

AIR CP_105726418_20170302_CP_INVESTIGATION_1400553
City of El Paso Environmental Services Department
Investigation Report

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Customer: Southwire Company, LLC
Customer Number: CN605104082

Regulated Entity Name: COLEMAN CABLE

Regulated Entity Number: RN105726418

Investigation # 1400553

Incident Numbers

Investigator: DENISE ESCALANTE

Site Classification CASE-BY-CASE

Conducted: 03/02/2017 -- 03/02/2017

SIC Code: 3357

NAIC Code: 331420

Program(s): AIR NEW SOURCE PERMITS

Investigation Type: Site Assessment

Location: 7911 Hoover Dr, El Paso, TX

Additional ID(s): 139273

Address: 7811 HOOVER AVE,
EL PASO, TX , 79912

Local Unit: CITY OF EL PASO LOCAL PROGRAM

Activity Type(s): PMS116ON - AIR PMS116ON - ON
SITE CH 116 PERMIT SITE REVIEW

Principal(s):

Role	Name
RESPONDENT	SOUTHWIRE COMPANY LLC

Contact(s):

Role	Title	Name	Phone
REGULATED ENTITY MAIL CONTACT	E.I.T.	MS MIYAH CALHOUN	Phone (512) 239-1262 Fax (512) 239-1330 Work (512) 239-1262
REGULATED ENTITY CONTACT	ENVIRONMENTAL MANAGER	ALBERT GARCIA	Office (915) 858-7475

Other Staff Member(s):

Role	Name
Investigator	AL MELERO
Supervisor	AL MELERO

Associated Check List

Checklist Name

AIR PERMITS REQUEST FOR COMMENTS AND
NSR PERMIT CONDITION

Unit Name

139273

Investigation Comments:

RECEIVED

4/11/2017

CENTRAL FILE ROOM

INTRODUCTION

On February 28, 2017, the Air Quality Program received a Request for Comments (RFC) from the Texas Commission on Environmental Quality (TCEQ) Air Permits Division (APD) for Permit No. 139273. The permit will authorize Southwire Company LLC to operate the non-ferrous wire drawing, insulating, and printing operation at a facility located at 7811 Hoover Ave., in El Paso Texas.

The purpose of the permit review was to address applicability and enforceability issues with regard to language in the permit under Special Conditions, Compliance Determination Conditions, and Operational Limitations. On March 3, 2017, Denise Escalante, and Al Melero, Code Compliance Officers, for the City of El Paso, Environmental Services, Air Quality Program, conducted a Permit Review Investigation to provide comments with regard to new permit application for a copper wire production and insulation facility.

Investigative Narrative

On March 1, 2017, Investigators contacted, Albert Garcia, Environmental Manager, for Southwire Company and requested a site visit.

On March 2, 2017 at approximately 1:00 p.m., officers arrived at the referenced site and met with Mr. Garcia. Officers conducted a walkthrough of plant and observed that equipment for which the permit was intended. There were no discrepancies found between the information in the permit application and the paint spraying equipment.

The following information was evaluated: Compliance Determinations Conditions, Record Keeping, and Operational Requirements.

Compliance Determination Conditions: Page 4. Recordkeeping

Part 12 B. (1) under recordkeeping states that the facility must record daily total gallons of each ink, paint, and solvent used in each coater and printer. The regulated entity representative asked if tracking could be changed to a monthly record instead of daily record. The Local Program does not have objections to the proposed change if the TCEQ Permits Division allows the change.

Operational Limitations: Page 2. Operating limitations: Under Equipment and Maximum Speed

- I. Maximum Speed (feet per minute) of the GEM Type S-3 Speed Marker is 3,500 ft./m not 600 ft. /min.
- II. Maximum Speed of the Ring Marker RS 70 is 3,900 ft. /min not 3,500 ft. /min
- III. Maximum Speed of the SP-10 Direct Contact Printer is 600 ft. /min not 3,500 ft. /min.

GENERAL FACILITY AND PROCESS INFORMATION

Southwire Company draws non-ferrous wire, insulates it, and then operates a printing operation.

BACKGROUND

Compliance History

See electronic attachments, Central Registry for compliance history rating and performance classification for the regulated entity.

Current Enforcement Actions

There are no current enforcement actions against the regulated entity.

Agreed Orders, Court Orders, and Other Compliance Agreements:

None in the previous five years.

Complaints

None in the previous five years.

PERMIT ISSUANCE: The site visit did not reveal any concerns. Proceed with permit issuance.

The RFC was e-mailed to Miyah Calhoun on March 6, 2017. Ms. Calhoun incorporated the proposed changes suggested by the Air Quality Program.

No Violations Associated to this Investigation

Signed

Denise Escalante
Environmental Investigator

Date 4-12-17

Signed

[Signature]
Supervisor

Date 4/14/17

Attachments: (in order of final report submittal)

___ Enforcement Action Request (EAR)

___ Letter to Facility (specify type) : _____

Investigation Report

___ Sample Analysis Results

___ Manifests

___ Notice of Registration

___ Maps, Plans, Sketches

___ Photographs

___ Correspondence from the facility

☒ Other (specify) :

Confirmation of site review

Investigation Quality Assurance Appendix

Investigation Number: 1400553 Regulated Entity Number: RN105726418 County: EL PASO

Regulated Entity Name: COLEMAN CABLE

Physical Address: 7911 Hoover Dr, El Paso, TX

Conducted: 03/02/2017 00:00 To 03/02/2017 00:00

Notification Date: 03/01/2017

No Associated Incidents

Staff Tasks

INVESTIGATOR AL MELERO

Tasks: 1 hrs. INVEST
1 hrs. TRAVEL

LEAD INVESTIGATOR DENISE ESCALANTE

Tasks: 1 hrs. INVEST
1 hrs. POSTINVEST
1 hrs. TRAVEL

No Documents Received

No Communication History

<u>Fiscal Year</u>	<u>WP Local Unit</u>	<u>Activity Type</u>	<u>Event Quantity</u>
2017	CITY OF EL PASO LOCAL F	PMSI116ON - AIR PMSI116ON - ON SITE CH 116 PERMIT SITE REVIEW	1

**Request for Comments -- Draft Permit
RESPONSE**

TO: Ms. Miyah Calhoun, Austin

FROM: Region: 6 City: El Paso County: El Paso Account No.:

Copy of Application Received by your Office: X_ YES NO Date Received: _____

COMPANY NAME: Southwire Company Llc

PERMIT NO.: 139273

REGULATED ENTITY NO: RN105726418

PROJECT NO.: 249438

Investigator's/Compliance Officer's Name (Please Print): Denise Escalante & Al Melero

Phone: 915-274-3293 Al Melero

Comments Deadline (from pg. 1): March 14, 2017

Date of Last Site Visit: 03/02/2017

COMMENTS ON CONDITIONS: (Please mark up draft special conditions with your comments. Please address applicability and enforceability. List any additional conditions below):

Please note that the scope of the review is typically limited to the affected sources within the project, although suggestions to improve the enforceability of conditions not related to the specific permit action may be provided with justification. Please also note that changes in permit stringency during a renewal process must meet the criteria of Texas Health and Safety Code 382.055(e) and should be submitted with justification.

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III. Maximum Speed of the SP-10 Direct Contact Printer is 600 ft. /min not 3,500 ft. /min.

GENERAL COMMENTS: The site visit conducted on March 02/2017 did not reveal any concerns other than the comments mentioned above

PERMIT ISSUANCE:

If you have any objections to issuance, please note them here:

No objections, proceed with Permit changes.

Engineer's Comments:

Project Overview

Southwire Company, LLC (Southwire) recently acquired the Coleman Cable, LLC non-ferrous wire drawing, insulating, coating, and printing operation located in El Paso, El Paso County. Coleman Cable is an existing facility that has historically operated under various Permit By Rules (PBRs), including 30 TAC 106.418 and 106.433 for printing presses and surface coating, respectively. Due to projected growth in production rates, Southwire has submitted a permit application to request authorization for the printing and surface coating operations. All other operations will remain authorized under the relevant PBR.

Additionally, Southwire is authorizing planned maintenance, startup, and shutdown (MSS) activities for its manufacturing operations using a combination of PBRs and de minimis claims which are listed in Attachment I. None of the authorizations for the planned MSS activities at this site require registration. The allowable emission rates listed on the MAERT include planned MSS activities.

Emission Summary

Upon approval, the allowable emissions will be as follows:

Air Contaminant	Proposed Allowable Emission Rates (tpy)
VOC	35.2
Exempt Solvent	0.17
HAPs	<10 (individual)/<25 (total)

Process/Project Description

The facility manufactures insulated copper cable. The operations covered under this permit include the application of coating to the wire and printing of bands and text to the coated wire.

Large reels of copper wire and rod are received by truck. Wire is either received as the desired size or the rod goes through various drawing and annealing machines to be drawn to size. Drawn wire is then sent to either one of three continuous vulcanizing (CV) lines, eight polyvinyl chloride (PVC) lines, or the silicone extrusion line, where the corresponding plastics ethylene vinyl acetate (EVA) pellets are melted and extruded onto the copper wire to form an insulated wire. The silicone insulated wire is then coated with a fiberglass yarn and coated with an insulating urethane lacquer. All heating elements are electric.

Urethane and lacquer is received in 55 gallon drums and stored in the chemical storage area. One 55 gallon drum of urethane and lacquer is placed near the coating process and is fed through pipes to a reservoir or manifold where it is mixed for the coating process. The insulated wire runs through and dips into the urethane and lacquer reservoir or manifold where it is coated. The insulated and/ or coated wire is either stored and shipped as-is or can be sent jacketed through one of twelve plastic extrusion lines where PVC extrusion lines are equipped with ink jet and or contact wheel printers that print identifying information onto the finished product.

All inks are received in one gallon containers and stored in non-flammable storage cabinets in designated areas away from the process. Each extrusion line uses a one gallon container which is connected to the printer or poured into the printer reservoir. The extender is received in 55 gallon drums and stored in the chemical storage area. The extender is hand pumped into squirt bottles or printer reservoirs and mixed with the inks inside the printer reservoir. Used shop towels are placed in designated containers near the process lines and sent for laundering.

MSS activities at the site are authorized by a combination of de minimis claims and PBRs. A review of the activities identified in the permit special conditions indicates that the identification of activities is appropriate for this type of facility. None of the authorizations for the planned MSS activities at this site require registration. All of the newly-identified planned MSS activities at the site are authorized under a permit by rule (30 TAC Chapter 106) or as a De Minimis source (30 TAC § 116.119) and are included as Attachment I.

OPERATING SCHEDULE: Continuous? Y

Hours/Day 24 Days/Week 7 Weeks/Year 52 Night Operation? Y

Melero, Albert

From: Miyah Calhoun <miyah.calhoun@tceq.texas.gov>
Sent: Wednesday, March 22, 2017 2:00 PM
To: Melero, Albert
Subject: RE: RFC for Southwire Company Llc Project No. 249439

Albert,

Thank you for your comments on the draft permit for Southwire. I will be sending the project forward to proceed with issuance with your incorporated changes regarding the changes to the represented equipment and monthly recordkeeping.

--Miyah

Miyah Calhoun, E.I.T.
Texas Commission on Environmental Quality
Air Permits Division | MACC Coatings Team
512.239.1262 | miyah.calhoun@tceq.texas.gov

From: Melero, Albert [<mailto:MeleroAX@elpasotexas.gov>]
Sent: Monday, March 06, 2017 3:24 PM
To: Miyah Calhoun
Cc: Jesus Chavez; Jon Williams; Escalante, Denise; Carrasco, Danny G.
Subject: RFC for Southwire Company Llc Project No. 249439

Good Afternoon Ms. Calhoun

Attached is the RFC for Southwire Company. Please see comments in the Recordkeeping and the Operational Limitations for specifics.

Thank you

Al Melero
Code Compliance Supervisor
City Of El Paso – Air Quality Program
Environmental Services
Ph: (915)212-6038 Cell: (915)274-3293
albert.melero@elpasotexas.gov

