

West Virginia Department of Environmental Protection

*Earl Ray Tomblin
Governor*

Division of Air Quality

*Randy C. Huffman
Cabinet Secretary*

Permit to Modify



R13-1479C

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:

Wheeling-Nisshin, inc.

Follansbee

009-00023

*John A. Benedict
Director*

Issued: **DRAFT** • Effective: **DRAFT**

This permit will supercede and replace Permit R13-1479B issued on December 31, 2002.

Facility Location: Follansbee, Brooke County, West Virginia
Mailing Address: Penn & Main Streets, PO Box 635, Follansbee, WV 26037
Facility Description: Coil Coating Facility
NAICS Codes: 332812
UTM Coordinates: 534.346 km Easting • 4,464.008 km Northing • Zone 17
Permit Type: Modification
Desc. of Change: Addition of a new coater and dryer to the Aluminizing and Galvanizing Line (AGL), removal of equipment from the permit that is no longer at the facility, and institution of hours of operation restrictions on existing natural gas combustion sources.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

This permit does not affect 45CSR30 applicability, the source is a nonmajor source subject to 45CSR30.

Table of Contents

1.0. Emission Units	3
2.0. General Conditions	4
2.1. Definitions	4
2.2. Acronyms	4
2.3. Authority	5
2.4. Term and Renewal	5
2.5. Duty to Comply	5
2.6. Duty to Provide Information	5
2.7. Duty to Supplement and Correct Information	6
2.8. Administrative Permit Update	6
2.9. Permit Modification	6
2.10. Major Permit Modification	6
2.11. Inspection and Entry	6
2.12. Emergency	6
2.13. Need to Halt or Reduce Activity Not a Defense	7
2.14. Suspension of Activities	7
2.15. Property Rights	7
2.16. Severability	8
2.17. Transferability	8
2.18. Notification Requirements	8
2.19. Credible Evidence	8
3.0. Facility-Wide Requirements	9
3.1. Limitations and Standards	9
3.2. Monitoring Requirements	9
3.3. Testing Requirements	10
3.4. Recordkeeping Requirements	11
3.5. Reporting Requirements	11
4.0. Source-Specific Requirements	13
4.1. Limitations and Standards	13
4.2. Monitoring Requirements	16
4.3. Testing Requirements	17
4.4. Recordkeeping Requirements	17
APPENDIX A	19
CERTIFICATION OF DATA ACCURACY	20

1.0 Emission Units⁽¹⁾

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
1S	1E	Non-Oxygen Furnace (AGL)	1986	50.3 mmBtu/hr	None
2S	2E	Radiant Tube Furnace (AGL)	1986	17.0 mmBtu/hr	None
3S	3E	Gavanneal (AGL)	1986	20.5 mmBtu/hr	None
4S		Aluminum Premelt (AGL)	1986	6.96 mmBtu/hr	None
6S	5E	Strip Dryer (AGL)	2002	3.0 mmBtu/hr	None
11S	10E	Non-Oxygen Furnace (CGL)	1986	30.9 mmBtu/hr	None
12S	11E	Radiant Tube Furnace (CGL)	1986	15.7 mmBtu/hr	None
14S	13E	Acrylic Coater (CGL)	1986	62 tons/hour	None
15S	14E	Boiler	1986	26.2 mmBtu/hr	None
16S	15E	Rig Preheater	1986	5.0 mmBtu/hr	None
17S-22S	16E-22E	Tight Coil Anneal Furnaces	1986	3.2 mmBtu/hr	None
23S-42S	22E-41E	Area Space Heaters (AGL)	2002	0.35 mmBtu/hr	None
43S-55S	42E-54E	Area Space Heaters (CGL)	2002	1.0 mmBtu/hr	None
56S-57S	55E-56E	Mobile Space Heaters	2002	1.5 mmBtu/hr	None
58S	57E	Hot Water Heater	2002	0.3 mmBtu/hr	None
59S	58E	Caterpillar Emergency Generator	2002	335 HP	None
60S	59E	Kohler Emergency Generator	2002	536 HP	None
61S	60E	Nissan Emergency Generator	2002	201 HP	None
62S-64S	61E-63E	Cooling Towers	2002	600 gal/min	None
65S-66S	64E-65E	Cooling Towers	2002	528 gal/min	None
67S	n/a	Paved Road (Fugitive)	2002	n/a	None
68S	67E	Coater Dryer (AGL)	2013	9.0 mmBtu/hr	None
69S	68E	Acrylic Coater (AGL)	2013	77 tons/hour	None

- (1) Emission Units between 1S and 69S not listed in the table have been removed from the facility.
- (2) Where more than one emission unit is listed, the design capacity is given on a per-unit basis.

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45 CSR § 30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NO_x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance Standards
CEM	Continuous Emission Monitor	PM	Particulate Matter
CES	Certified Emission Statement	PM_{2.5}	Particulate Matter less than 2.5µm in diameter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	Ppb	Pounds per Batch
C.S.R. or CSR	Codes of State Rules	pph	Pounds per Hour
DAQ	Division of Air Quality	ppm	Parts per Million
DEP	Department of Environmental Protection	Ppmv or ppmv	Parts per million by volume
dscm	Dry Standard Cubic Meter	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO₂	Sulfur Dioxide
lbs/hr	Pounds per Hour	TAP	Toxic Air Pollutant
LDAR	Leak Detection and Repair	TPY	Tons per Year
M	Thousand	TRS	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	TSP	Total Suspended Particulate
MDHI	Maximum Design Heat Input	USEPA	United States Environmental Protection Agency
MM	Million	UTM	Universal Transverse Mercator
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
MMCF/hr or mmcf/hr	Million Cubic Feet per Hour	VOC	Volatile Organic Compounds
NA	Not Applicable	VOL	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation.*

2.4. Term and Renewal

- 2.4.1. This permit supercedes and replaces previously issued Permit R13-1479B. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Applications R13-0971 and R13-1479 through R13-1479C and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to; **[45CSR§§13-5.11 and 13-10.3]**
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-4]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

2.10. Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission

limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are not met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and,
 - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emission, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1]

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45 C.S.R. 11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

- 3.2.1. **Emission Limit Averaging Time.** Unless otherwise specified, compliance with all annual limits shall be based on a rolling twelve month total. A rolling twelve month total shall be the sum of the measured parameter of the previous twelve calendar months. Compliance with all hourly emission limits shall be based on the applicable NAAQS averaging times or, where applicable, as given in any approved performance test method.

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:
- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
 - b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
 - c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
 - d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
 1. The permit or rule evaluated, with the citation number and language;

2. The result of the test for each permit or rule condition; and,
3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.
- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. State-Enforceable only.]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304-2345

If to the USEPA:

Associate Director
Office of Air Enforcement and Compliance Assistance
(3AP20)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

- 3.5.4. **Operating Fee.**

- 3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a Certified Emissions Statement (CES) and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

- 4.1.1. Only those emission units as identified in Table 1.0, with the exception of any *de minimis* sources as identified under Table 45-13B of 45CSR13, are authorized at the permitted facility. In accordance with the information filed in Permit Applications R13-0971 and R13-1479 through R13-1479C, the emission units identified under Table 1.0 of this permit shall be installed, maintained, and operated so as to minimize any fugitive escape of pollutants, shall not exceed the listed maximum design capacities, and shall use the specified control devices.
- 4.1.2. Maximum hourly and annual steel throughput on the Hot Dip Aluminizing and Galvanizing Line (AGL) shall be limited to 657,000 tons/year.
- 4.1.3. Maximum hourly and annual steel throughput on the Continuous Galvanizing Line (CGL) shall be limited to 543,120 tons/year.
- 4.1.4. Coating operations shall be performed in accordance with the following:
- a. Aggregate annual emissions of VOCs from use of coatings in the AGL and CGL Acrylic Coaters shall not exceed 19.26 tons.
 - b. Aggregate annual emissions of HAPs from use of coatings in the AGL and CGL Acrylic Coaters shall not exceed 0.01 tons.
 - c. For the purposes of determining on-going compliance with the emission limits set forth in 4.1.4(a) and (b), the permittee shall calculate the monthly and rolling twelve month total VOC and HAP emissions from all coating operations (AGL and CGL) pursuant to the requirements of 4.2.2.
 - d. On and after the date on which §60.8 requires a performance test to be completed, each owner or operator subject to this subpart shall not cause to be discharged into the atmosphere more than:
 - (1) 0.28 kilogram VOC per liter (kg-VOC/L) of coating solids applied for each calendar month for each affected facility that does not use an emission control device(s).
[\$60.462(a)(1)]
- 4.1.5. Operation of the natural gas-fired combustion units, identified as emission units 1S-4S, 6S, 11S-12S, 15S-58S, and 68S, shall be in accordance with the following:
- a. Each unit shall not exceed the MDHI listed under Table 1.0 of this permit and shall only combust natural gas, or a mixture of natural gas and hydrogen as fuel;
 - b. The maximum emissions from each unit shall not exceed the limits given in Appendix A of this permit; and
 - c. The maximum annual hours of operation of each unit shall not exceed the limit given in the following table:

Table 4.1.5(c): Natural Gas Combustion Units Annual Hours of Operation Limits

Emission Unit ID	Emission Unit Description	Annual Hours of Operation Limit
1S	Non-Oxygen Furnace (AGL)	None
2S	Radiant Tube Furnace (AGL)	None
3S	Gavanneal (AGL)	4,380
4S	Aluminum Premelt (AGL)	None
6S	Strip Dryer (AGL)	None
11S	Non-Oxygen Furnace (CGL)	None
12S	Radiant Tube Furnace (CGL)	None
15S	Boiler	None
16S	Rig Preheater	2,190
17S-22S ⁽¹⁾	Tight Coil Anneal Furnaces	2,190
23S-42S ⁽¹⁾	Area Space Heaters (AGL)	4,380
43S-55S ⁽¹⁾	Area Space Heaters (CGL)	4,380
56S-57S ⁽¹⁾	Mobile Space Heaters	2,190
58S	Hot Water Heater	None
68S	Coater Dryer (AGL)	None

(1) Hours of Operation Limit is given on a per-unit basis.

d. The fuel burning units, identified as 15S and 58S, is subject to the applicable limitations and standards under 45CSR2, including the requirements as given below under (1) through (3):

(1) The permittee shall not cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from the fuel burning units which is greater than ten (10) percent opacity based on a six minute block average.

[45CSR§2-3.1]

(2) The permittee shall not cause, suffer, allow or permit the discharge of particulate matter into the open air from the fuel burning units, measured in terms of pounds per hour in excess of the amount determined as follows:

(i) The product of 0.09 and the total design heat input for the fuel burning units in million British Thermal Units (B.T.U.'s) per hour, provided however that no more than twelve hundred (1200) pounds per hour of particulate matter shall be discharged into the open air.

[45CSR§2-4.1a]

(3) The visible emission standards set forth in section 3 of 45CSR2 shall apply at all times except in periods of start-ups, shutdowns and malfunctions. Where the Director believes that start-ups and shutdowns are excessive in duration and/or frequency, the Director may require an owner or operator to provide a written report demonstrating that such frequent start-ups and shutdowns are necessary.

[45CSR§2-9.1]

e. The type 'd' source operations, furnaces, dryers, and process heaters identified as 1S-4S, 6S,

11S-12S, 16S, 12S-22S, are subject to the applicable limitations and standards under 45CSR7, including the requirement as given below under (1) through (3).

(1) The permittee shall not cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any manufacturing process source operation which is greater than twenty (20) percent opacity, except as noted under 4.1.6.b.

[45CSR§7-3.1]

(2) The provisions of subsection 4.1.6.a shall not apply to smoke and/or particulate matter emitted from the Kiln which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period.

[45CSR§7-3.2]

(3) The permittee shall not cause, suffer, allow or permit particulate matter to be vented into the open air from any manufacturing process source operation, or from all air pollution control equipment installed on any manufacturing process source operation, in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of 45CSR7.

[45CSR§7-4.1]

f. The fuel burning units, identified as 15S and 58S, are subject to the applicable limitations and standards under 45CSR10, including the requirement as given below under (1).

(1) The permittee shall not cause, suffer, allow or permit the discharge of sulfur dioxide into the open air from the fuel burning units measured in terms of pounds per hour, in excess of the product of 3.2 and the total design heat of the boilers in million BTU's per hour.

[45CSR§10-3.1]

4.1.6. Operation of the Emergency Generators, identified as emission units 59S-61S, shall be in accordance with the following:

a. Each unit shall be limited to the specific model and design capacity as given under Table 1.0 of the permit;

b. Each unit shall be fueled by No. 2 fuel oil not exceeding a fuel sulfur content greater than 0.5% by weight;

c. The maximum emissions from each unit shall not exceed the limits given in Appendix A of this permit; and

d. Each unit shall be limited to a maximum of 500 annual hours of operation.

4.1.7. Operation of the cooling towers, identified as emission units 62S-66S, shall be in accordance with the following:

a. The maximum aggregate PM emissions from all units shall not exceed 3.26 lbs/hour or 14.26 TPY; and

b. The maximum capacity of the units shall not exceed the limit given under Table 1.0 of this permit. As the annual emission limit given in 4.1.8(a) are based on operating 8,760 hours/year, there is no limit on the annual hours of operation or annual water throughput of the Cooling Towers.

4.2. Monitoring, Compliance Demonstration and Source-Specific Recordkeeping and Reporting Requirements

4.2.1. For the purposes of demonstrating compliance with the maximum annual throughput limits for the AGL and CGL set forth in 4.1.2. and 4.1.3., the permittee shall monitor and record the monthly and rolling twelve month total throughput of coils in the AGL and CGL line.

4.2.2. For the purposes of demonstrating compliance with 4.1.4(c), the permittee shall calculate the monthly and rolling twelve month total VOC and HAP emissions from all coating operations (AGL and CGL) according to the following methods:

a. The permittee shall maintain records of the following:

- (1) The name and volume (in gallons) of each coating, as applied, on a monthly basis; and
- (2) The mass of VOC and HAP per volume (in pounds/gallon) of each coating, as used, on a monthly basis.

b. The permittee shall determine the mass of VOCs and HAPs per volume of each coating by one of the following methods:

- (1) Certified Product Data Sheets ("Certified Product Data Sheets" shall have the definition assigned to them under 40 CFR 63, Subpart KK) or an equivalent provided by the material supplier,
- (2) Material Safety and Data Sheets; or
- (3) A test conducted, or have conducted, by the permittee to determine the applicable quantities using either Method 24 of 40 CFR 60 or a test method approved in advance by the Director, or
- (4) Results of a test to determine VOC/HAP content using another EPA approved test method as approved in advance by the Director.

c. The total mass of VOCs and HAPs of each coating, as used, on a monthly basis, shall be calculated using the following formula:

$$\text{Mass(pounds of VOCs, HAPs/Month)} = A*B$$

Where: A = monthly material usage in gallons per month

B = VOC and HAP per volume content of the material used in pounds per gallon as determined under 4.2.2(b).

d. The annual and monthly emission rates of VOCs and aggregate and HAPs shall be calculated in the following manner:

- (1) The annual emission rate of VOCs and HAPs shall be calculated as the sum of the monthly emission rates of VOCs and aggregate and HAPs, respectively, from the previous twelve (12) months.
- (2) The monthly emission rate of VOCs and HAPs shall be equal to the total mass of VOCs and HAPs of each coating, as used, on a monthly basis as calculated under 4.2.2(c).

- 4.2.3. For the purposes of demonstrating compliance with the maximum hours of operation limits for the natural-gas combustion units set forth in 4.1.5., the permittee shall monitor and record the monthly and rolling twelve month total hours of operation of each unit with a limit in Table 4.1.5(c).
- 4.2.4. For the purposes of demonstrating compliance with visible emissions limitations set forth in 4.1.5(d)(1) and (e)(1), the permittee shall:
 - a. Conduct monthly Method 22 visible emission observations of the applicable units' stacks to ensure proper operation for a minimum of ten (10) minutes each month the units are in operation.
 - b. In the event visible emissions are observed in excess of the limitations given under 4.1.5(d)(1) or (e)(1), the permittee shall take immediate corrective action.
 - c. The permittee shall maintain records of all visual emission observations pursuant to the monitoring required under 4.2.4. including any corrective action taken.
 - d. Any deviation(s) from the allowable visible emission requirement for any emission source discovered during observations using 40CFR Part 60, Appendix A, Method 9 or 22 shall be reported in writing to the Director of the Division of Air Quality as soon as practicable, but in any case within ten (10) calendar days of the occurrence and shall include at least the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.
- 4.2.5. For the purposes of determining compliance with the percent sulfur requirement under 4.1.6(b), the permittee shall, for each load of No. 2 Fuel Oil delivered to the facility, obtain from the fuel supplier a certification of the sulfur content of the fuel supplied.
- 4.2.6. For the purposes of demonstrating compliance with the maximum hours of operation limits for the emergency generators set forth in 4.1.6(d), the permittee shall monitor and record the monthly and rolling twelve month total hours of operation the emergency generators.
- 4.2.7. The permittee shall meet all applicable Monitoring, Compliance Demonstration and Source-Specific Recordkeeping and Reporting Requirements as given under 40 CFR 60, Subpart TT.

4.3. Testing Requirements

- 4.3.1. At such reasonable time(s) as the Secretary may designate, in accordance with the provisions of 3.3 of this permit, the permittee shall conduct or have conducted test(s) to determine compliance with the emission limitations established in the permit application and/or applicable regulations.
- 4.3.2. The permittee shall meet all applicable Performance Testing Requirements as given under 40 CFR 60, Subpart TT.

4.4. Recordkeeping Requirements

- 4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
 - a. The date, place as defined in this permit and time of sampling or measurements;
 - b. The date(s) analyses were performed;

- c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of the analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
- 4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
- 4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
- a. The equipment involved.
 - b. Steps taken to minimize emissions during the event.
 - c. The duration of the event.
 - d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

Appendix A⁽¹⁾
Wheeling Nisshin, Inc.: Follansbee
R13-1497C: 009-00023

Emission Unit	EP ID	CO		NO _x		PM ⁽²⁾		SO _x		VOC		CO ₂		HAPs	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Non-Oxygen Furnace (AGL)	1E	4.10	17.96	4.88	21.37	0.37	1.62	0.03	0.13	0.27	1.18	5,860	25,668	0.09	0.39
Radiant Tube Furnace (AGL)	2E	1.39	6.09	1.65	7.23	0.13	0.57	0.01	0.04	0.09	0.39	1,981	8,677	0.03	0.13
Gavanneal (AGL)	3E	1.67	3.66	1.99	4.36	0.15	0.33	0.01	0.02	0.11	0.24	2,388	5,230	0.04	0.09
Aluminum Premelt (AGL)		0.57	2.50	0.68	2.98	0.05	0.22	0.01	0.04	0.04	0.18	811	3,552	0.01	0.04
Strip Dryer (AGL)	5E	0.25	1.10	0.29	1.27	0.02	0.09	0.01	0.04	0.02	0.09	350	1,533	0.01	0.04
Non-Oxygen Furnace (CGL)	10E	2.52	11.04	3.00	13.14	0.23	1.01	0.02	0.09	0.17	0.74	3,600	15,768	0.06	0.26
Radiant Tube Furnace (CGL)	11E	1.28	5.61	1.52	6.66	0.12	0.53	0.01	0.04	0.08	0.35	1,827	8,002	0.03	0.13
Boiler	14E	2.13	9.33	2.54	11.13	0.19	0.83	0.02	0.09	0.14	0.61	3,047	13,346	0.05	0.22
Rig Preheater	15E	0.41	0.45	0.49	0.54	0.04	0.04	0.01	0.01	0.03	0.03	583	638	0.01	0.01
Tight Coil Anneal Furnaces	16E-21E	0.26	0.29	0.31	0.34	0.02	0.03	~0.00	0.00	0.02	0.02	2,237	2,450	~0.00	0.00
Area Space Heaters (AGL)	22E-41E	0.03	0.06	0.03	0.07	~0.00	0.00	~0.00	0.00	~0.00	0.00	816	1,787	~0.00	0.00
Area Space Heaters (CGL)	42E-54E	0.08	0.18	0.10	0.21	0.01	0.02	~0.00	0.00	0.01	0.01	1,515	3,318	~0.00	0.00
Mobile Space Heaters	55E-56E	0.13	0.14	0.15	0.16	0.01	0.01	~0.00	0.00	0.01	0.01	350	383	~0.00	0.00
Hot Water Heater	57E	0.03	0.13	0.03	0.13	0.01	0.04	~0.00	0.00	0.01	0.04	35	153	~0.00	0.00
Caterpillar Emergency Generator	58E	2.45	0.61	3.84	0.96	0.31	0.08	0.71	0.18	0.46	0.12	399	100	0.01	0.00
Kohler Emergency Generator	59E	7.61	1.90	14.11	3.53	1.41	0.35	2.40	0.60	0.16	0.04	746	187	0.01	0.00
Nissan Emergency Generator	60E	1.40	0.35	6.48	1.62	0.46	0.12	0.43	0.11	0.53	0.13	241	60	0.01	0.00
Coater Dryer (AGL)	67E	0.73	3.20	0.87	3.81	0.06	0.26	0.01	0.04	0.04	0.18	1,049	4,595	0.01	0.04

(1) Emissions for multiple units are given on a per-unit basis.
 (2) All particulate matter emissions are assumed to be 2.5 microns or less.

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature¹ _____
(please use blue ink) Responsible Official or Authorized Representative Date

Name and Title _____
(please print or type) Name Title

Telephone No. _____ Fax No. _____

- ¹ This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:
- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (I) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
 - b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
 - c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or
 - d. The designated representative delegated with such authority and approved in advance by the Director.