Commonwealth of Kentucky
Division for Air Quality

STATEMENT OF BASIS / SUMMARY

Title V, Construction / Operating
PERMIT ID: V-24-003
The Okonite Company, Inc.
1740 Berea Road, Richmond, Kentucky 40475
April 5, 2024
Ryan Anderson, Reviewer

Source ID: 21-151-00021
Agency Interest #: 2858
Activity ID: APE20230002

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SECTION 1 - SOURCE DESCRIPTION

SIC Code and description: 3357, Drawing and Insulating of Nonferrous Wire (communication and energy wire, except fiber optic-insulating only).

Single Source Det. ☐ Yes ☒ No If Yes, Affiliated Source AI:

Source-wide Limit ☒ Yes ☐ No If Yes, See Section 4, Table A

28 Source Category ☐ Yes ☒ No If Yes, Category:

County: Madison
Nonattainment Area ☒ N/A ☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☐ Ozone ☐ Lead

PTE* greater than 100 tpy for any criteria air pollutant ☐ Yes ☒ No
If yes, for what pollutant(s)?
☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☐ VOC

PTE* greater than 250 tpy for any criteria air pollutant ☐ Yes ☒ No
If yes, for what pollutant(s)?
☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☐ VOC

PTE* greater than 10 tpy for any single hazardous air pollutant (HAP) ☒ Yes ☐ No
If yes, list which pollutant(s): Acetophenone

PTE* greater than 25 tpy for combined HAP ☒ Yes ☐ No

*PTE does not include self-imposed emission limitations.

Description of Facility:
The Okonite Company, Inc. (Okonite) operates a non-ferrous wire drawing and insulating facility in Richmond, Kentucky. Three types of cables are produced at this facility; one with inner rubber insulation covered by plastic layer, a second cable covered with rubber insulation, and a third cable covered with Sioplas. Steam is utilized for the vulcanizing of the rubber insulation, and cross-linking of the plastic coverings. Cables are coated with applicable electrical information and manufacturing identification codes.

The primary operations at the facility can be segregated into the following categories:
- Extruding
- Vulcanizing
- Printing

Potential emissions of acetophenone, a hazardous air pollutant (HAP), from the facility will exceed ten (10) tons per year. Potential emissions for combined HAPs will exceed twenty-five (25) tons per year. Potential emissions of VOCs, the criteria pollutant emitted in the largest quantity from the facility, will not exceed 100 tons per year. However, the permittee has requested practically enforceable lmitations to restrict the facility's potential emissions to 90 tons

per year to ensure compliance, operational flexibility, and continued classification as a minor source of criteria pollutants.

SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM

Permit Number: V-24-003 Activity: APE20230002

Application Received: 8/2/2023 Application Complete: 10/1/2023

Permit Action: ☒Initial ☐Renewal ☐Significant Rev. ☐Minor Rev. ☐Administrative

Construction/Modification Requested? ☒ Yes ☐ No NSR Applicable? ☐ Yes ☒ No

Previous 502(b)(10) or Off-Permit Changes incorporated with this permit action ☐ Yes ☒ No

Description of Action:
Okonite applied for an initial Title V permit on August 2, 2023. The application was submitted based on concerns from the facility that the calculated rolling 12-month acetophenone emissions would exceed the federally enforceable limitation of 9 tons per year set in permit F-20-009 when operated at the capacity needed to meet production needs. Under this initial Title V permit, Okonite will become a major source for Hazardous Air Pollutants (HAP), by removing the federally enforceable limitation for acetophenone present in F-20-009. However, the permittee has requested to retain the federally enforceable limit of 90 tons per year for VOC emissions.

Additionally, Okonite plans to modify Emission Unit 2.1, adding new extrusion equipment to EPs 808, 809, 7301 and 7302.

The initial Title V permit will include the following revisions from permit F-20-009:

- **Emission Unit 2.1:** Removal of EP 807
- **Emission Unit 2.1:** Modification of the Continuous Vulcanization (CV) Rubber Extrusion Lines. Additional extrusion equipment will be added EU 2.1. The additional equipment will increase the maximum capacity of EU 2.1 to approximately 138,000 tons per year.
- **Emission Unit 4.1:** Removal of one inkjet printer (IJ 3) and one offset printer (OP 1)
- **Emission Unit 7.1:** Removal of Boiler #1
- **Emission Unit 7.6:** Removal of the Front Office Boiler
- Modification of Insignificant Activity 2. Lacquer will no longer be applied to line 7870 and line 7837. Lacquer will be applied to line 7815
- Removal of Lines 804 and 812 from Insignificant Activity 5
- Removal of individual hazardous air pollutant (HAP), Acetophenone limit.
- Addition of 40 CFR 63 Subpart DDDDD for emission units EU 7.3, 7.4 & 7.5
- Update of permit language and requirements.

Summary of All Affected Facilities Used to Determine 401 KAR 59:015 Emission Limits								
EU	Fuel(s)	Capacity (MMBtu /hr)	Constructed	Basis for PM Limit	Total Heat Input Capacity for PM Limit (MMBtu/ hr)	Basis for SO_2 Limit	Total Heat Input Capacity for SO_2 Limit (MMBtu/hr)	Notes
7.1	Natural Gas; #2 Fuel Oil	21	1969	Unit was subject to 401 KAR 61:015				Removed in permit V-24-003
7.2	Natural Gas; #2 Fuel Oil	21	1969	Unit was subject to 401 KAR 61:015				Removed in 2018
7.6	Natural Gas	1.8	1986	Section 4(1)(c)	43.8	Section 5(1)(c)2.	43.8	Removed in permit V-24-003
8	Natural Gas	5.184 each	1998	Section 4(1)(c)	64.536	Section 5(1)(c)2.	64.536	Added in permit F-20-009
7.3	Natural Gas	19.67	2006	Section 4(1)(c)	84.206	Section 5(1)(c)2.	84.206	
7.4	Natural Gas	12.553	2016	Section 4(1)(c)	117.722	Section 5(1)(c)2.	117.722	
7.7	Natural Gas	2.8 each	2016	Section 4(1)(c)	117.722	Section 5(1)(c)2.	117.722	
7.8	Natural Gas	2	2016	Section 4(1)(c)	117.722	Section 5(1)(c)2.	117.722	
7.9	Natural Gas	3.521 each	2016	Section 4(1)(c)	117.722	Section 5(1)(c)2.	117.722	
7.5	Natural Gas; #2 Fuel Oil	21	2018	Section 4(1)(b)	117.722	Subject to 40 CFR 60 Subpart Dc		Added after 7.2 was removed

V-24-003 Emission Summary				
Pollutant	2022 Actual (tpy)	Previous PTE V-24-003 (tpy)	Change (tpy)	Revised PTE V-24-003 (tpy)
CO	3.96	42.55	-8.22	34.33
NOx	3.745	46.47	-9.80	36.67
PT	0.412	1.44	2.18	3.62
PM_{10}	0.412	4.36	-0.74	3.62
$PM_{2.5}$	0.388	4.11	-0.75	3.36
SO_2	0.029	0.31	-0.06	0.25
VOC	23.56	42.97	26.93	69.90
Lead	$1.66 * 10^{-5}$	2.6E-04	-5.3E-05	2.07E-04
Greenhouse Gases (GHGs)				
Carbon Dioxide	5,826	61,514	-11,749	49,765
Methane	0.076	1.18	-0.24	0.94
Nitrous Oxide	0.076	1.13	-1.04	0.09
CO_2 Equivalent (CO_2e)	5,851	61,880	-12,063	49,817
Hazardous Air Pollutants (HAPs)				
Acetophenone	10.45	12.64	12.35	24.99
Combined HAPs:	11.24	20.03	8.06	28.09
Non-HAP Air Toxic Pollutants				
Alpha-Methylstyrene	3.45	4.13	4.61	8.74
Cyclohexanone	0.40	2.04	--	2.04
Dimethyl Benzyl Alcohol	5.05	5.70	10.51	16.21
Methyl Ethyl Ketone	0.51	2.07	--	2.07

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

Emission Unit 2.1 (EPs 808, 809, 830, 831, 832, 7301, 7302) - CV Rubber Extrusion Operation

Initial Construction and/or Modification Date:
Emission Points 808 & 809 installed in 1969; modified in 2024
Emission Points 830 & 831 installed in 1969
Emission Point 832 installed in 2013
Emission Points 7301 & 7302 installed in 2016; modified in 2024

Process Description:
EU 2.1 is the continuous vulcanization (CV) rubber extrusion operation. Steam is utilized to vulcanize the rubber insulation.
Maximum Capacity: 137,985 tons/year
Control Device: None

Applicable Regulation:

State-Origin Requirement:
401 KAR 63:020, *Potentially hazardous matter or toxic substances.* Applies to acetophenone and alpha-methylstyrene emissions.

Comments: Emission factors for the CV rubber extrusion/vulcanizing operation of lines 808, 809, 830, 831, 832, 7301, and 7302 were found through source testing in 2008, and are based on the total product weight, rather than the type of material processed. The following emission factors in lb/tons 0.614, 0.103, 0.235, and 0.276 are for VOC, alpha-methylstyrene, dimethyl benzyl alcohol, and acetophenone respectively. The total potential emissions are based on the total process weight of the extrusion lines. EP 807 removed in permit V-24-003. EPs 808, 809, 7301, 7302 modified in 2024.

Emission Unit 2.2 – Cooling Tower				
Pollutant	**Emission Limit or Standard**	**Regulatory Basis for Emission Limit or Standard**	**Emission Factor Used and Basis**	**Compliance Method**
PM	• P≤0.5 tons/hr: E=2.34 lb/hr • P≤30 tons/hr: E=3.59P^0.62 • P≥30 tons/hr: E=17.31P^0.16	401 KAR 59:010, Section 3(2)	0.0017 lb/MMgal; AP-42 Chapter 13.4-1	Assumed when using mist eliminators & operating properly
Opacity	20% opacity	401 KAR 59:010, Section 3(1)(a)	N/A	Weekly qualitative visual observation & recordkeeping

Initial Construction and/or Modification Date: 2010

Process Description:
Steam vulcanizes the cable produced by the CV process line. Cold water injected into the end of the CV process line cools the cable, prior to further processing in the plant. Waste water collects in the common pit at the end of the CV line. A pump transfers the heated water to the two cell cooling tower, for recycle back to the CV line.
Model: The Cooling Tower Company, TCI-1110-15-1
Maximum Capacity: 323 MMgal/yr
Control Device: Mist Eliminator

Applicable Regulation:
401 KAR 59:010, *New process operations*. Applicable to any affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulates in 401 KAR 59, commenced on or after July 2, 1975

State-Origin Requirement:
401 KAR 63:020, *Potentially hazardous matter or toxic substances*. Applies to acetophenone and alpha-methylstyrene emissions.

Precluded Regulations:
401 KAR 63:002, Section 2(4)(j), 40 CFR 63.400 to 63:407, Table 1 (Subpart Q), *National Emission Standards for Hazardous Air Pollutants for Industrial Cooling Towers* Precluded because the industrial process cooling tower does not use chromium based water treatment chemicals.

Comments:
Emission factors were established through emission tests performed at Okonite's Santa Maria, CA plant in 2008 on similar processes. Process weight rate (P) for 401 KAR 59:010, Section 3(2), is the total CV line process rate (EU 2.1).

Emission Unit 3.1 (EPs 810, 880, 890, 891, 7860, 7866) – Plastic Extrusion Lines & Vulcanizers				
Pollutant	**Emission Limit or Standard**	**Regulatory Basis for Emission Limit or Standard**	**Emission Factor Used and Basis**	**Compliance Method**
PM (EPs 880, 890, 891, 7860, & 7866)	•P≤0.5 tons/hr: E=2.34 lb/hr •P≤30 tons/hr: E=3.59P^0.62	401 KAR 59:010, Section 3(2)	0.00138 lb/tons Applicant	Assumed when properly operated & maintained
PM (EP 810)	• P≤0.5 tons/hr: E=2.58 lb/hr • P≤30 tons/hr: E=4.10P^0.67	401 KAR 61:020, Section 3(2)(a)	0.00138 lb/tons Applicant	Assumed by complying with 401 KAR 59:010
Opacity (EPs 880, 890, 891, 7860, & 7866)	20% opacity	401 KAR 59:010, Section 3(1)(a)	N/A	Weekly qualitative visual observation, & recordkeeping
Opacity (EP 810)	40% opacity	401 KAR 61:020, Section 3(1)(a)	N/A	Weekly qualitative visual observation, & recordkeeping

Initial Construction and Modification Dates:
Plastic extrusion lines 810, 890, and 880 were installed in 1969, 1988, and 1998 respectively;
Plastic extrusion line 891 was installed in 2008;
Vulcanizers 7860 and 7866 were installed in 1977 and 2008 respectively.

Process Description:
Two different types of product are produced by the four plastic extrusion lines. Lines 810 and 890 produce a power cable by applying a plastic layer of Sioplas over the wire conductor. Lines 880 and 891 produce a second power cable with an insulation layer of rubber over the wire conductor, and an outer extruded plastic covering. Large reels of electric power cables are produced by the continuous plastic extrusion process lines. Diameter of the reel (6-10 ft) and of the electric power cable, dictate the total length of the cable. Reels are transported to the vulcanizers once they are full. The batch rubber vulcanization process takes any period of 8-24 hours to complete, depending on the thickness of either the rubber or plastic covering.

Emissions from the vulcanization process either exit through two 3" blow down tank exhausts or through the areas room exhaust fans. After the reels are placed into the vulcanizers, the doors are sealed shut, and steam is injected into the chamber to maintain the required pressure during the curing cycle. Steam is constantly injected into the chamber, to compensate for a lose of volume and internal pressure due to condensing steam. To avoid an over-pressurized chamber, a popoff relieve valve will occasionally release steam. Steam is sent to the blow down tanks at the end of each cycle, and condensate from the blow down tank is sent to the sewers. The doors of the chamber are opened when the internal pressure reaches atmospheric levels. Some steam will escaped when the doors are opened. No control device is used to reduce the emissions.

Maximum Capacities:
Plastic Extrusion: 49660 tons/year
PVC Extrusion: 2500 tons/year
Sioplas extrusion: 16680 tons/year

Emission Unit 3.1 (EPs 810, 880, 890, 891, 7860, 7866) – Plastic Extrusion Lines & Vulcanizers

Control Device: None

Applicable Regulations:
401 KAR 59:010, *New process operations.* Applies to each affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulates in this chapter commenced on or after July 2, 1975. Applies to the vulcanizer 7860 and 7866; and lines 880, 890, and 891.
401 KAR 61:020, *Existing process operations.* Applies to each affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulates in this chapter, commenced before July 2, 1975. Applies to line 810.

State-Origin Requirement:
401 KAR 63:020, *Potentially hazardous matter or toxic substances.* Applies to hydrogen chloride, vinyl chloride, and methanol emissions.

Comments:
Emissions depend on the total weight of PVC extrusion, Sioplas extrusion and all plastic extrusion. The emission factors are from original permitting actions.

Emission Unit 4.1 (EPs IJ4 – IJ15 & OP2 – OP12) – Cable Printing Processes

Initial Construction Date:
Emission Points OP2 – OP10 installed 1983 to 2013;
Emission Points OP11 & OP12 installed July 2016;
Emission Points IJ4 – IJ11 installed 1999 to 2013;
Emission Points IJ12 & IJ13 installed July 2016;
Emission Points IJ14 & IJ15 installed in 2019

Process Description:
There are a total of twenty-three (23) emission points, which includes twelve (12) inkjet printers (Identified with IJ), and eleven (11) offset printers (Identified with OP). Cables are coated with applicable electrical information at the print lines. Cables are printed with manufacturer identification codes at the inkjet printers. The printers are portable within the plant.
Maximum Capacities:
Ink: 1000 gallons/year
Thinner: 1200 gallons/year
Control Device: None

Applicable Regulation:

State-Origin Requirement:
401 KAR 63:020, *Potentially hazardous matter or toxic substances.* Applies to cyclohexanone, ethylbenzene, methyl ethyl ketone, toluene, and xylene emissions.

Comments:
Usage data and MSDS for CFX00 Black, 6500WT, 900 Black, 900 Red, 900 Orange, 900 Blue, 900 Yellow, 900 Brown, WTG1860, BKG1661, MK-10, and MK-33 were used to calculate emissions.

Emission Unit 4.1 (EPs IJ4 – IJ15 & OP2 – OP12) – Cable Printing Processes
In permit F-20-009, Emission Unit 4.1 had a total of 25 emission points. One offset printer, OP1, and one inkjet printer, IJ3, have been removed from the facility, reducing the total number of emission points from 25 to 23.

Emission Units 7.3, 7.4, & 7.5 – Boilers #3, #4, & #5				
Pollutant	**Emission Limit or Standard**	**Regulatory Basis for Emission Limit or Standard**	**Emission Factor Used and Basis**	**Compliance Method**
PM	EU 7.3 - 0.34 lb/MMBtu EU 7.4 - 0.31 lb/MMBtu EU 7.5 - 0.31 lb/MMBtu	401 KAR 59:015, Section 4(1)(c)	1.9 lb/MMscf; AP-42 Chapter 1.4	Assumed when burning Natural Gas; When burning #2 Fuel Oil in EU 7.5: Monthly calculation, monitoring, & recordkeeping
Opacity	20% opacity for all units	401 KAR 59:015, Section 4(2)	N/A	Weekly qualitative visual observations & recordkeeping
SO_2 (fuel oil #2)	EU 7.5 – 0.5 lb/MMBtu	40 CFR Subpart Dc, 60.42c(d)	0.71 lb/MMscf; AP-42 Chapter 1.3	Monthly calculation, monitoring, & recordkeeping
SO_2 (natural gas)	EU 7.3 - 1.25 lb/MMBtu EU 7.4 - 1.09 lb/MMBtu EU 7.5 - 1.09 lb/MMBtu	401 KAR 59:015, Section 5(1)(c)(2)	0.6 lb/MMscf; AP-42 Chapter 1.4	Assumed when burning Natural Gas

Process Description:

Emission Unit	Unit Name	Maximum Capacity (MMBtu/hr)	Fuels (primary/ Secondary)	Clayton Industries Boiler Model	Construction Commenced
7.3	Boiler #3	19.67	NG/none	SE-504	2006
7.4	Boiler #4	12.55	NG/none	EG-304-5	2016
7.5	Boiler #5	21	NG/diesel	EOG504-5-FGR	2018

These three natural gas fired boilers provide steam for process heating and building heat. Boilers #3 and #4 are only configured for burning natural gas and are not capable of burning alternate fuels. Boiler #5 primarily burns natural gas, except during times of curtailment or supply interruption, when #2 fuel oil may be burned. These units are uncontrolled.

Applicable Regulations:

401 KAR 59:015, *New indirect heat exchangers*. Applies to each indirect heat exchanger having a heat input capacity greater than one (1) MMBtu/hr, commenced on or after April 9, 1972.

401 KAR 60:005, Section 2(2)(d), 40 CFR 60.40c to 60.48c (Subpart Dc), *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.* Applies to each steam generating unit with a maximum design heat input capacity greater than 10 MMBtu/hr, and less than 100 MMBtu/hr, commenced after June 9, 1989.

Emission Units 7.3, 7.4, & 7.5 – Boilers #3, #4, & #5

401 KAR 63:002, Section 2(4)(iiii), 40 C.F.R. 63.7480 to 63.7575, Tables 1 to 13 (Subpart DDDDD), *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.* Applies to new, reconstructed, or existing industrial, commercial, and institutional boilers and process heaters located at major sources of hazardous air pollutants

Comments:
40 CFR 63, Subpart DDDDD, added to applicable regulations in permit V-24-003. 40 CFR 63, Subpart JJJJJJ is no longer precluded as it applies to boilers at area sources of HAPs.
Emission Units 7.3, 7.4 & 7.5 are considered existing boilers or process heaters for the purposes of 40 CFR 63, Subpart DDDDD. Existing units must be in compliance with 40 CFR 63, Subpart DDDDD, within 3 years after the source becomes a major source (See 40 CFR 63.7495(c)(2)).

Emission Units 7.7, 7.8, 7.9, & 8.0 – New Indirect Heat Exchangers

Pollutant	Emission Limit or Standard	Regulatory Basis for Emission Limit or Standard	Emission Factor Used and Basis	Compliance Method
PM	EU 7.7 - 0.31 lb/MMBtu EU 7.8 - 0.31 lb/MMBtu EU 7.9 - 0.31 lb/MMBtu EU 8.0 - 0.36 lb/MMBtu	401 KAR 59:015, Section 4(1)(c)	1.9 lb/MMscf; AP-42, Chapter 1.4	Assumed when burning Natural Gas
Opacity	20%	401 KAR 59:015, Section 4(2)	N/A	Assumed when burning Natural Gas
SO_2	EU 7.7 - 1.09 lb/MMBtu EU 7.8 - 1.09 lb/MMBtu EU 7.9 - 1.09 lb/MMBtu EU 8.0 - 1.40 lb/MMBtu	401 KAR 59:015, Section 5(1)(c)(2.)	0.6 lb/MMscf; AP-42, Chapter 1.4	Assumed when burning Natural Gas

Process Description:

Emission Unit	Emission Points	Maximum Capacity (MMBtu/hr)	Fuel Type	Construction Commenced
7.7	MAU 1, 2, & 3	2.8 Each	Natural Gas	2016
7.8	MAU 5	2.0	Natural Gas	2016
7.9	MAU 6, 7, & 8	3.521 Each	Natural Gas	2016
8.0	MAU 9, 10, 11, & 12	5.2 Each	Natural Gas	1998

Eleven makeup air handler units. These units are uncontrolled.

Applicable Regulation:
401 KAR 59:015, *New indirect heat exchangers.* Applies to each indirect heat exchanger having a heat input capacity greater than one (1) MMBtu/hr, commenced on or after April 9, 1972.

State-Origin Requirement:
401 KAR 63:020, *Potentially hazardous matter or toxic substances.*
Comments: Emission Unit 7.6, Front Office Boiler, has been removed from the facility.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)

Testing Requirements\Results

The source, at the time of initial Title V permit V-24-003, has not been required to perform any testing.

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS

Table A - Group Requirements:

Emission and Operating Limit	Regulation	Emission Unit
90 tpy of VOC emissions	To preclude major source status for VOCs under 401 KAR 52:020	Source-wide

Table B - Summary of Applicable Regulations:

Applicable Regulations	Emission Unit
401 KAR 59:010, *New process operations.* Applicable to any affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulates in 401 KAR 59, commenced on or after July 2, 1975	EU 2.2, 3.1,
401 KAR 59:015, *New indirect heat exchangers*. Applicable to each indirect heat exchanger having a heat input capacity greater than one (1) MMBtu/hr, commenced on or after April 9, 1972.	EU 7.3, 7.4, 7.5, 7.7, 7.8, 7.9, 8.0
401 KAR 60:005, Section 2(2)(d), 40 C.F.R. 60.40c to 60.48c (Subpart Dc), *Standards for Small Industrial-Commercial-Institutional Steam Generating Units*. Applicable to each steam generating unit with a maximum design heat input capacity greater than 10 MMBtu/hr, and less than 100 MMBtu/hr, commenced after June 9, 1989.	EU 7.3, 7.4, 7.5
401 KAR 61:020, *Existing process operations*. Applicable to each affected facility or source, associated with a process operation, which is not subject to another emission standard with respect to particulates in this chapter, commenced before July 2, 1975. Applies to line 810.	EU 3.1
401 KAR 63:002, Section 2(4)(iiii), 40 C.F.R. 63.7480 to 63.7575, Tables 1 to 13 (Subpart DDDDD), *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters*	EU 7.3, 7.4, 7.5
401 KAR 63:020, *Potentially hazardous matter or toxic substances.*	EU 2.1, 2.2, 3.1, 4.1, 7.1, 7.7, 7.8, 7.9, 8.0

Table C - Summary of Precluded Regulations:

Precluded Regulations	Emission Unit
401 KAR 63:002, Section 2(4)(j), 40 C.F.R. 63.400 to 63.407, Table 1 (Subpart Q), *National Emition Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers.* Precluded because the industrial process cooling tower does not use chromium based water treatment chemicals	EU 2.2

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS (CONTINUED)

Table D - Summary of Non Applicable Regulations:

N/A

Air Toxic Analysis

401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*
The Division for Air Quality (Division) has performed modeling using SCREEN View on April 6, 2015 of potentially hazardous matter or toxic substances (acetophenone, alpha methylstyrene, cyclohexanone, ethylbenzene, hydrogen chloride, methanol, methyl ethyl ketone, toluene, vinyl chloride, and xylenes) that may be emitted by the facility based upon the process rates, material formulations, stack heights and other pertinent information provided by the applicant. Based upon this information, the Division has determined that the source is in compliance with the requirements of 401 KAR 63:020.

Single Source Determination
N/A

SECTION 5 - PERMITTING HISTORY

Permit	Permit Type	Activity#	Complete Date	Issuance Date	Summary of Action	PSD/Syn Minor
O-75-99	Initial Operating Pernit	N/A	2/6/1974	7/17/1975	Operation of two 21 MM-Btu/hr Boilers	N/A
O-83-183	Operating	N/A	8/8/1983	10/28/1983	Added process lines for wire tinning, cable coating, cladding lines with degreaser and welders, and extruders	N/A
C-90-117	Construction	N/A	6/13/1990	7/6/1990	Added 3 coating line cable washing.	N/A
C-92-137	Construction	N/A	8/24/1992	10/15/1992	Added Extruder Parts Cleaner w/ Afterburner	N/A
C-93-073	Construction	N/A	3/8/1993	5/13/1993	Added a paint line and 3 stranders/extruders	N/A
F-99-027	Initial	N/A	2/2/1997	11/22/1999	Initial Federally Enforced Cond. Major for HAP and VOC, Added Ink jet printers	N/A
F-99-027 R1	Revision	N/A	11/19/2001	12/5/2001	Install and Maintain 3 absorbent applicators on one line	N/A
S-04-062	Initial	APE20040001	5/13/2004	1/31/2005	Initially a conditional major application was submitted. However, elimination of HAP's and paint usage reductions in the facility qualify the plant for a state origin permit.	N/A
S-04-062 R1	Revision	APE20050001	8/20/2006	10/15/2005	Addition of a new boiler, boiler #3 EU 7.3	N/A
S-04-062 R2	Revision	APE20110002	2/24/2012	--	Wastewater evaporator installation	N/A
F-15-008	Initial	APE20140001	1/28/2015	5/22/2015	Initial Conditional Major Permit	N/A
F-15-008 R1	Minor Revision	APE20150002	10/7/2015	10/16/2015	Addition of Lines 7301 & 7302 & Removal of line 807	N/A

F-15-008 R2	Minor Revision	APE20170001	1/26/2017	2/3/2017	Addition of Wire Drawing Line 7102 & Reinstatement of line 807	N/A
F-15-008 R3	Minor/ Sig Revision	APE20180001 / APE20190001	12/21/2018; 4/30/2019	7/21/2019	Removal of EU 1.1, 5, 7.2, EPs IJ1 & IJ2; Add EU 7.5 and EPs IJ14 & IJ15 & insignificant activites	N/A
F-20-009	Renewal	APE20190003	1/9/2020	7/1/2020	Renewal of Operating Permit	N/A

SECTION 6 – PERMIT APPLICATION HISTORY:

None.

APPENDIX A – ABBREVIATIONS AND ACRONYMS

AAQS – Ambient Air Quality Standards
BACT – Best Available Control Technology
Btu – British thermal unit
CAM – Compliance Assurance Monitoring
CO – Carbon Monoxide
Division – Kentucky Division for Air Quality
ESP – Electrostatic Precipitator
GHG – Greenhouse Gas
HAP – Hazardous Air Pollutant
HF – Hydrogen Fluoride (Gaseous)
MSDS – Material Safety Data Sheets
mmHg – Millimeter of mercury column height
NAAQS – National Ambient Air Quality Standards
NESHAP – National Emissions Standards for Hazardous Air Pollutants
NO_x – Nitrogen Oxides
NSR – New Source Review
PM – Particulate Matter
PM_{10} – Particulate Matter equal to or smaller than 10 micrometers
$PM_{2.5}$ – Particulate Matter equal to or smaller than 2.5 micrometers
PSD – Prevention of Significant Deterioration
PTE – Potential to Emit
SO_2 – Sulfur Dioxide
TF – Total Fluoride (Particulate & Gaseous)
VOC – Volatile Organic Compounds