

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY

SITE OPERATING PERMIT (SOP) RENEWAL

Permit #:	O2067	Company:	Encore Wire Corporation
Project #:	32994	Site:	McKinney Facility
Regulated Entity #:	RN100219419	Application Area:	McKinney Facility
Region:	4	Customer #:	CN601485238
NAICS Code:	331420	County:	Collin
Permit Reviewer:	Theo Ezeji	NAICS Name:	Copper Rolling Drawing Extruding and Alloying

SITE INFORMATION

Physical Location: 1329 Millwood Road
Nearest City: McKinney
Major Pollutants: CO
Additional FOPs: None

PROJECT SUMMARY

Encore Wire Corporation – McKinney Facility, is a copper rolling drawing extruding and alloying facility subject to the requirements of 30 TAC Chapter 122. The Federal Operating Permit (FOP #O2067) was last renewed on August 31, 2017. TCEQ received a timely renewal application on December 13, 2021. In this renewal, Special Terms and Conditions were updated, 4 new units were added, and 3 existing units were removed from the SOP. Significant emission sources at the site include tanks, basins, degreasers, backup generators, cooling towers, and rod mill vessels. The emission sources are subject to state and/or federal regulations. The applicant submitted the necessary forms (OP-1, OP-2, OP-SUMR, OP-ACPS, OP-CRO1, OP-REQ1, OP-REQ2, OP-PBRSUP and unit attribute forms OP-UA2, OP-UA3 and OP-UA13) to accomplish this renewal.

PROCESS DESCRIPTION

Pure copper rod (99.9% pure) is stretched into wire, in wire drawing machines. An aqueous drawing solution consisting of primarily water (93-98%) with an emulsified drawing oil circulates through the wire drawing machines for cooling purposes. The drawing solution is recirculated through concrete basins where water and drawing oil makeup occurs, and copper fines from the drawing machines settle out.

After the wire is drawn, it is heat-treated in annealers. All annealers are electric-heated. A small amount of annealing cooling fluid circulates through the machines. The heat-treated wire is routed to the insulating/jacketing extruders where plastic pellets and nylon pellets are extruded around the wire (plastic and nylon extruded in separate steps). The wire may be cabled or stranded prior to the addition of insulated wrapping. Also, a portion of the wire may be shipped as bare product. For some of the product that is insulated, a colorant pellet is added to the plastic prior to extrusion. As with the annealers, all extruders are electric-heated. An intermediate step for a portion of the wire includes the wrapping of the insulated wire with paper prior to adding additional insulation.

Following insulation, the product is cooled and then routed to roll-type or laser printers where a label is applied. Printing ink and solvent-based thinners are used as the labeling materials. The finished wire is then coiled onto spools for shipment.

TECHNICAL REVIEW

Permit Content Summary

1. Was Periodic Monitoring (PM) required and included in the permit?..... Yes
2. Was Compliance Assurance Monitoring (CAM) required and included in the permit?..... No
3. Was case-by-case PM or CAM included in the permit?..... No
4. Was a permit shield requested?..... Yes
5. If a permit shield was requested, was any permit shield request denied?..... No
6. Identify if the following are applicable for this project:
 - (a) Manually built applicable requirements..... No
 - (b) Customized Special Terms and Conditions..... Yes
 - (c) Manual changes to the IMS-generated applicable requirements..... No
 - (d) Alternate means of compliance for any emission unit/source at the site..... No
7. Is the site subject to the requirements of 40 CFR Part 72 (Acid Rain Permit)?..... No

8. Did the applicant's review/comments on the working draft permit result in changes to the permit content?..... Yes
9. Will the draft permit be sent to public notice with unresolved issues (i.e., disagreements with applicant)?..... No

Permit reviewer notes:

- * The existing special term and condition for 30 TAC Chapter 113, Subchapter C, §113.1090 incorporation by reference of 40 CFR Part 63, Subpart ZZZZ remains in the permit.
- * Requested new 30 TAC Chapter 115, Storage of VOCs, and 40 CFR Part 60, Subpart Kb permit shields for unit IDs: PL4RXBAS3, PL7CUBAS1, and PL7CUBAS2 were reviewed and added to the permit.
- * Existing permit shields were reviewed and are maintained.
- * Existing periodic monitoring summaries added with PM Option No. PM-V-052, for 30 TAC Chapter 115, Degreasing Processes (unit IDs: DEG1E, DEG1W, DEG2E, DEG2W, DEG3E, DEG3W and DEG4E), are still valid and included in the permit. Also, existing periodic monitoring summaries added with PM Option Nos. PM-V-047 and PM-V-048, for 30 TAC Chapter 115, Storage of VOCs (unit ID: TANK1E), are still valid and included in the permit. Within the existing periodic monitoring summaries, there are no Case-by-Case PM. No new monitoring was added during this renewal.
- * Emission Unit ID: SERVEN was added with applicable requirements for 40 CFR Part 63, Subpart ZZZZ, and 40 CFR Part 60, Subpart JJJJ.
- * Initially, the applicant requested to add unit IDs: PL7CTWR1 and PL7CRWR2 with MACT Q applicability on the OP-UA13 form. This could not be implemented as this rule is applicable only to sites with HAPs as a major pollutant. This Site is not listed as a major source for HAPs as per applicant. Therefore, MACT Q is not applicable, and the unit entries were denied. Also, due to this discovery, existing unit IDs: PL6CTWR1, PL6CTWR2 and PL4CTWR1 previously listed on the OP-UA13 form for MACT Q were removed by applicant's request.
- * Applicant submitted updated OP-SUMR form to remove unit IDs: PL7EXTRUD, PL7ANNEAL, PL7PRINT and P7DIEOV previously listed with no applicable forms on the OP-SUMR. These units are classified as off permit units with no applicability as per applicant.
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The applicant provided WDP comments which resulted in the following changes:

- o Unit IDs: PL4RXBAS3, PL7CUBAS1 and PL7CUBAS2 were removed from the Applicable Requirements Summary on the OP-UA3 form and transferred to the OP-REQ2 form. These units are process vessels and not considered storage vessels as per applicant.
- o Permit shields for 30 TAC Chapter 115, Storage of VOCs, were requested and granted for unit IDs: PL4RXBAS3, PL7CUBAS1 and PL7CUBAS2.

Statement of Basis

A Statement of Basis sets forth the legal and factual basis for the applicable requirements that are included in the FOP. A Statement of Basis was prepared for this project and is included in the permit file.

Compliance History Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on March 28, 2022.
 Site rating: 0.00 / High Company rating: 0.00 / High
(High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)
2. Has the permit changed on the basis of the compliance history or site/company rating?..... No

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS?..... No
2. Is a compliance plan and schedule included in the permit?..... No

Delinquent Fee Check

1. The delinquent fee check was performed on March 28, 2022.
2. Were there any delinquent fees owed? No

Public Notice Information

1. Were comments received from the applicant after the draft permit was mailed and before Public Notice was Published?..... No
2. Was a revised draft permit or public notice authorization package (PN-Errata) sent for any reason?..... No
3. Publication date: May 1, 2022. Newspaper name: McKinney Courier Gazette
4. Was bilingual public notice published?..... Yes

Publication date: **May 4, 2022.**

Newspaper name: **AL-DIA**

5. Were comments received during Public Notice period?..... No
(a) Was a public hearing requested?..... No
(b) Was a public hearing held?..... No
(c) Was the public hearing request withdrawn?..... No
(d) Was permit content changed as a result of any public comments?..... No
6. Was re-publication necessary?..... No

Permit reviewer notes:

The Chief Clerk's database was checked on June 29, 2022. No comments were received.

EPA Review

1. Did EPA comment on the draft permit?..... No
2. Was a separate NOPP - Notice of Proposed Permit sent to the EPA?..... No
If yes, did the EPA comment on the proposed permit?..... No
3. Were any changes made to the permit after the EPA Review Period?..... No
If yes, were these changes made within the 60-day Public Petition Period?..... No

Permit reviewer notes:

The Chief Clerk's database was checked on June 29, 2022. No comments were received.

IMPORTANT MILESTONES

Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	12/13/2021	
Date Project Received by Engineer	12/15/2021	
Technical Review Period	02/14/2022	03/23/2022
Working Draft Permit Reviewed by Applicant	03/08/2022	03/23/2022
Date PNAP/Draft Permit Mailed	04/08/2022	
Public Notice Comment Period	05/01/2022	06/01/2022
EPA Review Period	05/10/2022	06/24/2022
Date Sign Posting Certification Received	06/10/2022	

EFFECTIVE PERMIT ISSUANCE DATE: July 7, 2022



06/29/2022

Theo Ezeji
Permit Reviewer
Operating Permits Section
Air Permits Division

Date

06/29/2022

Elizabeth Moorhead
Team Leader

Date

Operating Permits Section
Air Permit Division

CONTACT INFORMATION

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