.4.G.3	No	-	This condition specifies opacity limits of Georgia Rule (d) for P911.
3.4.G.4	3.4.G.4	No	-	This condition specifies PM limits of Georgia Rule (d) for P911.
3.4.G.5	-	Yes	3.4.G.5 Added per 3357-045-0008-V-04-1. Modified per 3357-045-0008-V-05-0.	This condition specifies applicability of Georgia Rule (b) for P951. This condition was modified to add the other test chambers and the CTC Extruder.
Section 3.5.G – Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit [CTC]				
-				
Section 3.2H – Equipment Emission Caps and Operating Limits [CEM]				
3.2.H.1	3..2.H.1	No	-	This condition limits the operating hours of applicable engines.
3.2.H.2	3..2.H.2	No	-	This condition specifies operating limits per Georgia Rule (mmm) for applicable engines.
3.2.H.3	3.2.H.3	No	-	This condition limits annual operating hours of applicable engines.

Section 3.3.H – Equipment Federal Rule Standards [CEM]				
3.3.H.1	3.3.H.1	No	-	This condition specifies applicability of 40 CFR 63, Subpart ZZZZ for applicable engines.
3.3.H.2	3.3.H.2	No	-	This condition specifies applicability of 40 CFR 63, Subpart ZZZZ for applicable engines.
3.3.H.3	3.3.H.3	No	-	This condition specifies emission limits per 40 CFR 63, Subpart ZZZZ for applicable engines.
3.3.H.4	3.3.H.4	No	-	This condition specifies catalyst requirements per 40 CFR 63, Subpart ZZZZ for applicable engines.
3.3.H.5	3.3.H.5	No	-	This condition specifies compliance requirements per 40 CFR 63, Subpart ZZZZ for applicable engines.
3.3.H.6	3.3.H.6	No	-	This condition specifies compliance requirements per 40 CFR 63, Subpart ZZZZ for applicable engines.
3.3.H.7	3.3.H.7	No	-	This condition specifies applicability of 40 CFR 60, Subpart JJJJ for applicable engines.
3.3.H.8	3.3.H.8	No	-	This condition specifies emission limits per 40 CFR 60, Subpart JJJJ for applicable engines.
3.3.H.9	3.3.H.9	No	-	This condition specifies applicability of 40 CFR 60, Subpart IIII for applicable engines.
3.3.H.10	3.3.H.10	No	-	This condition specifies emission limits per 40 CFR 63, Subpart ZZZZ for applicable engines.
3.3.H.11	3.3.H.11	No	-	This condition specifies compliance requirements per 40 CFR 63, Subpart ZZZZ for applicable engines.

3.3.H.12	3.3.H.12	No	-	This condition specifies compliance requirements per 40 CFR 63, Subpart ZZZZ for applicable engines.
3.3.H.13	3.3.H.13	No	-	This condition specifies operating hours limitations per 40 CFR 63, Subpart ZZZZ for applicable engines.
3.3.H.14	3.3.H.14	No	-	This condition specifies operating hours limitations per 40 CFR 63, Subpart ZZZZ for applicable engines.
3.3.H.15	3.3.H.15	No	-	This condition specifies operating requirements per 40 CFR 60, Subpart JJJJ for applicable engines.
-	-	Yes	3.4.H.16 Added per 3357-045-0008-V-04-2. Deleted per 3357-045-0008-V-05-0.	Replacement Engine P817 is less than 25 Hp. Therefore this condition is no longer applicable.
-	-	Yes	3.4.H.17 Added per 3357-045-0008-V-04-2. Deleted per 3357-045-0008-V-05-0.	Replacement Engine P817 is less than 25 Hp. Therefore this condition is no longer applicable.
Section 3.4.H – Equipment SIP Rule Standards [CEM]				
3.4.H.1	3.4.H.1	No	-	This condition specifies applicability of Georgia Rule (b).
3.4.H.2	3.4.H.2	No	-	This condition specifies fuel sulfur content requirements of Georgia Rule (g).
3.4.H.3	3.4.H.3	No	-	This condition specifies NO_x emissions limits of Georgia Rule (mmm).
3.4.H.4	3.4.H.5	No	-	This condition specifies fuel sulfur content requirements of 40 CFR 60, Subpart IIII.
-	-	Yes	3.4.H.5 Added per 3357-045-0008-V-04-2. Deleted per 3357-045-0008-V-05-0.	Replacement Engine P817 is less than 25 Hp. Therefore this condition is no longer applicable.

Section 3.5.H – Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit [CEM]				
3.5.H.1	3.5.H.1	No	-	This condition requires operation of control equipment for applicable engines during operation.
Section 3.2I – Equipment Emission Caps and Operating Limits [TAP]				
-				
Section 3.3.I – Equipment Federal Rule Standards [TAP]				
3.3.I.1	-	Yes	3.3.I.1 Added per 3357-045-0008-V-04-5.	This condition limits HAP emissions from P970. This condition was added when TAP was added to the permit.
3.3.I.2	-	Yes	3.3.I.2 Added per 3357-045-0008-V-04-5.	This condition specifies compliance options per 40 CFR 63, Subpart MMMM. This condition was added when TAP was added to the permit.
3.3.I.3	-	Yes	3.3.I.3 Added per 3357-045-0008-V-04-5.	This condition specifies applicability of 40 CFR 63, Subpart MMMM. This condition was added when TAP was added to the permit.
3.3.I.4	-	Yes	3.3.I.4 Added per 3357-045-0008-V-04-5.	This condition specifies the predominant activity emission limit per 40 CFR 63, Subpart MMMM. This condition was added when TAP was added to the permit.
3.3.I.5	-	Yes	3.3.I.5 Added per 3357-045-0008-V-04-5.	This condition specifies the facility specific emission limit per 40 CFR 63, Subpart MMMM. This condition was added when TAP was added to the permit.
Section 3.4.I – Equipment SIP Rule Standards [TAP]				
3.4.I.1	-	Yes	3.4.I.1 Added per 3357-045-0008-V-04-5.	This condition specifies applicability of Georgia Rule (e). This condition was added when TAP was added to the permit.
3.4.I.2	-	Yes	3.4.I.2 Added per 3357-045-0008-V-04-5.	This condition specifies applicability of Georgia Rule (b). This condition was added when TAP was added to the permit.

3.4.I.3	-	Yes	3.4.I.3 Added per 3357-045-0008-V-04-5.	This condition specifies applicability of Georgia Rule(tt). This condition was added when TAP was added to the permit.
3.4.I.4	-	Yes	3.4.I.4 Added per 3357-045-0008-V-04-5.	This condition specifies applicability of Georgia Rule (tt). This condition was added when TAP was added to the permit.
Section 3.5.I – Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit [TAP]				
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IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

Permit Condition 4.1.3 has been updated to list all applicable test reference methods for applicable equipment located at the Southwire Title I site.

B. Specific Testing Requirements

1. Copper Rod Mill –

Individual Equipment:

None applicable.

Equipment Groups (all subject to the same test requirements):

None applicable.

2. Utility Products Plant –

Individual Equipment:

Per Permit Number 3357-045-0052-V-02-1, Southwire submitted an excerpted test report dated November 5, 2007, which was received by the Division on November 6, 2007. The report contained excerpts from a 1994 engineering test conducted on extrusion lines 0730-03 and 0750-02, which are similar to the proposed CV lines. The test report also contained data for the degassing oven and the 11-hour annealing oven. The data from the 11-hour annealing oven was used to estimate emissions from the proposed 12-hour annealing oven P523. Emissions from the electric induction annealer P759 are based on the emission factors developed from the testing of the SCUPP in-line annealer 460-01.

The excerpted emissions testing data submitted for the extrusion lines 0730-03 and 0750-02, were reviewed by the Division's Industrial Source Monitoring Program, and deemed acceptable. Therefore, the emission factors established by this performance test are deemed acceptable at this time. However, the Division will require Southwire to conduct testing of the proposed CV lines to establish unit specific emission factors which will be used to determine compliance with applicable VOC NSR avoidance limits. To determine an accurate emission factor, the performance testing should be conducted at or near maximum capacity (i.e. maximum line speed and all extruders operating).

In an email dated April 30, 2008, Southwire indicates that only three extruders can operate at any given time as discussed in Section IV C of this document. Therefore, Southwire does not propose to conduct performance testing with all four extruders operating. According to Southwire, the line capacities are dictated by curing tube length, not extruder speed. Southwire does not have a good handle on the actual line capacity in terms of pounds of compound per hour; however, the proposed larger lines would be very similar to one of the lines at the Southwire plant in Alabama. According to the information Southwire Company Carrollton facility has, the Alabama line has a plastic capacity of approximately 1,800 lb/hr (much lower than the 4,100 lb/hr capacity listed in permit application 17675). According to Southwire Company, the smaller lines will probably have a capacity closer to 1,000 lb/hr (versus the 2,600 lb/hr listed in permit application 17675). The capacity will vary per each product (products with less compound move at a faster line speed than products with more compound). Also, according to Southwire, this line speed is not necessarily linear...meaning that the thicker products likely remain in the curing tube (on a per pound basis) longer than the thinner products, just because it takes longer to cure the entire thickness. Therefore, Southwire proposes to run one of its worst-case products (thicker cables) during the performance test. Southwire proposes that the emission factors (on a lb pollutant/lb compound basis) determined from the stack test (which will be on one of the larger CV lines, since it will be installed first) would be sufficiently scalable to calculate emissions no matter the actual production rate.

The Division's Industrial Source Monitoring Program, has agreed to allow the testing of the larger machine as proposed provided that Southwire detail in its performance test plan how such testing will be conducted and demonstrate how it will provide a representative evaluation that will demonstrate compliance with applicable emission limits. That plan must be submitted for Division Industrial Monitoring Program's review before any such testing is conducted.

The emission factor derived from the proposed testing of one of the larger CV lines must be used to estimate emissions from the larger and smaller CV lines, no matter what the product. If a separate emission factor is requested for the smaller CV lines, Southwire must submit a request to conduct testing on such equipment as was required for the larger CV lines. The performance testing will be an initial performance test requirement only. The performance testing shall also establish emission factors for acetophenone and cumene emissions from the CV lines during the testing of the larger CV line.

The excerpted emissions testing data submitted for the existing 11-hour annealing oven were reviewed by the Division's Industrial Source Monitoring Program, and deemed acceptable. Therefore, the emission factors established by this performance test are deemed acceptable at this time. However, the Division requests that Southwire conduct testing of the proposed 12-hour annealing oven P523 to establish unit specific emission factors which will be used to determine compliance with applicable VOC NSR avoidance limits. To determine an accurate emission factor, the performance testing must be conducted at maximum capacity. The performance testing will be an initial performance test requirement only.

The emission factors established by the UPP in-line annealer 460-01 have already been accepted by the Division. However, Application 17675 indicates that the proposed electric induction annealer P759 uses less than 10 percent of the lubricant used on typical drawing and annealing operations, and therefore reasons that emission factors used to estimate emissions from the proposed electric induction annealer should equate to 10 percent of the emission factors developed from the testing of the UPP in-line annealer 460-01. No manufacturers' data or other acceptable documentation was provided to support this claim. Therefore, the Division has determined that the emission factors established by the UPP in-line annealer 460-01 shall be used to determine emissions. However, the Division will allow Southwire the option to conduct testing of the proposed electric induction annealer P759 to establish unit specific emission factors which will be used to determine compliance with applicable VOC NSR avoidance limits. To determine an accurate emission factor, the performance testing must be conducted at maximum capacity. The performance testing will be an initial performance test requirement only.

Per Permit Number 3357-045-0052-V-02-1, emission factors have already been accepted by the Division for the operation of similar drawing machines and jacket extrusion lines located on the Southwire Carrollton Title I Site. Therefore, performance testing is not required for the two (2) PE Jacket Extrusion lines each will be equipped with associated pellet hoppers (Source IDs: P519 through P522; and the three (3) drawing machines (Source IDs: P524 through P526).

Equipment Groups (all subject to the same test requirements):

None applicable.

3. Building Wire Plant –

   Individual Equipment:

   None applicable.

   Equipment Groups (all subject to the same test requirements):

   None applicable.

4. MC Plant and Machine Services Group –

Individual Equipment:

40 CFR 60 NSPS Subpart TT- Standards for Metal Coil Surface Coating
Per Permit Number 3449-045-0038-V-03-1, Southwire must conduct an initial performance test for the UV-cured application system in accordance with §60.8(a). Southwire must continue to conduct performance tests for this source for each calendar month for each affected facility according to the procedures of §60.463. Section 60.8(d) and (f) do not apply to the performance test. The 'testing' requirement under this regulation is the compliance demonstration. Southwire proposes to comply with this regulation through the use of compliant coatings.

The reference methods in 40 CFR 60 Appendix A, except as provided in 40 CFR 60.8(b), will be used to determine compliance with the emission limit [40 CFR 60.466(a)]. Method 24, or data provided by the formula of the coating, will be used to determine the VOC content of each coating as applied to the surface of the metal coal. In the event of a dispute, Method 24 will be the reference method. Results of Method 24 analysis will be adjusted as described in Section 12.6 of Method 24 when VOC content of waterborne coatings, determined by Method 24, is used to determine compliance of affected facilities [40 CFR 60.466(a)(1)]. The Division will approve testing of representative stacks on a case-by-case basis if Southwire can demonstrate to the Division's satisfaction that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks [40 CFR 60.466(d)]. The following test methods in 40 CFR 60 Appendix A are applicable to performance testing: Method 1 will be used for sample and velocity transverses; Method 2 will be used for velocity and volumetric flow rate; Method 3 will be used for gas analysis; and Method 4 will be used for stack gas moisture [40 CFR 60.466(a)(3) through (6)].

40 CFR 63 NESHAP Subpart SSSS- Standards for Surface Coating of Metal Coil
Since Southwire proposes to limit HAP or volatile matter content of coatings for P358, it must determine the HAP or volatile matter and solids content of coating materials according to the requirements of 40 CFR 63.4160(b) and (c), per Permit Number 3449-045-0038-V-03-1. Method 311 of 40 CFR 63 Appendix A will be used to determine organic HAP content. Method 24 of 40 CFR 60, Appendix A can be used to determine the total volatile matter content as a weight fraction of nonaqueous volatile matter and used as a substitute for determining organic HAP. To determine solids content of each coating material applied, Southwire may use ASTM D297-86 (Reapproved 1998 or ASTM D6093-9 (incorporated by reference, see §63.14, or an EPA approved alternative method.

Equipment Groups (all subject to the same test requirements):

None applicable.

5. Cofer Technology Center –

   Individual Equipment:

   None applicable.

   Equipment Groups (all subject to the same test requirements):

   None applicable.

6. Corporate Energy Management –

   Individual Equipment:

   40 CFR 60 - NSPS Subpart JJJJ – Standards for Stationary Spark Ignition Internal Combustion Engines
   Per Permit Number 3357-045-0051-V-02-2, Southwire must follow the procedures in 40 CFR 60.4244(d) through (f) when conducting performance testing for Waukesha Engine P804. Each performance test must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and according to the requirements in 40 CFR 60.8 and under the specific conditions that are specified by Table 2 of 40 CFR 60, Subpart JJJJ [40 CFR 60.4244].

   Southwire must conduct three separate test runs for each performance test required in 40 CFR 60.4244, as specified in 40 CFR 60.8(f). Each test run must last at least 1 hour. Southwire must conduct an initial performance test and conduct subsequent performance testing for Waukesha Engine P804 every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance with 40 CFR 60 Subpart JJJJ because it is not a certified engine as defined in the rule [40 CFR 60.4243(c), 40 CFR 60.4243(b)(2)(ii)].

   Per Permit Number 3357-045-0051-V-02-3, the same requirements were added for P805 and P806.

40 CFR 63 NESHAP Subpart ZZZZ- Standards for Stationary Reciprocating Internal Combustion Engines (RICE)

To comply with the 40 CFR 63, Subpart ZZZZ limits, Southwire is required to conduct initial performance test or other initial compliance demonstrations in Table 4 of 40 CFR 63, Subpart ZZZZ that apply within 180 days after the compliance date of June 15, 2007 for each of the Waukesha Engines per Permit Number 3357-045-0051-V-02-0. Each performance test must be conducted according to the requirements in §63.7(e)(1) and under the specific conditions that 40 CFR 63, Subpart ZZZZ specifies in Table 4. The test must be conducted at any load condition within plus or minus 10 percent of 100 percent load. The Permittee may not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in 40 CFR 63.7(e)(1), and must conduct three separate test runs for each performance test required, as specified in 40 CFR 63.7(e)(3). Each test run must last at least 1 hour [40 CFR 63.6595(a)(1), 40 CFR 63.6620, and Table 4 of 40 CFR 63, Subpart ZZZZ]. Southwire must conduct subsequent performance tests as specified in Tables 3 and 4 of 40 CFR Part 63, Subpart ZZZZ for each of the Waukesha Engines [40 CFR 63.6615, 40 CFR 66.6620, and Tables 3 and 4 of 40 CFR 63, Subpart ZZZZ]. In the event Southwire changes the catalyst in any of the control devices, it must reestablish the values of the operating parameters measured during the initial performance test. When Southwire reestablishes the values of operating parameters, it must also conduct a performance test to demonstrate that the required emission limitations applicable to each of the Waukesha Engines are met [40 CFR 63.6640(b)].

To comply with the 40 CFR 63, Subpart ZZZZ limits, Southwire is required to conduct initial performance test or other initial compliance demonstrations in Table 4 of 40 CFR 63, Subpart ZZZZ that apply within 180 days after startup of the Waukesha Engine P804 per Permit Number 3357-045-0051-V-02-3. Each performance test must be conducted according to the requirements in 40 CFR 63.7(e)(1) and under the specific conditions that 40 CFR 63, Subpart ZZZZ specifies in Table 4. The test must be conducted at any load condition within plus or minus 10 percent of 100 percent load. Southwire can not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in 40 CFR 63.7(e)(1), and must conduct three separate test runs for each performance test required, as specified in 40 CFR 63.7(e)(3). Each test run must last at least 1 hour [40 CFR 63.6595(a)(3), 40 CFR 63.6620, and Table 4 of 40 CFR Part 63, Subpart ZZZZ]. Southwire must conduct subsequent performance tests as specified in Tables 3 and 4 of 40 CFR 63, Subpart ZZZZ for Waukesha Engine P804 [40 CFR 63.6615, 40 CFR 66.6620, and Tables 3 and 4 of 40 CFR 63, Subpart ZZZZ]. In the event Southwire changes the catalyst in the control devices, it must reestablish the values of the operating parameters measured during the initial performance test. When Southwire reestablishes the values of operating parameters, it must also conduct a performance test to demonstrate that the required emission limitations applicable to Waukesha Engine P804 are met [40 CFR 63.6640(b)].

Per Permit Number 3357-045-0051-V-02-3, the same requirements were added for P805 and P806.

Equipment Groups (all subject to the same test requirements):

None applicable.

7. Tools and Assembled Parts –

Individual Equipment:

None applicable.

Equipment Groups (all subject to the same test requirements):

None applicable.

Permit conditions for specific testing requirements in Section 4.0 are summarized below.

Permit Condition in Permit Number 3357-045-0008-V-05-0	Permit Condition Number in Permit Number 3357-045-0008-V-04-0	Permit Condition Deleted, Modified or Added since issuance of Permit Number 3357-045-0008-V-04-0	Deleted Modified or Added per what Permit Number 3357-045-0008-V-04-0	Explanation of Permit Condition
Section 4.2A – Specific Testing Requirements [MULTI]				
-				
Section 4.2B – Specific Testing Requirements [BWP]				
-				
Section 4.2C – Specific Testing Requirements [MC]				
4.2.C.1	4.2.C.1	No	-	This condition specifies monthly testing for P358.
4.2.C.2	4.2.C.2	No	-	This condition requires determination of VOC, HAP and solid coating materials for P358.
Section 4.2.D – Specific Testing Requirements [CRM]				
-				
Section 4.2E – Specific Testing Requirements [UPP]				
4.2.E.1	4.2.E.1	No	-	This condition requires testing of P523 for VOC emissions.
Section 4.2F – Specific Testing Requirements [MSG]				
-				
Section 4.2G – Specific Testing Requirements [CTC]				
-				
Section 4.2H – Specific Testing Requirements [CEM]				
4.2.H.1	4..2.H.1	No	-	This condition specifies testing per 40 CFR 63, Subpart ZZZZ.
4.2.H.2	4..2.H.2	No	-	This condition specifies determination of emissions reduction per 40 CFR 63, Subpart ZZZZ.

4.2.H.3	4.2.H.3	No	-	This condition specifies normalization of formaldehyde emissions per 40 CFR 63, Subpart ZZZZ.
4.2.H.4	4.2.H.4	No	-	This condition specifies engine percent load requirements per 40 CFR 63, Subpart ZZZZ.
4.2.H.5	4.2.H.5	Yes	Deleted per 3357-045-0008-V-05-0.	This condition specifies catalyst requirements per 40 CFR 63, Subpart ZZZZ. This condition was modified to reflect regulatory language related to testing schedule.
4.2.H.6	4.2.H.6	No	-	This condition specifies compliance requirements per 40 CFR 63, Subpart ZZZZ.
4.2.H.7	4.2.H.7	No	-	This condition specifies performance testing requirements per 40 CFR 63, Subpart ZZZZ.
4.2.H.8	4.2.H.8	No	-	This condition specifies applicable testing methods requirements per 40 CFR 60, Subpart JJJJ.
4.2.H.9	4.2.H.9	No	-	This condition specifies performance testing per 40 CFR 60, Subpart JJJJ.
Section 4.2I – Specific Testing Requirements [TAP]				
-				

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

1. Copper Rod Mill –

Individual Equipment:

Permit Number 3351-045-0008-V-02-2 required Southwire to conduct periodic visible emissions observations (Pellet Hoppers and Drawing Machines) and periodic filter inspection and replacement (Silos) to ensure that the control devices were operating correctly.

Drawing Machines P477 and P478, subject to PSD avoidance limits for PM_{10}, NAA NSR Avoidance limits for $PM_{2.5}$, Georgia Rule 391-3-1-.02(2)(b), and Georgia Rule 391-3-1-.02(2)(e)1(i.), P478 uses an oil mist collector to control drawing machine emissions. Southwire proposed that normal operation of this control device will ensure that PM_{10} and $PM_{2.5}$ emissions from the appropriate equipment will be below the applicable PSD avoidance limit. No monitoring of this device other than preventative maintenance is prescribed.

Per Permit Number 3351-045-0008-V-02-3, periodic monitoring associated with the originally Southwire proposed electrostatic precipitators (ESPs) at 80 percent efficient particulate matter control devices on drawing and annealing equipment was removed since the equipment was not installed. In addition, periodic monitoring was established for an oil mist collector associated with P478.

Equipment Groups (all subject to the same monitoring requirements):

None applicable.

2. Utility Products Plant –

Individual Equipment:

Permit Number 3357-045-0052-V-01-3 required Southwire to conduct periodic visible emissions observations (Pellet Hoppers and Drawing Machines) and periodic filter inspection and replacement (Silos) to ensure that the control devices were operating correctly. In addition, periodic monitoring was established for an oil mist collector associated with P478 per Permit Condition 5.2.7 (which replaced permit condition 5.2.6 in Permit Number 3357-045-0052-V-01-3). Also, per Permit Number 3357-045-0052-V-01-5, periodic monitoring associated with the originally Southwire proposed electrostatic precipitators (ESPs) at 80 percent efficient particulate matter control devices on drawing and annealing equipment was removed since the equipment was not installed.

Per Permit Number 3357-045-0052-V-02-1, the newly proposed Drawing Machines P524 and P525 at the UPP are subject to Georgia Rule 391-3-1-.02(2)(e)1(i.). Southwire will install and operate oil mist collectors (Air Pollution Control IDs C524 and C525) to control drawing emissions. Southwire proposed that normal operation of this control device will ensure that PM_{10} and $PM_{2.5}$ emissions from the appropriate equipment will be below the applicable rule limits. No monitoring of this device other than preventative maintenance discussed below is prescribed since the sources do not vent to the atmosphere, but inside the building.

Per Permit Number 3357-045-0052-V-02-1, the Division accepted preventative maintenance as the approved monitoring method for the applicable control equipment, however the facility must develop a Preventative Maintenance Plan which is subject to Division review to insure proper control equipment operation. The plan, must include at a minimum, include the following monitoring.

- Monthly inspection of the oil mist collectors to ensure proper operation per manufacturer's specifications. Maintenance of a record of such inspections including the date and time in a monthly inspection log suitable for inspection or submittal is also required.

- Replacement and/or cleaning of the oil mist collector media for oil mist collectors per manufacturer's specifications or semiannually at a minimum, whichever is more frequent. Maintenance of a record of such maintenance including the date and time in a maintenance log suitable for inspection or submittal is also required.

- For each source that exhibits visible emissions, SCUPP will be required to determine the cause of the visible emissions and correct the problem expeditiously. SCUPP will be required to record the cause of the visible emissions and the corrective action taken in a maintenance log suitable for inspection or submittal

40 CFR 63 NESHAP Subpart MMMM – Standards for Surface Coating of Miscellaneous Metal Parts and Products
Per 40 CFR 63.3900(b), at all times, including periods of startup, shutdown, and malfunction, Southwire must operate and maintain Paint Booth P001, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. These requirements were added per Permit Number 3357-045-0052-V-02-6.

Georgia Rule 391-3-1-.02(2)(b) – Emission Limitations and Standards – Visible Emissions and *Georgia Rule 391-3-1-.02(2)(e)1 – Emission Limitations and Standards – Particulate Emission from Manufacturing Processes*
Emission Unit P001 is subject to Georgia Rule 391-3-1-.02(2)(b) and Georgia Rule 391-3-1-.02(2)(e). In order to meet these limits, Southwire will install and operate an overspray filter (Air Pollution Control ID C001) to control painting emissions. Southwire proposes that normal operation of this control device will ensure that PM_{10} and $PM_{2.5}$ emissions from the appropriate equipment will be below the applicable limit. These requirements were added per Permit Number 3357-045-0052-V-02-6.

3. Building Wire Plant –

Individual Equipment:

Permit Number 3357-045-0012-V-01-3 required Southwire to conduct periodic visible emissions observations (Pellet Hoppers and Drawing Machines) and periodic filter inspection and replacement (Silos) to ensure that the control devices were operating correctly.

Emission Unit P685 at the BWP, subject to PSD avoidance limits for PM_{10}, NAA NSR Avoidance limits for $PM_{2.5}$, Georgia Rule 391-3-1-.02(2)(b), and Georgia Rule 391-3-1-.02(e)(2)1(i.), uses a bin vent filter (Air Pollution Control ID C685) to control silo emissions. Southwire proposed that normal operation of this control device will ensure that PM_{10} and $PM_{2.5}$ emissions from the appropriate equipment will be below the applicable PSD avoidance limit. No monitoring of this device other than preventative maintenance.

Per Permit Number 3357-045-0012-V-01-5, periodic monitoring associated with the originally Southwire proposed electrostatic precipitators (ESPs) at 80 percent efficient particulate matter control devices on drawing and annealing equipment was removed since the equipment was not installed. In addition, periodic monitoring was established for an oil mist collector associated with P478.

Equipment Groups (all subject to the same monitoring requirements):

Not applicable.

4. MC Plant and Machine Services Group –

Individual Equipment:

Machine Services Group, Building Wire Plant, Utility Products Plant, and Copper Rod Mill have installed or propose to install Drawing Machines P477, P478, P643, P656, P660, P661, P681, P682, P332, and P744; Storage Silos P670, P671, P683, and P684; and Pellet Hoppers P632, P635, P638, P641, P645, P650, P653, P658, P663, P666, P673, P676, P679, P324, P327, P330, P334, P337, P347, P350, P736, P742, P749, and P752. These units are subject to PSD avoidance limits for PM_{10}, NAA NSR Avoidance limits for $PM_{2.5}$, Georgia Rule 391-3-1-.02(2)(b), and Georgia Rule 391-3-1-.02(2)(e). Monitoring associated with these sources is discussed in detail in the narratives associated with Permit Numbers 3349-045-0008-V-02-3, 3351-045-0043-V-01-3, 3357-045-0052-V-01-3, and 3351-045-0008-02-2.

Originally Southwire proposed to install 80 percent efficient particulate matter control devices on drawing and annealing equipment located at the Copper Rod Mill, Machine Services Group facility and Building Wire Plant. By correcting the emission factor, Southwire proposes that no controls are necessary. Southwire indicated that it had previously gained concurrence from the Division on this proposal. Therefore, monitoring associated with such control equipment is no longer valid and has been removed.

Machine Services Group was subject to conducting visible emissions on applicable control equipment. However, Southwire proposes to conduct preventative maintenance on the applicable control devices in lieu of the visible emissions as follows:

- Inspect dust filters at least once every three months.
- Replace or clean the dust filter media at least biannually.
- Maintain a log indicating the date and time the dust filters were inspected and cleaned or replaced.

The Division will accept preventative maintenance as the approved monitoring method for the applicable control equipment, however the facility must develop a Preventative Maintenance Plan which is subject to Division review to insure proper control equipment operation. The plan, must include at a minimum, include the following monitoring.

- Monthly inspection of the dust filters to ensure proper operation per manufacturer's specifications. Maintenance of a record of such inspections including the date and time in a monthly inspection log suitable for inspection or submittal is also required.
- Replacement and/or cleaning of the dust filter media for dust filters per manufacturer's specifications or annually at a minimum, whichever is more frequent. Maintenance of a record of such maintenance including the date and time in a maintenance log suitable for inspection or submittal is also required.

- For each source that exhibits visible emissions, MSG will be required to determine the cause of the visible emissions and correct the problem expeditiously. MSG will be required to record the cause of the visible emissions and the corrective action taken in a maintenance log suitable for inspection or submittal.

40 CFR 63 NESHAP Subpart MMMM – Standards for Surface Coating of Miscellaneous Metal Parts and Products
Per 40 CFR 63.3900(b), at all times, including periods of startup, shutdown, and malfunction, Southwire must operate and maintain Paint Booth P316, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. These requirements were added per Permit Number 3357-045-0008-V-04-0.

40 CFR 63 NESHAP Subpart MMMM – Standards for Surface Coating of Miscellaneous Metal Parts and Products
As included in Permit Number 3357-045-0008-V-04-2, per 40 CFR 63.3900(b), at all times, including periods of startup, shutdown, and malfunction, Southwire must operate and maintain Printers P361-P380, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

Equipment Groups (all subject to the same monitoring requirements):

Not applicable.

5. Cofer Technology Center –

Individual Equipment:

Per Permit Number 3357-045-0043-V-01-0, Chamber P910 is subject to Georgia Rules 391-3-1-.02(2)(e), (b) and (g) for PM emissions, visible emissions, and fuel sulfur content; and Georgia Rule 391-3-1-.03(2)(c) for visible emissions. Georgia Rule 391-3-1-.03(2)(c) subsumes the requirements of Georgia Rule (b). The chamber utilizes a mini-HEAF fabric filter/mist eliminator (C910). Currently, filter C910 is automatically monitored by a pressure indicator. Feedback from the pressure indicator causes new filter media to be rolled into place when needed.

Title V periodic monitoring will consist of a daily visible emissions determination by the prescribed test method (Method 9) during a flame test to provide reasonable assurance that the Georgia Rule (e) and Georgia Rule 391-3-1-.03(2)(c) standards are not exceeded. Any six-minute average in excess of the 20 percent limit must be reported as an exceedance. The Method 9 results will be sufficient to verify compliance with Condition 3.2.G.3 (i.e., that the CTC is operating the flame chamber with controls).

Per Permit Number 2257-045-0008-V-04-1, Fire Test Chamber P951 is research and development equipment that will operate on an intermittent basis unlike process equipment which could operate more frequently. In addition, the test chamber has operational limits discussed above. Scrubber monitoring requirements usually imposed by the Division for process equipment may be excessive and burdensome for a research and development operation. Due to the operational limits of the test chamber and its research and development status, the Division did not propose to impose any additional monitoring of the venturi scrubber other than that specified by the manufacturer of the equipment. Therefore, no monitoring requirements were added or modified as a result of this modification.

Per Permit Number 2257-045-0008-V-04-3, Scrubbers C912 and C951 will be required to monitor and record applicable operating parameters to demonstrate compliance with the *Georgia Toxics Guidelines*.

40 CFR 63 NESHAP Subpart DDDDD – Standards for Industrial, Commercial, Institutional Boilers and Process Heaters
As added in Permit Number 2257-045-0008-V-04-3, per 40 CFR 63.7540(a)(12), Southwire must conduct tune-up of the Boiler P911 to demonstrate continuous compliance as specified in 40 CFR 63.7540(a)(10)(i) through (vi). specified in paragraphs (a)(10)(i) through (vi) every five years.

Equipment Groups (all subject to the same monitoring requirements):

Not applicable

6. Corporate Energy Management –

   Individual Equipment:

   Permit Number 3357-045-0051-V-01-2 specifies monitoring of NOx emissions from engines with emission unit ID Nos. P800, P801, and P802 for verification of compliance with Georgia Rule (mmm) and thus for PSD avoidance purposes.

   The facility must monitor the operation hours of the Waukesha Engines and ITS Generator.

Per Permit Number 3357-045-0051-V-02-0, to demonstrate compliance with 40 CFR 63, Subpart ZZZZ, the facility must install, calibrate, maintain, and operate a system to continuously monitor and record the catalyst inlet temperature for each control device of each Waukesha engine in accordance with the requirements in 40 CFR 63.8 [40 CFR 63.6625(b), Table 6 of 40 CFR Part 63, Subpart ZZZZ]. The system must be able to: (1) reduce data to 4-hour rolling averages; and (2) maintain the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature [40 CFR 63.6625(b) and Table 6 of 40 CFR 63, Subpart ZZZZ]. Southwire must also install, calibrate, maintain, and operate monitoring devices to measure pressure drop across the catalyst for control devices each of the Waukesha Engines. Data shall be recorded monthly and demonstrate that the pressure drop across the catalyst is within the operating limitation established during the performance tests conducted in accordance with Permit Conditions 4.2.H.1, 4.2.H.6, and 4.2.H.5 [40 CFR 63.6640, Table 6 of 40 CFR 63, Subpart ZZZZ].

40 CFR 60 - NSPS Subpart JJJJ – Standards for Stationary Spark Ignition Internal Combustion Engines

There are no monitoring requirements specified for Waukesha Engines P804, P805, or P806 under this regulation.

40 CFR 63 NESHAP Subpart ZZZZ – Standards for Stationary Reciprocating Internal Combustion Engines (RICE)

Per Permit Number 3557-045-0051-V-02-2, to demonstrate compliance with 40 CFR 63, Subpart ZZZZ, the facility must install, calibrate, maintain, and operate a system to continuously monitor and record the catalyst inlet temperature for control system of Waukesha Engine P804 in accordance with the requirements in 40 CFR 63.8 [40 CFR 63.6625(b), Table 6 of 40 CFR 63, Subpart ZZZZ]. The system must be able to: (1) reduce data to 4-hour rolling averages; and (2) maintain the 4-hour rolling averages within the operating limitations for the catalyst inlet temperature [40 CFR 63.6625(b) and Table 6 of 40 CFR 63, Subpart ZZZZ]. Southwire must also install, calibrate, maintain, and operate a monitoring device to measure pressure drop across the catalyst for the control system of Waukesha Engine P804. Data must be recorded monthly and demonstrate that the pressure drop across the catalyst is within the operating limitation established during the performance tests conducted in accordance with the rule [40 CFR 63.6640, Table 6 of 40 CFR 63, Subpart ZZZZ]. The same requirements were added per Permit Number 3357-045-0051-V-02-3 for Engines P805 and P806.

Georgia Rule 391-3-1-.02(2)(mmm) NO_x Emissions from Stationary Gas Turbines and Stationary Engines used to Generate Electricity

Per Permit Number 3557-045-0051-V-02-2, to comply with this regulation Southwire must install, calibrate, maintain, and operate a system to continuously monitor the catalyst inlet temperature. Data must be recorded each hour or portion of each hour of operation of the catalyst. This requirement shall be effective from May 1 through September 30 of each year. In addition, this regulation requires Southwire to install, calibrate, maintain, and operate a monitoring device to measure the pressure drop across the catalyst. Measurement of the pressure drop across the catalyst is already required per 40 CFR 63, Subpart ZZZZ.

Southwire must also monitor the NO_x emissions from the Waukesha Engine P804 during the period from May 1 through September 30 each year by performing a test measurement to demonstrate that the NO_x concentrations corrected to 15 percent Oxygen are below the applicable standard. The same requirements were added per Permit Number 3357-045-0051-V-02-3 for Engines P805 and P806.

Per Permit Number 3357-045-0008-V-04-0, in a letter dated October 7, 2011, Southwire submitted an alternative monitoring plan for its engines applicable to this regulation. In the letter, Southwire proposed the following monitoring/permitting language modification:

> The Permittee shall carry out a measurement consisting of a minimum of three test measurements to demonstrate that the average emissions are less than or equal to the applicable standards. Each test measurement shall be a minimum of 30 minutes in length. One test measurement shall be conducted at the expected minimum ~~catalyst inlet temperature~~ engine load level for the upcoming ozone season~~, but not below 750°F on average~~, one test measurement shall be at the expected maximum ~~catalyst inlet temperature~~ engine load level for the upcoming ozone season~~, but not greater than 1,250°F on average~~, and the third test measurement shall be conducted at ~~catalyst inlet temperature in between the expected minimum and expected maximum inlet temperatures and at~~ an engine load level that is representative of normal operation and is in between the expected minimum and maximum engine load levels.

The Division Industrial Source Monitoring Program and Stationary Source Compliance Program have accepted the proposed alternative monitoring (as indicated in its letter to Southwire dated September 23, 2010).

40 CFR 63 NESHAP Subpart ZZZZ – Standards for Stationary Reciprocating Internal Combustion Engines [RICE]

As included in Permit Number 3357-045-0008-V-04-2, Southwire must install an hours meter on Engine P817 if it not equipped with one to monitor operating hours.

Equipment Groups (all subject to the same monitoring requirements):

Not Applicable.

5. Tools Assembly Products –

Individual Equipment:
Per Permit Number 3357-045-0008-V-04-5, general monitoring requirements associated with 40 CFR 63, Subpart MMMM were added for the Blade Coater..

Equipment Groups (all subject to the same monitoring requirements):

Not Applicable.

C. Compliance Assurance Monitoring (CAM)

1. Copper Rod Mill –

Per Permit Number 3351-045-0008-V-03-0, the Rod Mill Quenching and Cooling System Q467 unit has precontrolled emissions above the applicable major source threshold. Therefore, CAM is applicable to Q467 for VOC emissions.

Per Permit Number 3351-045-0008-V-03-0, VOC emissions from the rolling fluid filtration unit of the Finishing Mill segment of the rolling operation and the Quenching and Cooling activity downstream of copper rolling are captured by the Vapor Recovery System (A467) and mixed with combustion air and fuel (natural gas or propane) to be burned in the Rod Mill Shaft Furnace (F409). Due to the nature and configuration of the process, Southwire cannot install an internal temperature sensor on the furnace. Instead, Southwire is proposing to use a hand-held, infrared sensor to monitor the temperature. Southwire personnel will aim the sensor through a sight glass at one of the furnace burners and manually record the temperature. Southwire shall establish and clearly mark an area where applicable personnel are to stand and obtain the temperature. Southwire shall also establish and clearly mark the point where the hand-held instrument must be aimed. Both of the established areas must be determined as to ensure proper measurement and each are subject to the Division's review and approval. Southwire shall take and record three instantaneous temperature readings, determine the average temperature of these readings, and record it in the spreadsheet log. The Division has determined 1450 degrees Fahrenheit (^{o}F) to be an adequate minimum furnace operating temperature to destroy the VOC (predominantly isopropyl alcohol) emissions. Southwire has accepted this temperature.

In the future, should Southwire want to propose a lower minimum operating temperature, Southwire will submit sufficient testing and engineering data to support the lower value to the Division for review and approval. In the event the daily temperature falls below 1450 $^{\circ}$F or the most recent Division-approved minimum temperature, Southwire must investigate to determine the cause and perform corrective actions in a timely manner to correct the problem.

Per Permit Number 3351-045-0008-V-03-0, Periodic monitoring for Q467 established by the original Title V permit (monitoring of air flow from the Vapor Recovery System (A467) to the combustion air manifold of the Rod Mill Shaft Furnace (F409) or an ammeter to monitor the electrical current drawn by the blower as an indirect means of monitoring airflow in the Vapor Recovery System electrical current) has been replaced by the above CAM requirements. Southwire should continue to monitor these parameters as part of its Preventative Maintenance Program to ensure that the provisions of Permit Condition 8.17.1 are met.

2. Utility Products Plant –

Not Applicable.

3. Building Wire Plant –

Not Applicable.

4. MC Plant and Machine Services Group –

Per Permit Number 3449-045-0038-V-03-0, the baghouse associated with the South Shot Blasting Booth (Source Code P308) and the fabric filter associated with the Shot Peening Machine (Source Code P306) meet the definition of a control device as defined in Part 64.1. In addition, P308 and P306 are each subject to a particulate matter emission standard. The uncontrolled particulate emissions for P308 and P306 are approximately 317 tons per year and 598 tons per year, respectively. The Part 64 applicability threshold, in this case, for particulate emissions is 100 tons per year. Thus, P308 and P306 are each a Part 64 *Pollutant Specific Emission Unit* (PSEU) for Particulate Emissions. The existing Title V Permit for Southwire Company Machine Services Group does not define a *continuous compliance determination method* for the Particulate Emissions limitation for P308 or P306. Thus, Southwire Company Machine Services Group is not exempt from the requirements of Part 64 for Particulate Emissions. With that in mind, Southwire Company Machine Services Group are subject to Part 64 for Particulate Emissions.

The requirements of Part 64 do not apply to the North Spray Paint Booth (P316), the Glass Bead Shot Blasting Machine (P307), or any of the hoppers (P324, P327, P330, P334, P337, P347, and P350) because these units, although equipped with control devices, do not have potential uncontrolled emissions above the major source threshold. The remaining equipment listed in Table 3.1 of Permit Number 3349-045-0038-V-03-0 are not equipped with control devices as defined in Part 64.1.

Southwire Company Machine Services Group identified two PSEUs that are subject to CAM in their CAM plan. These sources are South Shot Blasting Booth P308 and Shot Peening Machine P306. They both have control devices to control PM emissions. P308 and P306 are controlled by a baghouse and a fabric filter, respectively. The primary indicator of proper control device operation for particulate matter is pressure drop. It has been determined that the pressure drop levels indicating acceptable performance are: for P306, a pressure drop range of one to five inches of water; and for P308, a pressure drop range of one to five inches of water.

5. Cofer Technolgy Center –

Not Applicable.

6. Corporate Energy Center –

Not Applicable.

7. Tools Assembled Products –

Not Applicable.

Permit conditions for specific monitoring requirements in Section 5.0 are summarized below.

Permit Condition in Permit Number 3357-045-0008-V-05-0	Permit Condition Number in Permit Number 3357-045-0008-V-04-0	Permit Condition Deleted, Modified or Added since issuance of Permit Number 3357-045-0008-V-04-0	Deleted Modified or Added per what Permit Number 3357-045-0008-V-04-0	Explanation of Permit Condition
Section 5.2A – Specific Monitoring Requirements [MULTI]				
-				
Section 5.2B – Specific Monitoring Requirements [BWP]				
5.2.B.1	5.2.B.1	Yes	Modified per 3357-045-0008-V-04-3 and 3357-045-0008-V-05-0.	This condition specifies monitoring for oil mist collectors. This condition was modified to add C324 as discussed above. As part of this renewal, the facility requested that the condition be changed from‘ replace and/or clean’ to ‘replace or clean’.

5.2.B.2	5.2.B.2	Yes	Modified per 3357-045-0008-V-05-0.	This condition specifies inspection requirements for the bin vent filters. As part of this renewal the facility requests to change the inspection schedule from once every three months to once every quarter. The facility also requested that the condition be changed from ‘ replace and/or clean’ to ‘replace or clean’. In addition the facility wishes to replace ‘every six months’ with ‘semiannually’.
5.2.B.3	5.2.B.3	Yes	Modified per 3357-045-0008-V-05-0.	This condition requires inspection logs for the bin filters. As part of this renewal the facility requested that the condition be changed from ‘ replace and/or clean’ to ‘replace or clean’.
Section 5.2C – Specific Monitoring Requirements [MC]				
5.2.C.1	5.2.C.1	Yes	Modified per 3357-045-0008-V-04-3 and 3357-045-0008-V-05-0.	This condition specifies monitoring for dust filter systems. This condition was modified to remove C324 as discussed above. As part of this renewal, the facility requested that the condition be changed from ‘replace and/or clean’ to ‘replace or clean’.
Section 5.2.D – Specific Monitoring Requirements [CRM]				
5.2.D.1	5.2.D.1	Yes	Modified per 3357-045-0008-V-05-0.	This condition specifies monitoring for the oil mist collector. As part of this renewal, the facility requested that the condition be changed from ‘ replace and/or clean’ to ‘replace or clean’.

5.2.D.2	5.2.D.2	No	-	This condition indicates the applicable pollutant and equipment subject to CAM.
5.2.D.3	5.2.D.3	No	-	This condition specifies the requirements of CAM.
Section 5.2E – Specific Monitoring Requirements [UPP]				
5.2.E.1	5.2.E.1	Yes	Modified per 3357-045-0008-V-04-3.	This condition requires pressure drop monitoring for P001. This condition was modified to remove C205.
-	5.2.E.2	Yes	Deleted per 3 3357-045-0008-V-05-0.	This condition has been removed since Boilers P296 and P297 have been decommissioned.
5.2.E.2	5.2.E.3	Yes	Modified per 3357-045-0008-V-05-0.	This condition requires inspection logs for the bin filters. As part of this renewal, the facility requested that the condition be changed from ‘ replace and/or clean’ to ‘replace or clean’.
5.2.E.3	5.2.E.4	Yes	Modified per 3357-045-0008-V-05-0.	This condition specifies monitoring requirements for applicable control equipment. As part of this renewal, the facility requested that the condition be changed from ‘ replace and/or clean’ to ‘replace or clean’.
5.2.E.4	5.2.E.5	No	-	This condition specifies monitoring requirements per 40 CFR 63, Subpart MMMM.
-	-	Yes	5.2.E.6 Added per 3357-045-0008-V-04-3. Deleted per 3357-045-0008-V-05-0.	This condition was removed since Boilers P296 and P297 have been decommissioned.
Section 5.2F – Specific Monitoring Requirements [MSG]				
5.2.F.1	5.2.F.1	No	-	This condition requiring applicable pressure drop monitoring.

5.2.F.2	5.2.F.2	No	-	This condition indicates the applicable pollutant and equipment subject to CAM.
5.2.F.3	5.2.F.3	No	-	This condition specifies the requirements of CAM.
5.2.F.4	5.2.F.4	No	-	This condition specifies the requirements of CAM.
Section 5.2G – Specific Monitoring Requirements [CTC]				
5.2.G.1	5.2.G.1	Yes	Modified per 3357-045-0008-V-04-3.	This condition requires opacity monitoring for the test chambers. This condition was modified to add applicable equipment.
5.2.G.2	-	Yes	5.2.G.2 Added per 3357-045-0008-V-04-3.	This condition requires scrubber flow rate monitoring for the test chambers scrubbers. This condition was added to add applicable equipment.
5.2.G.3	-	Yes	5.2.G.3 Added per 3357-045-0008-V-04-3.	This condition requires establishment of applicable parameters for the test chambers. This condition was added to add applicable equipment.
5.2.G.4	-	Yes	5.2.G.4 Added per 3357-045-0008-V-04-3.	This condition invalidates Operating Scenario One when Operating Scenario Two is implemented as discussed above. This condition was added to address this issue.
5.2.G.5	-	-	5.2.G.5 Added per 3357-045-0008-V-04-3.	This condition was added to specify monitoring per 40 CFR 63, Subpart DDDDD for P911.

Section 5.2H – Specific Monitoring Requirements [CEM]				
5.2.H.1	5..2.H.1	No	-	This condition specifies monitoring per Georgia Rule (mmm).
5.2.H.2	5..2.H.2	No	-	This condition specifies monitoring requirements per 40 CFR 63, Subpart ZZZZ.
5.2.H.3	5.2.H.3	No	-	This condition specifies monitoring requirements per 40 CFR 63, Subpart ZZZZ.
5.2.H.4	5.2.H.4	No	-	This condition specifies catalyst monitoring requirements per 40 CFR 63, Subpart ZZZZ.
5.2.H.5		Yes	5.2.H.5 Added per 3357-045-0008-V-04-2. Modified per 3357-045-0008-V-05-0.	This condition specifies hour meter requirements per 40 CFR 63, Subpart ZZZZ. This condition was modified to add P817.
-	-	Yes	5.2.H.5 Added per 3357-045-0008-V-04-2. Deleted per 3357-045-0008-V-05-0.	This condition specifies hour meter requirements per 40 CFR 63, Subpart ZZZZ. This condition was deleted since its requirements are now addressed by 4.2.H.5.
Section 4.2I – Specific Monitoring Requirements [TAP]				
5.2.I.1	-	Yes	5.2.I.5 Added per 3357-045-0008-V-04-5. Deleted per 3357-045-0008-V-05-0.	This condition was added to specify monitoring per 40 CFR 63, Subpart MMMM. This condition was modified to number it correctly.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

1. Copper Rod Mill –

Permit Number 3351-045-0008-V-02-2 established record keeping requirements to demonstrate compliance with VOC PSD and 112(g) avoidance limits.

Per Permit 3351-045-0008-V-02-3, the following permit conditions were added and or modified. Permit Conditions 6.2.13, 6.2.14, 6.2.15, and 6.2.18 were modified to add equipment CS14 located at UPP to record keeping / reporting requirements. Permit Conditions 6.2.16 and 6.2.17 were modified to include P685 at the BWP. Permit Conditions 6.2.19 and 6.2.20 were modified to add equipment P756 at the UPP to record keeping / reporting requirements. Permit Condition 6.2.23 was modified to include P756, CS14 and F476 in calculation of VOC emissions. Permit Conditions 6.2.25 through 6.2.39 were added to require record keeping and reporting associated with PM_{10} and $PM_{2.5}$ emissions limits. Permit Conditions 6.2.40 through 6.2.43 were added to require record keeping and reporting associated with the VOC, PM_{10}, and $PM_{2.5}$ emissions from Vertirod F476 located at the CRM. Permit Condition 6.2.44 was added to require lubricant usage monitoring for applicable drawing machines. Permit Condition 6.2.45 required submittal of sample records for new record keeping requirements to the Division for approval. Original Permit Conditions 6.2.10 and 6.2.45 have been satisfied, and have therefore been removed. As a result, permit conditions in Section 6.2 were renumbered.

Per Permit Number 3351-045-0008-V-03-0, Permit Condition 6.1.7 was modified to define an excursion in the operation of Furnace F409 (See CAM discussion).

2. Utility Products Plant –

Permit Number 3357-045-0052-V-01-3 established record keeping requirements to demonstrate compliance with VOC PSD and 112(g) avoidance limits.

Record keeping and reporting associated with VOC PSD avoidance limits and are still applicable with some exception. Some record keeping and reporting was subsumed by Permit 3357-045-0052-V-01-5 for modified PSD limits. Removal of 112(g) limits resulted in the removal of associated record keeping and reporting per Permit 3357-045-0052-V-01-5. Permit Number 3357-045-0052-V-01-5 also established record keeping and reporting for $PM_{10}/PM_{2.5}$ PSD avoidance limits.

Per Permit Number 3357-045-0052-V-02-1, the newly proposed Drawing Machines (Emission Units P524, P525, and P526) at SCUPP are subject to a VOC non-attainment NSR avoidance limit. In order to meet this limit, Southwire proposed to demonstrate compliance in the following manner, and the Division found this acceptable:

- Southwire will calculate VOC emissions from the applicable drawing operations based upon rod throughput for each drawing machine and emission factors developed from VOC engineering testing of drawing operations [0.03944 lb of VOC/ton input].

Per Permit Number 3357-045-0052-V-02-1, the newly proposed PE Jacket Extruder Lines (Emission Units P519 and P521) are subject to a VOC non-attainment NSR avoidance limit. In order to meet this limit, Southwire proposed to demonstrate compliance in the following manner, and the Division found this acceptable:

- Southwire will calculate VOC emissions from the applicable extrusion lines based upon plastic throughput for each extruder and emission factors developed from VOC engineering testing of extrusion operations [0.0995 lb of VOC/ton plastic for Polyvinyl Chloride (PVC), Nylon, and Polyethylene Extrusion (PE)].

The newly proposed Annealing Furnace P523 is subject to a VOC non-attainment NSR avoidance limit. In order to meet this limit, Southwire proposed to demonstrate compliance in the following manner, and the Division found this acceptable until initial performance testing is conducted:

- Southwire will calculate VOC emissions from the annealing furnace based upon charge throughput emission factors developed from VOC engineering testing of annealing furnace operations [8.25×10^{-3} lb VOC/ton charge] or the approved VOC emission factor established by performance testing].

The newly proposed CV Extrusion Lines (Emission Units P501, P504, P507, P510, P513, and P516) are subject to a VOC non-attainment NSR avoidance limit. In order to meet this limit, Southwire proposed to demonstrate compliance in the following manner, and the Division found this acceptable until initial performance testing is conducted:

- Southwire will calculate VOC emissions from the applicable extrusion lines based upon insulation throughput emission factors developed from VOC engineering testing of similar extrusion operations [0.81 lb VOC/ton insulation] or the approved VOC emission factor established by performance testing].

In addition, the CV lines are subject to a 112(g) avoidance limit. In order to meet this limit, Southwire proposed to demonstrate compliance in the following manner, and the Division found this acceptable until initial performance testing is conducted:

- Southwire will calculate individual and total HAP emissions from the applicable extrusion lines based upon insulation throughput emission factors developed from HAP engineering testing of similar extrusion operations [0.22 lb Acetophenone/ton insulation and 0.22 lb Cumene/ton insulation] or the approved HAP emission factor established by performance testing.

The newly proposed ink application systems (Emission Units P503, P506, P509, P512, P515, and P518) are subject to a VOC non-attainment NSR avoidance limit. In order to meet this limit, Southwire proposed to demonstrate compliance in the following manner, and the Division found this acceptable:

- Southwire will calculate VOC emissions from the applicable ink application systems based upon monthly usage records of all materials which will include the total weight of each material used, the weighed or calculated amount of waste material disposed, and the calculated amount of VOC contained in each material or waste (expressed as a weight percentage, or in lbs/gal). VOC emissions will be calculated using standard mass balance equations.

The Division asked if the proposed materials utilized by the ink application systems would contain HAPs in an email dated June 11, 2008. Southwire responded to this email on June 11, 2008 indicating that the proposed materials contain no HAPs listed in Section 112 of the Clean Air Act. Therefore, the ink application systems were not considered in the 112(g) avoidance limit.

Modified Permit Condition 6.1.7 requires reporting of any time any fuel fired in the annealing furnace P523 has a sulfur content greater than 2.5 percent, by weight. In addition, reporting is required if the control equipment is monitored as described in Section VI of this document above. Permit Condition 6.1.7 also defines exceedances and excursions for applicable equipment and reporting requirements.

Per Permit Number 3357-045-0052-V-02-1, Southwire is required to maintain records of NO_x or VOC emissions and make periodic reports accordingly [Georgia Rule 391-3-1-.02(6)(b)1.]. Emission statements are required for NO_x or VOC sources located in one of the 20 ozone nonattainment counties with a potential to emit 25 tons per year of either NO_x or VOC. The emission statement must indicate actual emissions of NO_x or VOC from the facility. The statement must be submitted by June 15 of every year and show applicable actual emissions from the previous calendar year [Georgia Rule 391-3-1-.02(6)(a)4.]. Permit Condition 6.1.8 was added to address this requirement.

Per Permit Number 3357-045-0052-V-02-4, Southwire will be required to keep records of the type of plastic coating on the coated parts prior to burning, and total weight, in pounds, of plastic coated parts before burn. Southwire will use this data to compute the 12 month rolling amount of residue cleaned in P786. Southwire will also be required to report any violations of applicable limits.

Per Permit Number 3357-045-0052-V-02-6, Southwire will be required to keep records of the type of plastic coating on the coated parts prior to cleaning; total weight, in pounds, of plastic coated parts before cleaning in P786; total weight, in pounds, of plastic coated parts after cleaning in P786; and the total weight, in pounds, of resulting residue from the clean parts in P786. Southwire will use this data to compute the 12 month rolling weight of residue from parts cleaned in P786. Southwire will also be required to report any violations of applicable limits.

Southwire must record the pressure drop across filter C001 on each operating day. In addition, Southwire must record the pressure drop of the filter upon replacement and record the value on the base reading as it currently does for the existing paint booth located at the UPP. As part of this renewal, the pressure drop excursion was updated to reflect facility operating parameters.

Georgia Rule 391-3-1-.02(2)(tt) – VOC Emissions from Major Sources

In addition, to demonstrate compliance with Georgia Rule (tt) the facility must maintain records specifying the VOC content of each coating material utilized in P001 either expressed in pounds of VOC per gallon of coating, excluding water, delivered to the coating applicator or pounds of VOC per gallon of coating solids delivered to the coating applicator, per Permit Number 3357-045-0052-V-02-6. In the event Southwire chooses to comply with established VOC RACT limit by the application of low solvent coating technology where the 24-hour weighted average of all coatings used meets the solids equivalent limit of 6.67 pounds of VOC per gallon of coating solids delivered to the coating applicator, then Southwire must keep (1) daily usage records of all materials utilized containing VOCs, which include the total weight of each material and the VOC content of each material and (2) use the daily usage records to calculate the 24-hour weighted average of all coatings used on each coater either expressed in pounds of VOC per gallon of coating, excluding water, delivered to the coating applicator or pounds of VOC per gallon of coating solids delivered to the coating applicator.

40 CFR 63 NESHAP Subpart MMMM – Standards for Surface Coating of Miscellaneous Metal Parts and Products

Per Permit Number 3357-045-0052-V-02-6, Southwire 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 40 CFR 63.3910(b) and (c). Southwire must submit the initial notification required by 40 CFR 63.9(b) for Paint Booth P001 no later than 120 days after initial startup [40 CFR 63.3910(b)]. Southwire must complete notification of compliance for Paint Booth P001 required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.3940 or 40 CFR 63.3950 that applies. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c)(1) through (11) and in 40 CFR 63.9(h).

Southwire must submit semiannual compliance reports for Paint Booth P001 according to the requirements of 40 CFR 63.3920(a)(1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph 40 CFR 63.3920(a)(2). Since Southwire is subject to 40 CFR 70 which already requires semiannual reporting, compliance reports for Paint Booth P001 will be on the same submittal schedule. Southwire will not be required to submit performance test reports [40 CFR 63.3920(b)] or startup, shutdown, malfunction reports [40 CFR 63.3920(c)] because Paint Booth P001 will not be equipped with add-on controls as defined by 40 CFR 63, Subpart MMMM.

Southwire must collect and keep records of the data and information specified in 40 CFR 63.3930 for Paint Booth P001. Failure to collect and keep these records is a deviation from the applicable standard. Southwire must keep records 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. Each record must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Each record must be kept on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1). Records may be off-site for the remaining 3 years [40 CFR 63.3931].

3. Building Wire Plant –

Permit Number 3357-045-0012-V-01-3 established record keeping requirements to demonstrate compliance with VOC PSD and 112(g) avoidance limits.

Record keeping and reporting associated with VOC PSD avoidance limits are discussed in detail in the narrative associated with Permit 3357-045-0012-V-01-3, and are still applicable with some exception. Some record keeping and reporting was subsumed by Permit 3357-045-0012-V-01-5 for modified PSD limits. Removal of 112(g) limits resulted in the removal of associated record keeping and reporting per Permit 3357-045-0012-V-01-5. Permit Number 3357-045-0012-V-01-5 also established $PM_{10}/PM_{2.5}$ PSD avoidance limits monitoring.

Per Permit Number 3357-045-0012-V-02-2, Southwire must demonstrate compliance with requirements to process non-PVC coated parts only in Equipment P690 and the weekly plastic compound burned off P690 limit. Southwire must maintain logs of the weight of non-PVC coated parts before and after processing in the tooling unit. In addition, the facility must maintain operating hours records for the unit. The parts weight records and operating records with be used to determine the weekly weight of non-PVC plastic compound burned off by Electric Tooling Cleaning Unit P690. In addition, Southwire must maintain records of the type coating on each part processed in the tooling unit.

Per Permit Number 3357-045-0008-V-04-4, reporting and recordkeeping requirements were updated to add P696 to existing reporting requirements for P690.

4. MC Plant and Machine Services Group –

Record keeping and reporting associated with PSD and 112(g) avoidance are discussed in detail in the narratives associated with Permit Numbers 3349-045-0008-V-02-3, 3351-045-0043-V-01-3, 3357-045-0052-V-01-3, and 3351-045-0008-02-2, and are still applicable to these sources with exception of conditions pertaining to MEK for reasons discussed in Section III.C.

To insure compliance with the applicable PM_{10} and $PM_{2.5}$ emissions limits, the Division has included the following record keeping requirements.

- Southwire will calculate PM_{10} and $PM_{2.5}$ emissions from the applicable drawing machines located at the Copper Rod Mill, Machine Services Group facility and Building Wire Plant based upon rod throughput for each drawing machine, and the developed emission factor as discussed above.

- Southwire will calculate PM_{10} and $PM_{2.5}$ emissions from the applicable pellet hopper based upon plastic throughput for each pellet hopper, and an emission factor found in the EPA FIRE Data System for PM_{10} emissions from SCC 30101899 – Plastics Production; Others Not Specified.

- Southwire will not be required to maintain material usage and monthly emission estimates for the Bucket Elevator at the CRM, the MC Armoring Lines, sixty-seven (67) lines at the Machine Services Group and eight (8) lines at the BWP, or the cooling towers at the BWP since potential emissions from each of these sources are 0.41 tons per year, 1.75 tons per year, and 1.38 tons per year, respectively. Southwire will be required, however, to include the potential emissions from these sources in its calculation of the rolling twelve-month PM_{10} and $PM_{2.5}$ emissions.

- Southwire will maintain rolling twelve-month PM_{10} and $PM_{2.5}$ emissions calculations in order to compare against the permit limits. Emissions totals will include sources from each of the applicable facilities.

- Southwire will maintain records of the name and quantity of each lubricant used on Drawing Machines P477, P643, P656, P660, P661, P682, and P332 as an indicator of what metal the equipment is processing. This is the Division's method for determining that Southwire is in compliance with the copper-only processing limit; which makes it a federally enforceable limit. Southwire shall also maintain records of the material safety data sheet for each lubricant.

40 CFR 60 NSPS Subpart TT- Standards for Metal Coil Surface Coating
To comply with the emission limit using low VOC-content coatings without the use of emission control devices or through the use of high VOC-content coatings in conjunction with emission control devices, Southwire must compute and record the average VOC content of coatings applied during each calendar month for each affected facility, according to the equations provided in 40 CFR 60.463 [40 CFR 60.464(a)] per Permit Number 3449-045-0038-V-03-1.

Southwire proposes to comply with the emissions limit through the use of low VOC – content coatings without emission control devices. Therefore Southwire must include in the initial compliance report required by §60.8 the weighted average of the VOC content of coatings used during a period of one calendar month for each affected facility [40 CFR 60.465(a)]. Following the initial performance test, Southwire must identify, record, and submit a written report to the Division every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the emission limit. If there are no instances that have occurred during a particular quarter, a report stating this must be submitted to the Division semiannually [40 CFR 60.465(c)]. Southwire must maintain records of all data and calculations used to determine monthly VOC emissions from each affected facility to determine the monthly emission limit at the facility for a period of at least two years [40 CFR 60.465(e)].

40 CFR 63 NESHAP Subpart MMMM – Standards for Surface Coating of Miscellaneous Metal Parts and Products
Per Permit Number 3357-045-0008-V-04-0, record keeping requirements discussed above as related to Paint Booth P001 located at the Utility Products Plant were added to address the applicability of this rule to existing Paint Booth P316 located at the Machine Services Group facility.

40 CFR 63 NESHAP Subpart SSSS- Standards for Surface Coating of Metal Coil
Per Permit Number 3449-045-0038-V-03-1, Southwire must demonstrate compliance with applicable standards by following the applicable procedures in §63.5170. Southwire must include all coating materials as defined in 40 CFR 63.5110 used in the affected source when determining compliance with the applicable emission limit [40 CFR 63.5170]. To demonstrate compliance with this limit, Southwire has proposed to use compliant coatings. Therefore if Southwire uses "as purchased" compliant coatings, each coating material used during the 12-month compliance period must not exceed 0.46 kg HAP per liter solids, as purchased as specified in Table 1 of 40 CFR 63.5170 and 40 CFR 63.5170(a). If Southwire uses "as applied" compliant coatings, each coating material used cannot exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly as specified in Table 1 of 40 CFR 63.5170 and 40 CFR 63.5170(b)(1); or the average of all coating materials used cannot exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly as specified in Table 1 of §63.5170 and 40 CFR 63.5170(b)(2). Southwire may apply any of the compliance options mentioned above to an individual coil coating line, or multiple lines as a group, or to the entire affected source. Southwire can use different compliance options for different coil coating lines, or at different times on the same line. However, Southwire cannot use different compliance options at the same time on the same coil coating line. If Southwire switches between the compliance options for any coil coating line or group of lines it must document this switch as require by 40 CFR 63.5190(a), and report it to the Division in the next semiannual compliance report required by 40 CFR 63.5180[40 CFR 63.5170].

Southwire must submit reports as specified in 40 CFR 63.5180(b) though (i) to the EPA Regional Office IV and the Division [40 CFR 63.5180(a)]. These reports include, but are not limited to:

- Initial notification required in §63.9(b);
- Notification of Compliance Status as specified in§ 63.9(h). Southwire must submit the Notification of Compliance Status no later than 30 calendar days following the end of the initial 12-month compliance period as described in §63.5130;
- Semi-annual compliance reports containing the information specified in 40 CFR 63.5180(g)(1) and (g)(2) and;
- Submit, for each deviation occurring when not using a CEMS to comply with the applicable standard, the semi-annual compliance report contain the information in 40 CFR 63.5180(g)(2)(i) through (iv) and the information in 40 CFR 63.5180(h)(1) through (3).

Southwire must maintain the records specified in 40 CFR 63.5190(a) and (b) in accordance with 40 CFR 63.10(b)(1).

Per Permit Number 3449-045-0038-V-03-2, Southwire is required to maintain records of NO_x or VOC emissions and make periodic reports accordingly [Georgia Rule 391-3-1-.02(6)(b)1]. Emission statements are required for NO_x or VOC sources located in one of the 20 ozone nonattainment counties with a potential to emit 25 tons per year of either NO_x or VOC. The emission statement must indicate actual emissions of NO_x or VOC from the facility. The statement must be submitted by June 15 of every year and show applicable actual emissions from the previous calendar year [Georgia Rule 391-3-1-.02(6)(a)4].

Southwire will be required to record and retain records of equipment operating hours and the number and description of parts processed in the cleaning units P360 and P527 as discussed earlier in this document. Reporting of any potential violations of applicable equipment limits for P360 and/or P527 is also required as previously discussed in this document.

40 CFR 63 NESHAP Subpart MMMM – Standards for Surface Coating of Miscellaneous Metal Parts and Products
As added per Permit Number 3357-045-0008-V-04-2, per 40 CFR 63.3930, Southwire must collect and keep records of the data and information specified in this section for Printers P361-P380. Failure to collect and keep these records is a deviation from the applicable standard. Southwire must submit semiannual compliance reports for Printers P361-P380 according to the requirements of 40 CFR 60.3920(a)(1) through 40 CFR 60.3920(7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 60.3920(a)(2). [40 CFR 60.3920(a)].

5. Cofer Technology Center –

Per Permit Number 3357-045-0043-V-01-0, Southwire is required to maintain a log which includes the date of each flame test, and these records are to be used to verify compliance.

Per Permit Number 3357-045-0008-V-04-1, Southwire must keep records of all the dates of fire tests performed in Fire Test Chamber P951. Southwire must use this information to determine the number of tests conducted in Chamber P951 during the twelve consecutive month reporting period and submit this information as part of its semiannual report.

40 CFR 63 NESHAP Subpart DDDDD – Standards for Industrial, Commercial, Institutional Boilers and Process Heaters
Per Permit Number 3357-045-0008-V-04-3, Southwire must complete all applicable notifications as required by 40 CFR 63.7545. Southwire must keep all applicable records according to 40 CFR 63.7555(a)(1) and (2). Southwire must submit a compliance report with the information in 40 CFR 63.7550(c)(5)(i) through (iv) and (xiv) [40 CFR 63.7550(c)(1)]. Per 40 CFR 63.7560, records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). Southwire must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The records must be kept on site, or they must be accessible from on-site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). Records can be kept off site for the remaining 3 years.

6. Corporate Energy Management –

Record keeping and reporting requirements for 40 CFR 63, Subpart ZZZZ have been added per Permit Number 3357-045-0051-V-2-0. Southwire must submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply by the dates specified for Waukesha Engine P800, Waukesha Engine P801, and Waukesha Engine P802 [40 CFR 63.6545(a)]. Southwire must also submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in §63.7(b)(1) for Waukesha Engine P800, Waukesha Engine P801, and Waukesha Engine P802 [40 CFR 63.6545(e)].

Southwire is required to keep the records described in paragraphs (a)(1) through (a)(3), (b)(1) through (b)(3) and (c) of §63.6655 for Waukesha Engine P800, Waukesha Engine P801, and Waukesha Engine P802, and records required in Table 6 of 40 CFR 63, Subpart ZZZZ to show continuous compliance with each applicable emission or operating limitation [40 CFR 63.6655(a) and 40 CFR 63.6655(d)]. As part of the required semiannual report, Southwire will report all information required by paragraphs (c)(1) through (c)(6) of §63.6650 and by Table 7 of 40 CFR 63, Subpart ZZZZ for Waukesha Engine P800, Waukesha Engine P801, and Waukesha Engine P802. In the event of any deviations from an operating parameter or an emission limitation, the report shall contain all information required contained in (c)(1) through (c)(7) and (e)(1) through (e)(12) of §63.6650 [40 CFR 63.6650(b)(5), 40 CFR 63.6650(c), 40 CFR 63.6650(e), 40 CFR 63.6650(f), and Table 7 of 40 CFR 63, Subpart ZZZZ].

40 CFR 60 - NSPS Subpart JJJJ – Standards for Stationary Spark Ignition Internal Combustion Engines

Per Permit Number 3357-045-0051-V-02-2, an initial notification including all information specified in 40 CFR 60.4245(c) must be submitted to the Division. Southwire must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate P804 in a manner consistent with good air pollution control practice for minimizing emissions [40 CFR 60.4243(c)]. In addition, Southwire must maintain all applicable records required by 40 CFR 60.4245(a). Southwire must also submit to the Division a copy of each performance test within 60 days after the test has been completed [40 CFR 60.4245(c)]. The same requirements were added for P805 and P806 under Permit Number 3357-045-0051-02-3.

40 CFR 63 NESHAP Subpart ZZZZ- Standards for Stationary Reciprocating Internal Combustion Engines (RICE)

Per Permit Number 3357-045-0051-V-02-2, Southwire must submit all of the notifications in 40 CFR 63.7(b) and (c), 40 CFR 63.8(e), (f)(4) and (f)(6), 40 CFR 63.9(b) through (e), (g) and (h) that apply by the dates specified for Waukesha Engine P804 [40 CFR 63.6545(a)]. Southwire must also submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in 40 CFR 63.7(b)(1) for Waukesha Engine P804 [40 CFR 63.6545(g)]. Southwire is required to keep the records described in paragraphs (a)(1) through (a)(3), and (b)(1) through (b)(3) of 40 CFR 63.6655 for Waukesha Engine P804, and records required in Table 6 of 40 CFR 63, Subpart ZZZZ to show continuous compliance with each applicable emission or operating limitation [40 CFR 63.6655(a) and 40 CFR 63.6655(d)]. As part of the required semiannual report, Southwire will report all information required by paragraphs (c)(1) through (c)(6) of 40 CFR 63.6650 and by Table 7 of 40 CFR 63, Subpart ZZZZ for Waukesha Engine P804. In the event of any deviations from an operating parameter or an emission limitation, the report must contain all information required contained in (c)(1) through (c)(6) and (e)(1) through (e)(12) of 40 CFR 63.6650 [40 CFR 63.6650(b)(5), 40 CFR 63.6650(c), 40 CFR 63.6650(e), 40 CFR 63.6650(f), and Table 7 of 40 CFR Part 63, Subpart ZZZZ]. The same requirements were added for P805 and P806 under Permit Number 3357-045-0051-02-3.

40 CFR 63 NESHAP Subpart ZZZZ –Standards for Stationary Reciprocating Internal Combustion Engines [RICE]

Per Permit Number 3357-045-0008-V-04-2, Southwire must maintain operating hours records for Engine 817 per the requirements of 40 CFR 63, Subpart ZZZZ.

Georgia Rule 391-3-1-.02(2)(mmm) NO_x Emissions from Stationary Gas Turbines and Stationary Engines used to Generate Electricity

Per 3357-045-0008-V-04-0, in a letter dated October 7, 2011, Southwire submitted an alternative monitoring plan for its engines applicable to this regulation as previously discussed in this document. As a result the excursion associated with this monitoring has been updated to reflect the revised the monitoring requirements.

7. Tools Assembled Products –

40 CFR 63, Subpart MMMM Southwire 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 40 CFR 63.3910(b) and (c). Southwire must submit the initial notification required by 40 CFR 63.9(b) for Blade Coater P970 no later than 120 days after initial startup [40 CFR 63.3910(b)]. Southwire must complete notification of compliance for Blade Coater P970 required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.3940 or 40 CFR 63.3950 that applies. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c)(1) through (11) and in 40 CFR 63.9(h).

Southwire must submit semiannual compliance reports for Blade Coater P970 according to the requirements of 40 CFR 63.3920(a)(1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph 40 CFR 63.3920(a)(2). Since Southwire is subject to 40 CFR 70 which already requires semiannual reporting, compliance reports for Blade Coating P970 will be on the same submittal schedule. Southwire will not be required to submit performance test reports [40 CFR 63.3920(b)] or startup, shutdown, malfunction reports [40 CFR 63.3920(c)] because Blade Coating P970 will not be equipped with add-on controls as defined by 40 CFR 63, Subpart MMMM. Southwire must collect and keep records of the data and information specified in 40 CFR 63.3930 for Blade Coating P970. Failure to collect and keep these records is a deviation from the applicable standard.

Southwire must keep records 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. Each record must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Each record must be kept on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1). Records may be off-site for the remaining 3 years [40 CFR 63.3931].

Permit conditions for general record keeping and reporting requirements in Section 6.1.7 are summarized below.

Permit Condition in Permit Number 3357-045-0008-V-05-0	**Permit Condition Number in Permit Number 3357-045-0008-V-04-0**	**Permit Condition Deleted, Modified or Added since issuance of Permit Number 3357-045-0008-V-04-0**	**Deleted Modified or Added per what Permit Number 3357-045-0008-V-04-0**	**Explanation of Permit Condition**
Section 6.1.7A – General Record Keeping and Reporting Requirements [MULTI]				
This condition defines excess emissions, exceedances, excursions, and other applicable reporting requirements for applicable equipment.				
Section 6.1.7B – General Record Keeping and Reporting Requirements [BWP]				
This condition defines excess emissions, exceedances, excursions, and other applicable reporting requirements for applicable equipment. This condition was modified as part of this renewal to update P154 to P154A and P154B as well as add P696.				
Section 6.1.7C – General Record Keeping and Reporting Requirements [MC]				
This condition defines excess emissions, exceedances, excursions, and other applicable reporting requirements for applicable equipment. This condition was modified to add the requirements of 6.1.C.8, which has been deleted.				
Section 6.1.7.D – General Record Keeping and Reporting Requirements [CRM]				
This condition defines excess emissions, exceedances, excursions, and other applicable reporting requirements for applicable equipment.				
Section 6.1.7.E – General Record Keeping and Reporting Requirements [UPP]				
This condition defines excess emissions, exceedances, excursions, and other applicable reporting requirements for applicable equipment. This condition was modified per 3357-045-0008-V-04-3 and as part of this renewal to remove Boilers P296 and P297 and P205. This condition was also modified to reflect updated excursion parameters for P001. Requirements of 6.1.E.8, which was added per 3357-045-0008-V-04-2, have been included in this condition as part of this renewal.				
Section 6.1..7F – General Record Keeping and Reporting Requirements [MSG]				
This condition defines excess emissions, exceedances, excursions, and other applicable reporting requirements for applicable equipment.				
Section 6.1.7G – General Record Keeping and Reporting Requirements [CTC]				
This condition defines excess emissions, exceedances, excursions, and other applicable reporting requirements for applicable equipment. This condition was modified per 3357-045-0008-V-04-3 to add applicable equipment.				

Section 6.1.7H – General Record Keeping and Reporting Requirements [CEM]
This condition defines excess emissions, exceedances, excursions, and other applicable reporting requirements for applicable equipment. Requirements of 6.1.H.8, which was added per 3357-045-0008-V-04-2, have been included in this condition as part of this renewal. As part of this renewal, this condition was updated to add exceedances for Engine P807 and P813 operation hours.
Section 6.1.7I – General Record Keeping and Reporting Requirements [TAP]
This condition defines excess emissions, exceedances, excursions, and other applicable reporting requirements for applicable equipment. This condition was added per 3357-045-0008-V-04-5.

Permit conditions for specific record keeping and reporting requirements in Section 6.0 are summarized below.

Permit Condition in Permit Number 3357-045-0008-V-05-0	**Permit Condition Number in Permit Number 3357-045-0008-V-04-0**	**Permit Condition Deleted, Modified or Added since issuance of Permit Number 3357-045-0008-V-04-0**	**Deleted Modified or Added per what Permit Number 3357-045-0008-V-04-0**	**Explanation of Permit Condition**
Section 6.2A – Specific Record Keeping and Reporting Requirements [MULTI]				
6.2.A.1	6.2.A.1	No	-	This condition requires monthly material usage records for applicable equipment.
6.2.A.2	6.2.A.2	No	-	This condition requires monthly VOC emission calculations for applicable equipment.
6.2.A.3	6.2.A.3	No	-	This condition requires monthly rod input records for applicable equipment.
6.2.A.4	6.2.A.4	No	-	This condition requires monthly VOC emission calculations for applicable equipment
6.2.A.5	6.2.A.5	No	-	This condition requires monthly plastic usage records for applicable equipment.
6.2.A.6	6.2.A.6	No	-	This condition requires monthly VOC emission calculations for applicable equipment
6.2.A.7	6.2.A.7	Yes	Modified per 3357-045-0008-V-05-0.	This condition requires monthly VOC emission calculations for applicable equipment. This condition was modified to remove the curing ovens as discussed above.
6.2.A.8	6.2.A.8	No	-	This condition requires monthly particulate emission calculations for applicable equipment.

6.2.A.9	6.2.A.9	No	-	This condition requires monthly material throughput records for applicable equipment.
6.2.A.10	6.2.A.10	No	-	This condition requires monthly particulate emission calculations for applicable equipment.
6.2.A.11	6.2.A.11	No	-	This condition requires monthly particulate emission calculations for applicable equipment.
Section 6.2B – Specific Record Keeping and Reporting Requirements [BWP]				
6.2.B.1	6.2.B.1	Yes	Modified per 3357-045-0008-V-05-0.	This condition specifies record requirements for P154A and P154B. As part of this renewal, the condition was modified to update the equipment name as discussed above.
6.2.B.2	6.2.B.2	No	-	This condition specifies record requirements for HCl emissions from applicable equipment.
6.2.B.3	6.2.B.3	No	-	This condition specifies burn hours requirements for applicable equipment.
6.2.B.4	6.2.B.4	Yes	Modified per 3357-045-0008-V-04-4.	This condition specifies record keeping requirements for applicable tool cleaning units. This condition was modified to add P696.
6.2.B.5	6.2.B.5	No	-	This condition specifies burned off plastic record keeping requirements for applicable equipment.
6.2.B.6	6.2.B.6	Yes	Modified per 3357-045-0008-V-04-4.	This condition specifies coating type record keeping requirements for applicable tool cleaning units. This condition was modified to add P696.
6.2.B.7	6.2.B.7	No	-	This condition specifies monthly throughput record keeping requirements for applicable tool cleaning units.

6.2.B.8	6.2.B.8	No	-	This condition requires monthly particulate emission calculations for applicable equipment.
6.2.B.9	6.2.B.9	No	-	This condition specifies lubricant record keeping requirements for applicable equipment. This condition was modified to add P696.
Section 6.2C – Specific Record Keeping and Reporting Requirements [MC]				
6.2.C.1	6.2.C.1	No	-	This condition specifies records for VOC content of coatings.
6.2.C.2	6.2.C.2	No	-	This condition specifies records for HAP content of coatings.
6.2.C.3	6.2.C.3	No	-	This condition specifies records for coating for P358.
6.2.C.4	6.2.C.4	No	-	This condition specifies determination of volume of coatings and mass of VOC solved added to coatings.
6.2.C.5	6.2.C.5	No	-	This condition specifies monthly VOC emissions calculations for P358.
6.2.C.6	6.2.C.6	No	-	This condition requires submittal of applicable records.
6.2.C.7	6.2.C.7	No	-	This condition requires maintenance of applicable records.
6.2.C.8	6.2.C.8	No	-	This condition requires lubricant usage records as well as lubricant MSDS's.
6.2.C.9	-	Yes	6.2.C.9 Added per 3357-045-0008-V-04-2.	This condition specifies record keeping requirements for applicable the tool cleaning unit.
6.2.C.10	-	Yes	6.2.C.10 Added per 3357-045-0008-V-04-2.	This condition specifies burned off plastic record keeping requirements for applicable equipment.
6.2.C.11	-	Yes	6.2.C.11 Added per 3357-045-0008-V-04-2.	This condition specifies coating type record keeping requirements for applicable tool cleaning units.

6.2.C.12	-	Yes	6.2.C.12 Added per 3357-045-0008-V-04-2.	This condition specifies monthly coating material VOC content for applicable printers.
6.2.C.13	-	Yes	6.2.C.13 Added per 3357-045-0008-V-04-2.	This condition specifies VOC content for applicable printers.
6.2.C.14	-	Yes	6.2.C.14 Added per 3357-045-0008-V-04-2.	This condition specifies compliance report requirements for applicable printers.
-		Yes	6.2.C.14 deleted per 3357-045-0008-V-04-3.	This condition was deleted since the initial notification of 40 CFR 63, Subpart MMMM for the applicable printers has been satisfied.
-		Yes	6.2.C.15 deleted per 3357-045-0008-V-04-3.	This condition was deleted since the initial notification of 40 CFR 63, Subpart MMMM for the applicable printers has been satisfied.
-		Yes	6.2.C.16 deleted per 3357-045-0008-V-04-3.	This condition was deleted since the initial notification of 40 CFR 63, Subpart MMMM for the applicable printers has been satisfied.
6.2.C.15	-	Yes	6.2.C.18 Added per 3357-045-0008-V-04-2.	This condition specifies record keeping requirements for applicable printers.
6.2.C.16	-	Yes	6.2.C.19 Added per 3357-045-0008-V-04-2.	This condition specifies the record keeping schedule for applicable printers.
Section 6.2.D – Specific Record Keeping and Reporting Requirements [CRM]				
6.2.D.1	6.2.D.1	No	-	This condition specifies PSD avoidance record keeping requirements for applicable equipment.
6.2.D.2	6.2.D.2	No	-	This condition specifies VOC emissions calculation requirements for applicable equipment.
6.2.D.3	6.2.D.3	No	-	This condition specifies monthly VOC emissions calculations requirements for applicable equipment.

6.2.D.4	6.2.D.4	No	-	This condition specifies monthly material usage requirements for applicable equipment.
6.2.D.5	6.2.D.5	No	-	This condition specifies monthly VOC emissions calculations requirements for applicable equipment.
6.2.D.6	6.2.D.6	No	-	This condition specifies monthly PM emissions calculations requirements for applicable equipment.
6.2.D.7	6.2.D.7	No	-	This condition specifies monthly lubricant usage requirements for applicable equipment.
Section 6.2E – Specific Record Keeping and Reporting Requirements [UPP]				
6.2.E.1	6.2.E.1	Yes	Modified per 3357-045-0008-V-05-0.	This condition requires pressure drop records for P001. This condition was modified to remove C205.
6.2.E.2	6.2.E.2	Yes	Modified per 3357-045-0008-V-05-0.	This condition requires VOC coating content records. This condition was modified to remove C205.
6.2.E.3	6.2.E.3	Yes	Modified per 3357-045-0008-V-05-0.	This condition specifies records for P001. This condition was modified to remove C205.
-	6.2.E.4	Yes	Deleted per 3357-045-0008-V-05-0.	Boilers P296 and P297 have been decommissioned. Therefore, this condition is no longer applicable.
-	6.2.E.5	Yes	Deleted per 3357-045-0008-V-05-0.	Boilers P296 and P297 have been decommissioned. Therefore, this condition is no longer applicable.
-	6.2.E.6	Yes	Deleted per 3357-045-0008-V-05-0.	Boilers P296 and P297 have been decommissioned. Therefore, this condition is no longer applicable.
6.2.E.4	6.2.E.7	No	-	This condition specifies records required for P745.

6.2.E.5	6.2.E.8	No	-	This condition specifies HCl emission calculations for P745.
6.2.E.6	6.2.E.9	No	-	This condition requires weekly burn hours records for P745.
6.2.E.7	6.2.E.10	No	-	This condition requires VOC containing material usage records for applicable equipment.
6.2.E.8	6.2.E.11	No	-	This condition requires monthly VOC emission calculations records for applicable equipment.
6.2.E.9	6.2.E.12	No	-	This condition requires rod throughput records for applicable equipment.
6.2.E.10	6.2.E.13	No	-	This condition requires monthly VOC emission calculations records for applicable equipment.
6.2.E.11	6.2.E.14	No	-	This condition requires plastic throughput records for applicable equipment.
6.2.E.12	6.2.E.15	No	-	This condition requires monthly VOC emission calculations records for applicable equipment.
6.2.E.13	6.2.E.16	No	-	This condition requires charge input records for applicable equipment.
6.2.E.14	6.2.E.17	No	-	This condition requires monthly VOC emission calculations records for applicable equipment.
6.2.E.15	6.2.E.18	No	-	This condition requires insulation throughput records for applicable equipment.

6.2.E.16	6.2.E.19	Yes	Modified per 3357-045-0008-V-04-3.	This condition requires monthly VOC emission calculations records for applicable equipment. This condition was modified based on the formulation change discussed above.
6.2.E.17	6.2.E.20	No	-	This condition requires monthly VOC emission calculations records for applicable equipment.
6.2.E.18	6.2.E.21	Yes	Modified per 3357-045-0008-V-04-3.	This condition requires monthly HAP emission calculations records for applicable equipment. This condition was modified based on the formulation change discussed above.
-	6.2.E.22	Yes	Modified per 3357-045-0008-V-04-3.	This condition was deleted as it is no longer applicable since its requirements were incorporated into another condition.
6.2.E.19	6.2.E.23	Yes	Modified per 3357-045-0008-V-04-3.	This condition requires monthly HAP emission calculations records for applicable equipment. This condition was modified based on the formulation change discussed above.
6.2.E.20	6.2.E.24	No	-	This condition specifies records required for P786.
6.2.E.21	6.2.E.25	No	-	This condition requires records of material cleaned in P786.
6.2.E.22	6.2.E.26	No	-	This condition requires monthly material burn records for P786.
-	6.2.E.27	No	-	This condition was deleted since the compliance schedule has past.
-	6.2.E.28	No	-	This condition was deleted since the compliance schedule has past.

-	6.2.E.29	No	-	This condition was deleted since the compliance schedule has past.
6.2.E.23	6.2.E.31	No	-	This condition specifies compliance report requirements for P001.
6.2.E.24	6.2.E.32	No	-	This condition specifies records requirements for P001.
6.2.E.25	6.2.E.33	No	-	This condition specifies the records retention schedule requirements for P001.
6.2.E.26	6.2.E.34	Yes	Modified per 3357-045-0008-V-05-0.	This condition requires records of material throughput for applicable equipment. This condition was modified to remove curing ovens as discussed above.
6.2.E.27	6.2.E.35	Yes	Modified per 3357-045-0008-V-05-0.	This condition requires monthly VOC emission calculations records for applicable equipment. This condition was modified to remove curing ovens as discussed above.
6.2.E.28	-	Yes	6.2.E.36 Added per 3357-045-0008-V-04-2.	This condition specifies records required for P527.
6.2.E.29	-	Yes	6.2.E.37 Added per 3357-045-0008-V-04-2.	This condition requires records of material cleaned in P527.
6.2.E.30	-	Yes	6.2.E.38 Added per 3357-045-0008-V-04-2.	This condition requires monthly material burn records for P527.
-		Yes	6.2.E.39 Added per 3357-045-0008-V-04-3. Deleted per 3357-045-0008-V-05-0.	Boilers P296 and P297 have been decommissioned. Therefore this condition is no longer applicable.
-		Yes	6.2.E.40 Added per 3357-045-0008-V-04-3. Deleted per 3357-045-0008-V-05-0.	Boilers P296 and P297 have been decommissioned. Therefore this condition is no longer applicable.

Section 6.2F – Specific Reporting and Record Keeping Requirements [MSG]				
6.2.F.1	6.2.F.1	No	-	This condition requires pressure drop reading records for applicable equipment.
6.2.F.2	6.2.F.2	No	-	This condition specifies VOC material usage records for applicable equipment.
6.2.F.3	6.2.F.3	No	-	This condition specifies coatings VOC records for P316.
-	6.2.F.4	Yes	Deleted per 3357-045-0008-V-05-0.	This condition was deleted as the compliance schedule has passed.
-	6.2.F.5	Yes	Deleted per 3357-045-0008-V-05-0.	This condition was deleted as the compliance schedule has passed.
-	6.2.F.6	Yes	Deleted per 3357-045-0008-V-05-0.	This condition was deleted as the compliance schedule has passed.
6.2.F.4	6.2.F.7	No	-	This condition specifies compliance report requirements for P316.
6.2.F.5	6.2.F.8	No	-	This condition specifies records requirements for P316.
6.2.F.6	6.2.E.9	No	-	This condition specifies the records retention schedule requirements for P316.
Section 6.2G – Specific Record Keeping and Reporting Requirements [CTC]				
6.2.G.1	6.2.G.1	Yes	Modified per 3357-045-0008-V-04-3.	This condition requires flame tests records of the test chambers. This condition was modified to add applicable equipment.
6.2.G.2	6.2.G.2	Yes	Modified per 3357-045-0008-V-04-3.	This condition requires records of the twelve month rolling total of tests in the test chambers. This condition was added to add applicable equipment.
6.2.G.3	-	Yes	6.2.G.3 Added per 3357-045-0008-V-04-1.	This condition requires records of flame tests in P951.

6.2.G.4	-	Yes	6.2.G.4 Added per 3357-045-0008-V-04-1.	This condition requires records of the twelve month rolling total of tests in P951.
6.2.G.5	-	-	5.2.G.5 Added per 3357-045-0008-V-04-3. Modified per 3357-045-0008-V-05-0.	This condition was added to require notification for the startup of Operating Scenario Two discussed above. This condition was modified to correct the permit number.
6.2.G.6	-	-	5.2.G.6 Added per 3357-045-0008-V-04-3. Modified per 3357-045-0008-V-05-0.	This condition was added to specify required records per 40 CFR 63, Subpart DDDDD for P911. This condition was modified to correct the permit number.
6.2.G.7	-	-	5.2.G.7 Added per 3357-045-0008-V-04-3. Modified per 3357-045-0008-V-05-0.	This condition was added to specify required reports per 40 CFR 63, Subpart DDDDD for P911. This condition was modified as part of this renewal to correct the permit number and to allow submittal of the compliance report in accordance with existing Title V reporting schedule as allowed by 40 CFR 63, Subpart DDDDD.
Section 6.2H – Specific Reporting and Record Keeping Requirements [CEM]				
6.2.H.1	6..2.H.1	No	-	This condition specifies operating hours records for applicable engines.
6.2.H.2	6..2.H.2	No	-	This condition specifies notification requirements per 40 CFR 63, Subpart ZZZZ.
6.2.H.3	6.2.H.3	No	-	This condition specifies performance testing notification per 40 CFR 63, Subpart ZZZZ.
6.2.H.4	6.2.H.4	No	-	This condition specifies notification of compliance requirements per 40 CFR 63, Subpart ZZZZ.

6.2.H.5	6.2.H.5	No	-	This condition specifies records per 40 CFR 63, Subpart ZZZZ.
6.2.H.6	6.2.H.6	No	-	This condition specifies the records retention schedule per 40 CFR 63, Subpart ZZZZ.
6.2.H.7	6.2.H.7	No	-	This condition specifies fuel certification requirements per 40 CFR 60, Subpart IIII.
6.2.H.8	6.2.H.8	No	-	This condition specifies maintenance plan requirements for applicable engines.
6.2.H.9	6.2.H.9	No	-	This condition specifies records per 40 CFR 60, Subpart JJJJ.
6.2.H.10	6.2.H.10	No	-	This condition specifies performance testing reporting for applicable engines.
6.2.H.11	6.2.H.11	Yes	Modified per 3357-045-0008-V-05-0.	This condition specifies records per 40 CFR 63, Subpart ZZZZ. This condition was modified to add applicable equipment.
6.2.H.12	6.2.H.12	Yes	Modified per 3357-045-0008-V-05-0.	This condition specifies records per 40 CFR 63, Subpart ZZZZ. This condition was modified to add applicable equipment.
6.2.H.13	6.2.H.13	No	-	This condition specifies records per 40 CFR 60, Subpart IIII.
-	-	Yes	6.2.H.14 Added per 3357-045-0008-V-04-2. Deleted per 3357-045-0008-V-05-0.	This condition was deleted since the requirements for P817 were added to 6.2.H.11.
	-	Yes	6.2.H.15 Added per 3357-045-0008-V-04-2. Deleted per 3357-045-0008-V-05-0.	This condition was deleted since the requirements for P817 were added to 6.2.H.12.
Section 6.2I – Specific Record Keeping and Reporting Requirements [TAP]				
6.2.I.1	-	Yes	6.2.I.1 Added per 3357-045-0008-V-04-5.	This condition was added to specify VOC content records per 40 CFR 63, Subpart MMMM.

6.2.I.2	-	Yes	6.2.I.2 Added per 3357-045-0008-V-04-5.	This condition was added to specify usage records per 40 CFR 63, Subpart MMMM.
-	-	Yes	6.2.I.3 Added per 3357-045-0008-V-04-5. Deleted per 3357-045-0008-V-05-0.	This condition was deleted since the compliance schedule has passed.
-	-	Yes	6.2.I.4 Added per 3357-045-0008-V-04-5. Deleted per 3357-045-0008-V-05-0.	This condition was deleted since the compliance schedule has passed.
-	-	Yes	6.2.I.5 Added per 3357-045-0008-V-04-6. Deleted per 3357-045-0008-V-05-0.	This condition was deleted since the compliance schedule has passed.
-	-	Yes	6.2.I.6 Added per 3357-045-0008-V-04-5. Deleted per 3357-045-0008-V-05-0.	This condition was deleted since the compliance schedule has passed.
6.2.I.3	-	Yes	6.2.I.7 Added per 3357-045-0008-V-04-5.	This condition was added to specify compliance reports per 40 CFR 63, Subpart MMMM.
6.2.I.4	-	Yes	6.2.I.8 Added per 3357-045-0008-V-04-5.	This condition was added to specify record requirements per Georgia Rule (tt).
6.2.I.5	-	Yes	6.2.I.9 Added per 3357-045-0008-V-04-5.	This condition was added to specify the record retention schedule per Georgia Rule (tt).

VII. Specific Requirements

A. Operational Flexibility

Not Applicable. No requests for operational flexibility are associated with this application.

B. Alternative Requirements

Not Applicable. No requests for alternative requirements are associated with this application.

C. Insignificant Activities

Refer to http://gatv.georgiaair.org/GATV/default.asp for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

In January 2014, Southwire installed a compound pellet storage silo (P528) at the Utility Products Plant to support operations. This unit is considered an Insignificant Activity under the Generic Emissions Group.

In January 2014, Southwire installed a 500 pound electric aluminum furnace for research and development purposes at the Southwire Continuous Rod (SCR) operations which is located near the Utility Products Plant. According to the subsequent submittal dated February 19, 2014, the furnace will not use flux material and is expected to produce negligible particulate matter. According to the February 2014 supplemental information submittal, the particulate matter emissions are estimated to be 0.02 pounds per hour and 0.09 tons per year based on an estimated 100 pound per hour aluminum throughput rate and the particulate matter emission limit of 0.40 pound of PM per ton of aluminum processed if this equipment were determined to be subject to 40 CFR 63, Subpart RRR [40 CFR 63.1505(i)(1)].

In November 2013, Southwire replaced the transformer on Electric Annealer 420-1. This unit is considered an Insignificant Activity.

D. Temporary Sources

Not Applicable. No temporary sources are added as part of this application.

E. Short-Term Activities

Not Applicable. No short-term activities are added as part of this application.

F. Compliance Schedule/Progress Reports

Not Applicable. No compliance schedule/progress reports are added as part of this application.

G. Emissions Trading

Not Applicable. No emissions trading associated with this application.

H. Acid Rain Requirements

The facility is not subject to acid rain requirements.

I. Stratospheric Ozone Protection Requirements

The standard permit condition pursuant to 40 CFR 82 Subpart F is included in Permit No, 3351-045-0008-V-05-0. These Title VI requirements apply to all air conditioning and refrigeration units containing ozone-depleting substances regardless of the size of the unit or of the source.

J. Pollution Prevention

Not Applicable. There are no pollution prevention provisions incorporated into this Title V permit.

K. Specific Conditions

Not Applicable. There are no pollution specific conditions incorporated into this Title V permit.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative