

West Virginia Department of Environmental Protection

*Earl Ray Tomblin
Governor*

Division of Air Quality

*Randy C. Huffman
Cabinet Secretary*

Permit to Modify



R13-1910D

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:
Precoat Metals
Weirton
009-00054

*John A. Benedict
Director*

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

This permit will supercede and replace Permit R13-1910B issued on October 26, 2006.

Facility Location: Weirton, Brooke County, West Virginia
Mailing Address: 4502 Freedom Way, Weirton, WV 26062
Facility Description: Metal Coil Coating
NAICS Codes: 332812
UTM Coordinates: 534.83 km Easting • 4,474.18 km Northing • Zone 17
Permit Type: Modification
Description of Change: Installation of a 4.46 mmBtu/hr natural-gas fired infrared drying oven.

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.

The source is subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement date of any operation authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

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1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
1s (1e)	001-01	Wet Section Process	1996	158,232 lb/hr of cleaned and treated metal	None
2s (2e)	002-01	Prime Coating	1996	180 gal/hr VOC	None
3s (2e)	002-02	Finish Coating	1996	180 gal/hr VOC	None
4s (4e-1&4e-2)	003-01	Prime Oven	1996	180 gal/hr solvent; 45 MMBtu/hr	Direct Flame Afterburner
5s (4e-1&4e-2)	003-02	Finish Oven	1996	180 gal/hr solvent; 45 mmBtu/hr	Direct Flame Afterburner
4e-1	003-03	Afterburner	1996	36 mmBtu/hr	N/A
4e-2	003-09	Waste Heat Boiler	1996	36 mmBtu/hr	None
6s (6e)	004-01	Wastewater Treatment	1996	40 GPM, 50,000 GPD; 350 acfm	None
7s (7e)	005-01	Brush Unit	1996	3,300 ft ² /min of coil; 5,800 acfm	None
8s (8e)	003-04	Natural Gas-Fired Infrared Drying Oven	2012	4.46 mmBtu/hr	None

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

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 R13-1910B. 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 Application R13-1910, R13-1910A, R13-1910B, R13-1910D 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 to this permit as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.
[45CSR§14-7 or 45CSR§19-14]

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

[Reserved]

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.

[WV Code § 22-5-4(a)(15)]

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 Enforcement and Permits Review
(3AP12)
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 (Wet Section Process - 1E)

4.1. Limitations and Standards

4.1.1. Source emissions of air pollutants to the atmosphere from 1e shall not exceed the following:

Table 4.1.1.: 1e Emission Limits

Source Description	Emission Type	Pounds/hour	Tons/year
Wet Section Process - 1E	chromium	0.016	0.070
	hydrogen chloride	0.039	0.00084*
	hydrogen fluoride	0.114	0.50
	nitric acid	0.163	0.71
	phosphoric acid	0.057	0.25

* based on 43 hours per year

4.1.2. No person shall cause, suffer, allow, or permit emissions of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in subsections 45CSR§7.3.2 (4.1.3. of this permit), 3.3, 3.4, 3.5, 3.6, and 3.7 [of 45CSR7].
[45CSR§7-3.1.]

4.1.3. The provisions of Section 4.1.2. (45CSR§7-3.1.) shall not apply to smoke and/or particulate matter emitted from any process source operation 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.]

4.1.4. Mineral acids shall not be released from any type source operation or duplicate source operation or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity give in Table 45-7B [of 45CSR7] found at the end of the rule. Compliance with the 45CSR§7-4.2. hourly emissions limitations for this emission group shall be demonstrated through compliance with the more stringent R13-1910 hourly mineral acids limitations set forth in subsection 4.1.1. of this permit.
[45CSR§7-4.2.]

4.1.5. No person shall circumvent the provisions of 45CSR7, by adding additional gas to any exhaust or group of exhausts for the purpose of reducing the stack gas concentration.
[45CSR§7-4.3.]

4.2. Monitoring Requirements

4.2.1. At least weekly, visual emission checks of each emission point subject to an opacity limit shall be conducted. For units emitting directly into the open air from points other than a stack outlet, visible emissions are to include visible fugitive dust emissions that leave the plant site boundaries. These checks shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the unit has visible emissions using procedures outlined in 40 CFR 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 CFR 60, Appendix A, Method 9 evaluation within twenty-four (24) hours. A Method 9 evaluation shall not be required if the visible emission condition is corrected in

a timely manner and the units are operated at normal operating conditions. A record of each visible emission check required above shall be maintained on site for a period of no less than five (5) years. Said record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.

4.3. Testing Requirements

4.3.1. Compliance with the emissions limitations established for the Wet Section Process in section 4.1.1. shall be demonstrated as follows:

- a. Source testing for, chromium, hydrogen chloride, hydrogen fluoride, nitric acid, and phosphoric acid shall be performed in accordance with 45CSR7A, or alternative method approved by the Director, once in the first year of permit issuance.
- b. Sampling and analytical procedures for the determination of chromium are EPA Test Methods 25A and 306, respectively. The test method for the determination of hydrogen fluoride is 13B. Test Method 26A is used in the determination of the mineral acids, hydrogen chloride, nitric acid, and phosphoric acid.

Additionally, the permittee may be required to test for other pollutants (i.e. other metals and other mineral acids) at a later date.

[45CSR§30-5.1.c.]

4.4. Recordkeeping Requirements

4.4.1. The Permittee shall keep records of the visible emission check required in Section 4.2.1. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer. These records shall be maintained on site for a period of no less than five (5) years and shall be made available to the Secretary or his duly authorized representative upon request.

[45CSR§30-5.1.c.]

4.5. Reporting Requirements

4.5.1. The permittee shall submit results from stack tests required in Section 4.3.1., to the Director, within sixty (60) days from the date of completion of said testing. [45CSR§30-5.1.c.]

5.0. Source-Specific Requirements (Prime Process and Finish Coater Process -2E)

5.1. Limitations and Standards

5.1.1. Source emissions of air pollutants to the atmosphere shall not exceed the following:

Table 5.1.1.: 2e Emission Limits

Source Description	Emission Type	Pounds/hour	Tons/year
Prime Coater Process and Finish Coater Process - 2E	formaldehyde	0.04	0.18
	total VOC	20.0	87.6

- 5.1.2. The permittee shall use coatings listed as per Material Safety Data Sheets submitted with the permit application, Number R13-1910, or submitted as necessary to this Division for approval.
- 5.1.3. The permittee may submit coating formulations with threshold limit values, odor thresholds, and other information as may be required by the Director for approval by this Division instead of Material Safety Data Sheets as per 5.1.2. The coating formulations may account for maximum weight percent usage of VOCs and potential usage of VOCs at a later date. Additional coating formulations may be submitted if the maximum weight percent usage of VOCs increases past previously allowable levels or if VOCs not previously listed in coating formulations are to be used in coatings.
- 5.1.4. The permittee shall not cause to be discharged into the atmosphere more than 1.15 lb VOC per gallon of coating solids applied for each calendar month.
[40 C.F.R. 60.462(2), Subpart TT]

5.2. Monitoring Requirements

- 5.2.1. Material Safety Data Sheets shall be maintained on site and shall be made available for inspection by the Agency.
[45CSR§30-5.1.c.]

5.3. Testing Requirements

- 5.3.1. The permittee shall perform stack testing to determine VOC emissions from emission point 2E as per Methods 1, 2, 3, 4, 24, and 25 of Subpart A "General Provisions" located in Part 60 of Title 40 of the Code of Federal Regulations. These tests shall be performed once the first year of permit issuance.
[45CSR§30-5.1.c.]

5.4. Recordkeeping Requirements

- 5.4.1. The following records shall be maintained on site and in accordance with Section 3.4.1. of this permit:
 - a. The monthly usage of each coating, varnish, thinner and solvent and the VOC content of each.
 - b. The hours of operation of the facility each month.
 - c. The tons per month of VOCs emitted from the coater processes.
 - d. Average pounds per hour of VOCs emitted from the coating processes.**[45CSR§30-5.1.c.]**
- 5.4.2. The permittee shall maintain records of formaldehyde emissions and such formaldehyde emissions shall be calculated using a maximum percentage of formaldehyde by weight of 0.075. The records of the calculation and emissions of formaldehyde shall be updated and maintained on a monthly basis.
[45CSR§30-5.1.c.]

5.5. Reporting Requirements

- 5.5.1. The documents generated in accordance with Sections 5.4.1. and 5.4.2. shall be certified by a responsible official and submitted to the Director no later than fifteen (15) days after the end of each quarter and in accordance with Section 3.5.3. of this permit.
[45CSR§30-5.1.c.]
- 5.5.2. The permittee shall submit results from stack tests required in Section 5.3.1., to the Director within

sixty (60) days from the date of completion of said testing. [45CSR§30-5.1.c.]

6.0. Source-Specific Requirements (Prime Oven Process and Finish Oven Process -4E)

6.1. Limitations and Standards

6.1.1. Source emissions of air pollutants to the atmosphere shall not exceed the following:

Table 6.1.1. Prime Oven Process and 4E Emission Limits

Source Description	Emission Type	Pounds/hour	Tons/year
Prime Oven Process and Finish Oven	carbon monoxide	14.0	61.3
	formaldehyde	0.060	0.26

Source Description	Emission Type	Pounds/hour	Tons/year
Process - 4E	nitrogen oxides	15.6	68.3
	particulate matter	0.94	4.1
	sulfur dioxide	0.275	1.20
	total VOC	32.4	141.9

- 6.1.2. No more than sixty (60) percent of the effluent combustion stream from the afterburner shall be diverted from emission point 4E to the waste heat boiler.
- 6.1.3. The afterburner used to control emissions from the Prime Finish Oven and Finish Oven shall be operated in such a manner to be at least 98.5 percent efficient in destroying VOCs.
- 6.1.4. The Finish Oven shall be operated in such a manner to be at least 50.0 percent efficient in destroying VOCs.
- 6.1.5. No person shall cause, suffer, allow, or permit emissions of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in 45CSR§7.3.2 (6.1.6 of this permit), 3.3, 3.4, 3.5, 3.6, and 3.7 [of 45CSR7].
[45CSR§7-3.1.]
- 6.1.6. The provisions of 45CSR§7-3.1 (6.1.5. of this permit) shall not apply to smoke and/or particulate matter emitted from any process source operation 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.]
- 6.1.7. No person shall circumvent the provisions of 45CSR7, by adding additional gas to any exhaust or group of exhausts for the purpose of reducing the stack gas concentration.
[45CSR§7-4.3.]
- 6.1.8. No person shall cause, suffer, allow, or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or suplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A [of 45CSR7] found at the end of the rule.

Compliance with the 45CSR7-4.1. hourly emission limit for this emission group shall be demonstrated through compliance with the more stringent R13-1910 hourly particulate matter limit set forth in subsection 6.1.1.

[45CSR§7-4.1.]

- 6.1.9. No person shall cause, suffer, allow or permit any manufacturing process generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.

[45CSR§7-5.1.]

- 6.1.10. **Exemptions.** Maintenance operations (as defined in 45CSR7) shall be exempt from the provisions of section 4 [of 45CSR7] provided that at all times the owner or operator shall conduct maintenance operations in a manner consistent with good air pollution control practice for minimizing emissions.

[45CSR§7-10.3.]

- 6.1.11. The permittee shall not cause, suffer, allow or permit the discharge sulfur dioxide to the open air from the combustion of fuel in a fuel burning unit of a waste heat boiler in excess of 2.2 pounds of sulfur dioxide per million BTU's of heat input per hour.

[45CSR§10-3.7.]

- 6.1.12. The permittee shall not cause, suffer, allow or permit the emission into the open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 parts per million by volume.

[45CSR§10-4.1.]

- 6.1.13. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 (Afterburner) and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.

[45CSR§13-5.11.]

6.2. Monitoring Requirements

- 6.2.1. At least weekly, visual emission checks of each emission point subject to an opacity limit shall be conducted. For units emitting directly into the open air from points other than a stack outlet, visible emissions are to include visible fugitive dust emissions that leave the plant site boundaries. These checks shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the unit has visible emissions using procedures outlined in 40 CFR 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 CFR 60, Appendix A, Method 9 evaluation within twenty-four (24) hours. A Method 9 evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions. A record of each visible emission check required above shall be maintained on site for a period of no less than five (5) years. Said record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.

[45CSR§30-5.1.c.]

- 6.2.2. The owner or operator shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve 98.5% efficiency. This device shall have an accuracy of $\pm 2.5^{\circ}\text{C}$. or or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. The owner or operator shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in the thermal incinerator used to control emissions from the affected facility remains more than 28°C (50°F) below the temperature at which compliance was demonstrated during the most recent measurement of incinerator efficiency. Reports of these occurrences shall be submitted every calendar quarter to the Secretary. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.

[40 C.F.R. §§ 60.464(c) and 60.465, Subpart TT]

- 6.2.3. Upon demonstration of compliance with NO_x and CO limits per testing requirements of section 6.3.1., continual compliance shall be demonstrated through documentation that natural gas is the only fuel combusted in the prime oven, finish oven, and afterburner.

[45CSR§30-5.1.c.]

- 6.2.4. Continual compliance with the particulate matter and sulfur dioxide limits shall be demonstrated through documentation that natural gas is the only fuel combusted in the prime oven, finish oven, and afterburner.

[45CSR§30-5.1.c.]

6.3. Testing Requirements

- 6.3.1. The permittee shall perform stack testing to determine carbon monoxide and nitrogen oxides emissions from emission point 4E as per Method 10 and Method 7, respectively, of Subpart A "General Provisions" located in Part 60 of Title 40 of the Code of Federal Regulations and per the provisions of section 3.3.1. of this permit. This testing shall be performed within the first year of permit issuance.

- 6.3.2. The permittee shall perform VOC testing utilizing Method 25 (40 C.F.R. 60, Appendix A), of the Code of Federal Regulations, or other methods as approved by the Secretary. This testing shall be performed within the first year of permit issuance.

[45CSR§30-5.1.c.]

- 6.3.3. Testing of the waste heat boiler exhaust shall be conducted when the maximum 60 percent of the afterburner exhaust is directed to the boiler.

[45CSR§30-5.1.c.]

6.4. Recordkeeping Requirements

- 6.4.1. The permittee shall maintain records of formaldehyde emissions and such formaldehyde emissions shall be calculated using a maximum percentage of formaldehyde by weight of 0.075. The records of the calculation and emissions of formaldehyde shall be updated and maintained on a monthly basis.

[45CSR§30-5.1.c.]

- 6.4.2. Compliance with the sulfur dioxide limit shall be demonstrated by maintaining records of the quantity and quality of fuel combusted each month in the prime and finish ovens, and the afterburner; and the hours of operation.

[45CSR§30-5.1.c.]

- 6.4.3. The owner or operator shall compute and record the average VOC content of coatings applied during each calendar month, according to the equations provided in 40 C.F.R. 60.463, Subpart TT.
[40 C.F.R. §60.464(a), Subpart TT]
- 6.4.4. The Permittee shall keep records of the visible emission check required. Said record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR§30-5.1.c.]
- 6.4.5. **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.
- 6.4.6. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0 (Afterburner), 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:
- 6.4.6.1. The equipment involved
 - 6.4.6.2. Steps taken to minimize emissions during the event.
 - 6.4.6.3. The duration of the event.
 - 6.4.6.4. The estimated increase in emissions during the event.

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

- 6.4.6.5. The cause of the malfunction
- 6.4.6.6. Steps taken to correct the malfunction
- 6.4.6.7. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

6.5. Reporting Requirements

- 6.5.1. The reporting period for the reports required in section 6.4.3. of this permit is each six-month period. All reports shall be submitted to the Secretary and shall be postmarked by the 30th day following the end of the reporting period.
[40 C.F.R. §60.48c., Subpart Dc]
- 6.5.2. The owner or operator shall include the following data in the initial compliance report and each report required at permit renewal:
- 6.5.2.1. The weighted average of the VOC content of coatings used during a period of one calendar month.
 - 6.5.2.2. The overall VOC destruction rate used to attain compliance with §60.462(a)(2), Subpart TT.
 - 6.5.2.3. The combustion temperature of the thermal incinerator used to attain compliance with §60.462(a)(2), Subpart TT.

[40 C.F.R. §60.465, Subpart TT]

7.0. Source-Specific Requirements (Wastewater Treatment -6E)

7.1. Limitations and Standards

7.1.1. Source emissions of air pollutants to the atmosphere shall not exceed the following:

Table 7.1.1.: Wastewater Treatment Emission Limits

Source Description	Emission Type	Pounds/hour	Tons/year
Wastewater Treatment - 6E	sulfur dioxide	0.20	0.88

7.1.2. The permittee shall not cause, suffer, allow or permit the emission into the open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 parts per million by volume. [45CSR§10-4.1.]

7.2. Monitoring Requirements

7.2.1. The permittee shall properly operate the wastewater treatment process by providing adequate mixing of the wastewater and chemicals, maintaining proper pH levels, and allowing sufficient reaction time. [45CSR§30-5.1.c.]

7.3. Recordkeeping Requirements

7.3.1. The permittee shall keep monthly engineering estimates, along with the supporting documentation, of the amount of sulfur dioxide emitted. [45CSR§30-5.1.c.]

8.0. Source-Specific Requirements (Brush Unit Process -7E)

8.1. Limitations and Standards

8.1.1. Source Emissions of air pollutants to the atmosphere shall not exceed the following:

Table 8.1.1.: Brush Unit Process Emission Limits

Source Description	Emission Type	Pounds/hour	Tons/year
Brush Unit Process - 7E	particulate matter	0.25	1.10

8.1.2. No person shall cause, suffer, allow, or permit emissions of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in subsections 3.2 (4.1.3. of this permit), 3.3, 3.4, 3.5, 3.6, and 3.7 [of 45CSR7]. [45CSR§7-3.1.]

8.1.3. The provisions of Section 4.1.2. (45CSR§7-3.1.) shall not apply to smoke and/or particulate matter emitted from any process source operation 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.]

8.1.4. No person shall circumvent the provisions of 45CSR7, by adding additional gas to any exhaust or group of exhausts for the purpose of reducing the stack gas concentration.

[45CSR§7-4.3.]

8.2. Monitoring Requirements

8.2.1. At least weekly, visual emission checks of each emission point subject to an opacity limit shall be conducted. For units emitting directly into the open air from points other than a stack outlet, visible emissions are to include visible fugitive dust emissions that leave the plant site boundaries. These checks shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the unit has visible emissions using procedures outlined in 40 CFR 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 CFR 60, Appendix A, Method 9 evaluation within twenty-four (24) hours. A Method 9 evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions. A record of each visible emission check required above shall be maintained on site for a period of no less than five (5) years. Said record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer.

[45CSR§30-5.1.c.]

8.2.2. Visual inspections for excess particulate matter on the roof in the area of the stack are to be performed monthly.

[45CSR§30-5.1.c.]

8.3. Recordkeeping Requirements

8.3.1. The Permittee shall keep records of the visible emission check required in Section 8.2.1. Said records shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirement, the results of the check, what action(s), if any, was/were taken, and the name of the observer. These records shall be maintained on site for a period of no less than five (5) years and shall be made available to the Secretary or his duly authorized representative upon request.

[45CSR§30-5.1.c.]

9.0. Source-Specific Requirements (Infrared Drying Oven -8e)

9.1. Limitations and Standards

9.1.1. Maximum combustion exhaust emissions from operation of the Infrared Drying Oven shall not exceed those values given in the following table:

Table 9.1.1.: Infrared Drying Oven Emission Limits⁽¹⁾

CO		NO _x	
lb/hr	TPY	lb/hr	TPY
0.37	1.62	0.45	1.97

⁽¹⁾ Other criteria pollutant emission limits not given as all were less than 0.10 lbs/hr.

9.1.2. Operation of the Infrared Drying Oven shall be in accordance with the following:

- a. The MDHI shall not exceed 4.46 mmBtu/hr and the unit shall only be fired by natural gas;
- b. The unit shall not be used to dry VOC-containing materials; and

-
- c. As the annual emission limits given in Table 9.1.1. are based on operating 8,760 hours/year, there is no limit on the annual hours of operation or fuel usage of the dryer.

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. _____

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- 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.