UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

JUN 23 2005

(AE-17J)

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William J. Barkey, President and COO
Rea Magnet Wire Division
Rea Magnet Wire Company, Inc.
2800 Concord Road
Lafayette, Indiana 47909

Re: Finding of Violation
Rea Magnet Wire Company, Inc.
Lafayette, Indiana

Dear Mr. Barkey:

The United States Environmental Protection Agency is issuing the enclosed Finding of Violation (FOV) to Rea Magnet Wire Company, Inc. (Rea Magnet) under Section 113(a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(3). We find that you are violating the Lafayette's facility's Title V permit.

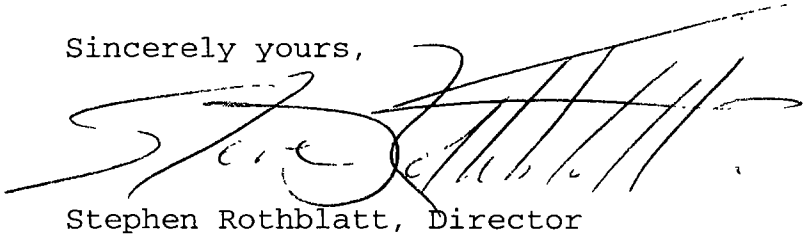
Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action. The options we select may depend on, among other things, the length of time you take to achieve and demonstrate continuous compliance with the rules cited in the FOV.

We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply, and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Kushal Som. You may call him at (312) 353-5792 to request a conference. You should make the request as soon as possible, but no later than 10 calendar days after you receive this letter. We should hold any conference within 30 calendar days of your receipt of this letter.

Sincerely yours,



Stephen Rothblatt, Director
Air and Radiation Division

cc: David McIver, Chief
IDEM Air Enforcement

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	)	
	)	
Rea Magnet Wire Company, Inc.	)	**FINDING OF VIOLATION**
Lafayette, Indiana	)	
	)	**EPA-5-05-12-IN**
	)	
Proceedings Pursuant to	)	
the Clean Air Act, 42 U.S.C.	)	
§ 7401 et seq.	)	
	)	

FINDING OF VIOLATION

The United States Environmental Protection Agency (U.S. EPA) finds that Rea Magnet Wire Company, Inc. (Rea Magnet), is violating the conditions of its Title V Permit as follows:

Statutory and Regulatory Background

1. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the CAA, no source subject to Title V may operate except in compliance with a Title V permit.

2. Section 113(a)(3) of the Act, 42 U.S.C. § 7413(a)(3), authorizes the Administrator to initiate an enforcement action whenever, among other things, the Administrator finds that any person has violated or is in violation of a requirement or prohibition of Title V of the CAA, or any rule promulgated, issued, or approved under Title V of the CAA.

3. The regulation at 40 C.F.R. § 70.6(b)(1) specifies that all terms and conditions in a permit issued under a Title V program are enforceable by U.S. EPA under the CAA.

4. U.S. EPA granted final interim approval of the Indiana Title V program on November 14, 1995 (60 Fed. Reg. 57191), and the program became effective on December 14, 1995. U.S. EPA granted final full approval to the Indiana Title V program on December 4, 2001 (66 Fed. Reg. 62969), which became effective on November 30, 2001.

Facility Facts and Discussion

5. Rea Magnet owns and operates a magnet wire facility at 2800 Concord Road, Lafayette, Indiana (Rea Magnet Lafayette facility).

6. Indiana Department of Environmental Management (IDEM) issued Title V permit No. T157-6960-00032 to the Rea Magnet Lafayette facility on February 18, 1999, pursuant to the Indiana Title V program. IDEM issued a modified Title V permit No. T157-11787-00032 to the Rea Magnet facility on February 20, 2001, pursuant to the Indiana Title V program. (Rea Magnet Title V permit).

7. The Rea Magnet Lafayette facility includes, or has included, fifteen oven unit numbers: 401-404, 429-432, 437-440, 475, 476, 479, 480, 715-716, 601-612, 613-624, 625-632, 817-824 and 839. Note: According to the April 6, 2005, Rea Magnet Section 114 response letter, Ovens 475 and 476 were later re-equipped and re-numbered 469-472 and 473-474.

8. The Rea Magnet Title V permit defines ovens 401-404, 429-432, 437-440, 475, 476, 479, 480, 715-716, 601-612, 613-624, 625-632, 817-824 and 839 as emission units. Note: According to the April 6, 2005, Rea Magnet Section 114 response letter, Ovens 475 and 476 were later re-equipped and re-numbered 469-472 and 473-474.

9. The Rea Magnet Title V permit at Section D.2, D.4, D.6, D.8, D.9, D.14 and D.16, states that ovens 401-404, 429-432, 437-440, 469-472, 473-474, 479, 480, 715-716, 601-612, 613-624, 625-632, 817-824 and 839 consist of the following equipment:

   A. A GEM gas-fired wire enameling oven with an integral internal thermal oxidizer, unit number 401-404, with a maximum rating of 31.68 thousand feet per hour, and also controlled by an add-on thermal incinerator;

   B. A GEM gas-fired wire enameling oven with an integral internal thermal oxidizer, unit number 429-432, with a maximum rating of 31.68 thousand feet per hour, and also controlled by an add-on thermal incinerator;

   C. A GEM gas-fired wire enameling oven with an integral internal thermal oxidizer, unit number 437-440, with a maximum rating of 31.68 thousand feet per hour, and also controlled by an add-on thermal incinerator;

D. A V-22 gas-fired wire enameling oven with an integral internal thermal oxidizer, unit number 475, with a maximum rating of 72 thousand feet per hour;

E. A V-22 gas-fired wire enameling oven with an integral internal thermal oxidizer, unit number 476, with a maximum rating of 72 thousand feet per hour;

F. A V-22 gas-fired wire enameling oven with an integral internal thermal oxidizer, unit number 479, with a maximum rating of 72 thousand feet per hour;

G. A V-22 gas-fired wire enameling oven with an integral internal thermal oxidizer, unit number 480, with a maximum rating of 72 thousand feet per hour;

H. An SEL electric wire enameling oven with an integral internal thermal oxidizer, unit number 715-716, with a maximum rating of 92.28 thousand feet per hour;

I. An NEMG gas-fired wire enameling oven with an integral internal thermal oxidizer, unit number 601-612, with a maximum rating of 140.40 thousand feet per hour;

J. An NEMG gas-fired wire enameling oven with an integral internal thermal oxidizer, unit number 613-624, with a maximum rating of 140.40 thousand feet per hour;

K. An NEM electric wire enameling oven with an integral internal thermal oxidizer, unit number 625-632, with a maximum rating of 48.24 thousand feet per hour;

L. An SEM electric wire enameling oven with an integral internal thermal oxidizer, unit number 817-824, with a maximum rating of 190 thousand feet per hour;

M. A MAG HES-5 electric wire enameling oven with an integral internal thermal oxidizer, unit number 839, with a maximum rating of 40.93 thousand feet per hour.

10. Rea Magnet's Title V permit at D.2.3(a) requires that the integral internal thermal oxidizers and add-on thermal incinerators associated with the 401-404, 429-432 and 437-440 ovens operate with an overall efficiency of not less than 98.5 percent at all times when the wire enameling ovens are in operation.

11. The Rea Magnet Title V permit at D.2.3(c) requires that the add-on thermal oxidizers, associated with the 401-404, 429-432 and 437-440 ovens, be operated at or above 1250 degrees Fahrenheit to maintain a 98.5 percent overall efficiency.

12. The Rea Magnet Title V permit at D.4.3(d) requires that the basecoat volatile organic compound (VOC) content of enamel applied to aluminum or copper wire for use in electric machinery, associated with the 475, 476, 479 and 480 ovens, shall not exceed 5.57 pounds VOC per gallon of coating less water.

13. Rea Magnet's Title V permit at D.6.3(a) requires that the integral internal thermal oxidizers, associated with the 715-716 ovens, operate with an overall efficiency of not less than 98.5 percent at all times when the wire enameling ovens are in operation.

14. The Rea Magnet Title V permit at D.6.3(c) requires that the add-on thermal oxidizers, associated with the 715-716 ovens, be operated at or above 1234 degrees Fahrenheit to maintain a 98.5 percent overall efficiency.

15. The Rea Magnet Title V permit at D.8.3(d) requires that the basecoat volatile organic compound (VOC) content of enamel applied to aluminum or copper wire for use in electric machinery, associated with the 601-612 and 613-624 ovens, shall not exceed 5.57 pounds VOC per gallon of coating less water.

16. The Rea Magnet Title V permit at D.9.3(c) requires that the integral internal thermal oxidizers, associated with the 625-632 ovens, be operated at or above 1250 degrees Fahrenheit to maintain a 98.5 percent overall efficiency.

17. The Rea Magnet Title V permit at D.14.3(c) requires that the integral internal thermal oxidizers, associated with the 817-824 ovens, be operated at or above 1150 degrees Fahrenheit to maintain a 98.5 percent overall efficiency.

18. The Rea Magnet Title V permit at D.16.3(c) requires that the integral internal thermal oxidizers, associated with the 839 ovens, be operated at or above 966 degrees Fahrenheit to maintain a 98.5 percent overall efficiency.

Finding of Violation

19. On April 6, 2005, the Rea Magnet facility submitted information that responded to a Section 114 Information Request regarding the 401-404, 429-432 and 437-440 ovens. According to this letter, the following table indicates the number of hours that each oven's incinerator remained below 1250 degrees Fahrenheit, in violation of the Rea Magnet Title V permit at D.2.3(c):

Oven	Date	Description	Hours
401-404	4/21-22/01	Below 1250°F	24
401-404	8/16/01	Below 1250°F	3
429-432	5/14/01	Below 1250°F	8
437-440	10/23/00	Below 1250°F	1.75

20. On April 6, 2005, the Rea Magnet facility submitted information that responded to a Section 114 Information Request regarding the 469-472, 473-474, 475, 476, 479 and 480 ovens. According to this letter, the following table indicates the number of gallons of basecoat enamel that each oven utilized, that exceeded the 5.57 pound VOC per gallon limit in D.4.3(d), in the Rea Magnet Title V permit:

Oven	Date	Description	Gallons
469-472	2002	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	48 gal.
469-472	2003	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	48 gal.
469-472	2004	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	48 gal.
473-474	2002	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	76 gal.
473-474	2003	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	76 gal.

473-474	2004	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	76 gal.
475	2000	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	65 gal.
475	2001	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	65 gal.
476	2000	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	65 gal.
479	2000	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	65 gal.
479	2001	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	65 gal.
479	2002	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	65 gal.
479	2003	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	55 gal.
479	2004	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	55 gal.
480	2000	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	65 gal.
480	2001	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	65 gal.
480	2002	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	65 gal.
480	2003	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	55 gal.

480	2004	Use of 966 Polyester basecoat @ 5.73 lb/gal exceeds 5.57 lb/gal limit	55 gal.

21. On April 6, 2005, the Rea Magnet facility submitted information that responded to a Section 114 Information Request regarding the 715-716 ovens. According to this letter, the following table indicates the number of hours that each oven's thermal oxidizer remained below 1234 degrees Fahrenheit, in violation of the Rea Magnet Title V permit at D.6.3(c):

Oven	Date	Description	Hours
715-716	3/20/02	Below 1234°F	17

22. On April 6, 2005, the Rea Magnet facility submitted information that responded to a Section 114 Information Request regarding the 601-612 and 613-624 ovens. According to this letter, the following table indicates the number of gallons of basecoat enamel that each oven utilized, that exceeded the 5.57 pound VOC per gallon limit in D.8.3(d) of the Rea Magnet Title V permit:

Oven	Date	Description	Gallons
601-612	2000	966 Polyester basecoat @ 5.7 lb/gal	56.7
601-612	2001	966 Polyester basecoat @ 5.7 lb/gal	56.7
601-612	2002	966 Polyester basecoat @ 5.7 lb/gal	56.7
601-612	2003	966 Polyester basecoat @ 5.7 lb/gal	56.7
601-612	2004	966 Polyester basecoat @ 5.7 lb/gal	56.7
613-624	2000	966 Polyester basecoat @ 5.7 lb/gal	55.6
613-624	2001	966 Polyester basecoat @ 5.7 lb/gal	55.6
613-624	2002	966 Polyester basecoat @ 5.7 lb/gal	55.6
613-624	2003	966 Polyester basecoat @ 5.7 lb/gal	55.6
613-624	2004	966 Polyester basecoat @ 5.7 lb/gal	55.6

23. On April 6, 2005, the Rea Magnet facility submitted information that responded to a Section 114 Information Request regarding the 625-632 ovens. According to this letter, the following table indicates the number of hours

that each oven's thermal oxidizer remained below 1250 degrees Fahrenheit, in violation of the Rea Magnet Title V permit at D.9.3(c):

Oven	Date	Description	Hours
625-632	6/5/01	Below 1250°F	7
625-632	9/26/01	Below 1250°F	6

24. On April 6, 2005, the Rea Magnet facility submitted information that responded to a Section 114 Information Request regarding the 817-824 ovens. According to this letter, the following table indicates the number of hours that each oven's thermal oxidizer remained below 1150 degrees Fahrenheit in violation of the Rea Magnet Title V permit at D.14.3(c):

Oven	Date	Description	Hours
817-824	3/4-6/01	Below 1150°F	44
817-824	1/4-5/03	Below 1150°F	23.25

25. On April 6, 2005, the Rea Magnet facility submitted information that responded to a Section 114 Information Request regarding the 839 ovens. According to this letter, the following table indicates the number of hours that each oven's thermal oxidizer remained below 966 degrees Fahrenheit in violation of the Rea Magnet Title V permit at D.16.3(c):

Oven	Date	Description	Hours
839	7/22-23/01	Below 966°F	29

Rea Magnet's operation in violation of its Title V permit constitutes a violation of Section 502 of the Clean Air Act, and of 40 C.F.R. § 70.7(b).

6/23/2005

Date

Stephen Rothblatt, Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Betty Williams, certify that I sent a Finding of Violation, No. EPA-5-05-12-IN, by Certified Mail, Return Receipt Requested, to:

William J. Barkey, President and COO
Rea Magnet Wire Division
Rea Magnet Wire Company, Inc.
2800 Concord Road
Lafayette, Indiana 47909

I also certify that I sent copies of the Finding of Violation by first class mail to:

Jennifer Dorn, Inspector
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, Room 1001
Indianapolis, Indiana 46206-6015

and

David McIver, Chief
Office of Enforcement Air Section
Indiana Department of Environmental Management
100 North Senate Avenue, Room 1001
Indianapolis, Indiana 46206-6015

on the 24th day of June, 2005.

Betty Williams

Betty Williams, Secretary
AECAS, (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 7001 0320 0006 0795 3055