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August 5, 2015

EXPRESS MAIL

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Mr. William F. Durham
Director
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Id. No. 009-00004 Reg. R13-3265
R13-2379D
Company _____
Facility _____ Region 1
Initials gcl/gg

Subject: NSR Permit and Title V Permit Revision Application
Jupiter Aluminum Corporation
Jupiter Coil Coating
Beech Bottom, West Virginia
NSR Permit No: R13-2379C
Title V Operating Permit No: R30-00900004-2012
IES Project No. EV151123.01 and EV151123.02



Dear Mr. Durham:

On behalf of Jupiter Aluminum Corporation (Jupiter), IES Engineers (IES) is pleased to submit the enclosed NSR Permit and Title V Permit Revision Application for its facility in Beech Bottom, West Virginia. One hard copy of the application package is attached. Two copies of this application package are being submitted on separate CDs.

Jupiter purchased Coating Line # 1 and the Department approved the transfer of NSR Permit No. R13-2379C and Operating Permit R30-00900004-2012 via letter dated June 14, 2013. These permits regulate Coating Line # 1 and Coating Line # 2. The purpose of this application is to split the current operating permit into two permits and NSR permit into two permits and to make a number of other changes. Jupiter requests one operating permit and one NSR permit to include only the operating sources that are associated with Coating Line # 1 and the second operating permit and NSR permit to include the remainder of the sources associated with Coating Line # 2.

Additionally, Jupiter is also requesting the following changes for the Coating Line #1:

- Remove CCL #1 Primer Quench Tank (Emission Unit ID 3S) and CCL #1 Finish Quench Tank (Emission Unit ID 4S) from the operating permit. These emission units do not emit any regulated air pollutants. This modification request is combined with the application to split the current operating and NSR permit into two permits as per discussion between Ms. Carrie McCumbers of West Virginia DEP and Mr. Sam Joshi of IES Engineers on May 29, 2015.



Mr. William F. Durham

August 5, 2015

Page 2

- Remove four 25.2 MMBtu/hr boilers from the operating permit. These boilers were replaced with one 8.65 MMBtu/hr boiler, an insignificant source, in year 2013.
- Update facility mailing address and telephone number.
- The facility paints metal coils, not just steel coils. Update language in the permit to refer to the more generic “metal” instead of “steel” coils.

We look forward to working with you during your review of this application. Please feel free to contact me or Mr. Mark Volkmann at (219) 933-2752 if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads 'Marjorie J. Fitzpatrick'.

Marjorie J. Fitzpatrick, QEP
Principal Project Manager

Attachments

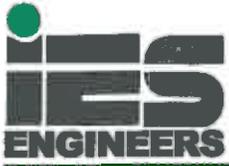
cc: M. Volkmann, Jupiter
A. Soni, IES



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NSR PERMIT AND TITLE V PERMIT REVISION APPLICATION



WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
 601 57th Street, SE
 Charleston, WV 25304
 (304) 926-0475
www.dep.wv.gov/dag

APPLICATION FOR NSR PERMIT
AND
TITLE V PERMIT REVISION
(OPTIONAL)

PLEASE CHECK ALL THAT APPLY TO NSR (45CSR13) (IF KNOWN):

- CONSTRUCTION MODIFICATION RELOCATION
 CLASS I ADMINISTRATIVE UPDATE TEMPORARY
 CLASS II ADMINISTRATIVE UPDATE AFTER-THE-FACT

PLEASE CHECK TYPE OF 45CSR30 (TITLE V) REVISION (IF ANY):

- ADMINISTRATIVE AMENDMENT MINOR MODIFICATION
 SIGNIFICANT MODIFICATION

IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS ATTACHMENT S TO THIS APPLICATION

FOR TITLE V FACILITIES ONLY: Please refer to "Title V Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.

Section I. General

1. Name of applicant (as registered with the WV Secretary of State's Office): Jupiter Aluminum Corporation		2. Federal Employer ID No. (FEIN): 3 6 3 8 0 5 4 7 8	
3. Name of facility (if different from above): Jupiter Coil Coating		4. The applicant is the: <input type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input checked="" type="checkbox"/> BOTH	
5A. Applicant's mailing address: 8963 River Road Wellsburg, WV, 26070		5B. Facility's present physical address: 8963 River Road Beech Bottom, WV, 26030	
6. West Virginia Business Registration. Is the applicant a resident of the State of West Virginia? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO - If YES, provide a copy of the Certificate of Incorporation/Organization/Limited Partnership (one page) including any name change amendments or other Business Registration Certificate as Attachment A . - If NO, provide a copy of the Certificate of Authority/Authority of L.L.C./Registration (one page) including any name change amendments or other Business Certificate as Attachment A .			
7. If applicant is a subsidiary corporation, please provide the name of parent corporation: Jupiter Aluminum Corporation			
8. Does the applicant own, lease, have an option to buy or otherwise have control of the proposed site? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO - If YES, please explain: Jupiter Aluminum Corporation leases the proposed site and is the owner of the equipment. - If NO, you are not eligible for a permit for this source.			
9. Type of plant or facility (stationary source) to be constructed, modified, relocated, administratively updated or temporarily permitted (e.g., coal preparation plant, primary crusher, etc.): Metal Coil Coating facility			10. North American Industry Classification System (NAICS) code for the facility: 332812
11A. DAQ Plant ID No. (for existing facilities only): 0 0 9 - 0 0 0 0 4		11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only): R13-2379C and R30-00900004-2012	

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

<p>12A.</p> <ul style="list-style-type: none"> For Modifications, Administrative Updates or Temporary permits at an existing facility, please provide directions to the <i>present location</i> of the facility from the nearest state road; For Construction or Relocation permits, please provide directions to the <i>proposed new site location</i> from the nearest state road. Include a MAP as Attachment B. <p>Facility is located on the west side of West Virginia State Route 2, immediately south of the Village of Beech Bottom.</p>		
12.B. New site address (if applicable):	12C. Nearest city or town:	12D. County:
12.E. UTM Northing (KM):	12F. UTM Easting (KM):	12G. UTM Zone:
<p>13. Briefly describe the proposed change(s) at the facility: Jupiter Aluminum Corporation (Jupiter) purchased Coating Line # 1 and the transfer of Permit No. R13-2379C and R30-0090004-2012 was approved by the Department via letter dated June 14, 2013. These permits consists of Coating Line # 1 and Coating Line # 2. The purpose of this application is to split the operating permit and NSR permit into two permits and to make a number of other changes. Jupiter requests one permit to include the operating sources that are associated with Coating Line # 1 and the second permit to include the remainder of the sources associated with Coating Line # 2.</p>		
14A. Provide the date of anticipated installation or change: <ul style="list-style-type: none"> If this is an After-The-Fact permit application, provide the date upon which the proposed change did happen: 06/14/2013 	14B. Date of anticipated Start-Up if a permit is granted: / /	
14C. Provide a Schedule of the planned Installation of/Change to and Start-Up of each of the units proposed in this permit application as Attachment C (if more than one unit is involved).		
15. Provide maximum projected Operating Schedule of activity/activities outlined in this application:		
Hours Per Day	Days Per Week	Weeks Per Year
16. Is demolition or physical renovation at an existing facility involved? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
17. Risk Management Plans. If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see www.epa.gov/ceppo), submit your Risk Management Plan (RMP) to U. S. EPA Region III.		
18. Regulatory Discussion. List all Federal and State air pollution control regulations that you believe are applicable to the proposed process (<i>if known</i>). A list of possible applicable requirements is also included in Attachment S of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance (<i>if known</i>). Provide this information as Attachment D .		
Section II. Additional attachments and supporting documents.		
19. Include a check payable to WVDEP – Division of Air Quality with the appropriate application fee (per 45CSR22 and 45CSR13).		
20. Include a Table of Contents as the first page of your application package.		
21. Provide a Plot Plan , e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as Attachment E (Refer to Plot Plan Guidance). <ul style="list-style-type: none"> Indicate the location of the nearest occupied structure (e.g. church, school, business, residence). 		
22. Provide a Detailed Process Flow Diagram(s) showing each proposed or modified emissions unit, emission point and control device as Attachment F .		
23. Provide a Process Description as Attachment G . <ul style="list-style-type: none"> Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable). 		
All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.		
24. Provide Material Safety Data Sheets (MSDS) for all materials processed, used or produced as Attachment H . <ul style="list-style-type: none"> For chemical processes, provide a MSDS for each compound emitted to the air. 		

25. Fill out the **Emission Units Table** and provide it as **Attachment I**.

26. Fill out the **Emission Points Data Summary Sheet (Table 1 and Table 2)** and provide it as **Attachment J**.

27. Fill out the **Fugitive Emissions Data Summary Sheet** and provide it as **Attachment K**.

28. Check all applicable **Emissions Unit Data Sheets** listed below:

<input type="checkbox"/> Bulk Liquid Transfer Operations	<input type="checkbox"/> Haul Road Emissions	<input type="checkbox"/> Quarry
<input type="checkbox"/> Chemical Processes	<input type="checkbox"/> Hot Mix Asphalt Plant	<input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities
<input type="checkbox"/> Concrete Batch Plant	<input type="checkbox"/> Incinerator	<input type="checkbox"/> Storage Tanks
<input type="checkbox"/> Grey Iron and Steel Foundry	<input type="checkbox"/> Indirect Heat Exchanger	
<input type="checkbox"/> General Emission Unit, specify		

Fill out and provide the **Emissions Unit Data Sheet(s)** as **Attachment L**.

29. Check all applicable **Air Pollution Control Device Sheets** listed below:

<input type="checkbox"/> Absorption Systems	<input type="checkbox"/> Baghouse	<input type="checkbox"/> Flare
<input type="checkbox"/> Adsorption Systems	<input type="checkbox"/> Condenser	<input type="checkbox"/> Mechanical Collector
<input type="checkbox"/> Afterburner	<input type="checkbox"/> Electrostatic Precipitator	<input type="checkbox"/> Wet Collecting System

Other Collectors, specify

Fill out and provide the **Air Pollution Control Device Sheet(s)** as **Attachment M**.

30. Provide all **Supporting Emissions Calculations** as **Attachment N**, or attach the calculations directly to the forms listed in Items 28 through 31.

31. **Monitoring, Recordkeeping, Reporting and Testing Plans.** Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as **Attachment O**.

➤ Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.

32. **Public Notice.** At the time that the application is submitted, place a **Class I Legal Advertisement** in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and **Example Legal Advertisement** for details). Please submit the **Affidavit of Publication** as **Attachment P** immediately upon receipt.

33. **Business Confidentiality Claims.** Does this application include confidential information (per 45CSR31)?

YES NO

➤ If **YES**, identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's **"Precautionary Notice – Claims of Confidentiality"** guidance found in the **General Instructions** as **Attachment Q**.

Section III. Certification of Information

34. **Authority/Delegation of Authority.** Only required when someone other than the responsible official signs the application. Check applicable **Authority Form** below:

<input type="checkbox"/> Authority of Corporation or Other Business Entity	<input type="checkbox"/> Authority of Partnership
<input type="checkbox"/> Authority of Governmental Agency	<input type="checkbox"/> Authority of Limited Partnership

Submit completed and signed **Authority Form** as **Attachment R**.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

35A. **Certification of Information.** To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

Certification of Truth, Accuracy, and Completeness

I, the undersigned **Responsible Official** / **Authorized Representative**, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

Compliance Certification

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE Mark Volkman
(Please use blue ink)

DATE: 8/5/2015
(Please use blue ink)

35B. Printed name of signee: Mark Volkman		35C. Title: Environmental, Health & Safety Director
35D. E-mail: MVolkman@jupiteraluminum.com	36E. Phone: (219) 933-2752	36F. FAX: (219) 933-2724
36A. Printed name of contact person (if different from above): Marjorie Fitzpatrick		36B. Title: Principal Project Manager
36C. E-mail: mfitzpatrick@iesengineers.com	36D. Phone: (610) 828-3078	36E. FAX: (610) 828-7842

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:

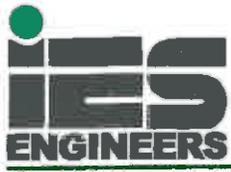
- Attachment A: Business Certificate
- Attachment B: Map(s)
- Attachment C: Installation and Start Up Schedule
- Attachment D: Regulatory Discussion
- Attachment E: Plot Plan
- Attachment F: Detailed Process Flow Diagram(s)
- Attachment G: Process Description
- Attachment H: Material Safety Data Sheets (MSDS)
- Attachment I: Emission Units Table
- Attachment J: Emission Points Data Summary Sheet
- Attachment K: Fugitive Emissions Data Summary Sheet
- Attachment L: Emissions Unit Data Sheet(s)
- Attachment M: Air Pollution Control Device Sheet(s)
- Attachment N: Supporting Emissions Calculations
- Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans
- Attachment P: Public Notice
- Attachment Q: Business Confidential Claims
- Attachment R: Authority Forms
- Attachment S: Title V Permit Revision Information
- Application Fee

Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.

FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:

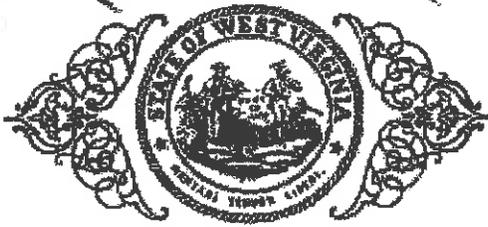
- Forward 1 copy of the application to the Title V Permitting Group and:
- For Title V Administrative Amendments:
 - NSR permit writer should notify Title V permit writer of draft permit,
- For Title V Minor Modifications:
 - Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,
 - NSR permit writer should notify Title V permit writer of draft permit.
- For Title V Significant Modifications processed in parallel with NSR Permit revision:
 - NSR permit writer should notify a Title V permit writer of draft permit,
 - Public notice should reference both 45CSR13 and Title V permits,
 - EPA has 45 day review period of a draft permit.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.



ATTACHMENT A
BUSINESS CERTIFICATE

State of West Virginia



Certificate

*I, Natalie E. Tennant, Secretary of State of the
State of West Virginia, hereby certify that*

JUPITER ALUMINUM CORPORATION

Control Number: 9A003

a corporation formed under the laws of Illinois has filed its "Application for Certificate of Authority" to transact business in West Virginia as required by the provisions of the West Virginia Code. I hereby declare the organization to be registered as a foreign corporation from its effective date of April 12, 2013.

Therefore, I issue this

CERTIFICATE OF AUTHORITY

to the corporation authorizing it to transact business in West Virginia

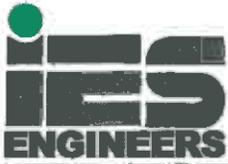


*Given under my hand and the
Great Seal of the State of
West Virginia on this day of
April 12, 2013*

Natalie E. Tennant

Secretary of State

ATTACHMENT G
PROCESS DESCRIPTION



**ATTACHMENT G
PROCESS DESCRIPTION**

Jupiter Aluminum Corporation (Jupiter) operates a coil coating operation in Beech Bottom, West Virginia. Jupiter purchased Coating Line # 1 and the Department approved the transfer of Permit No. R13-2379C and R30-00900004-2012 via letter dated June 14, 2013. These permits regulate Coating Line # 1 and Coating Line # 2. A copy of the approval letter is provided in Attachment 2.

The purpose of this application is to split the current operating permit into two permits and NSR permit into two permits and to make a number of other changes. Jupiter requests one operating permit and one NSR permit to include only the operating sources that are associated with Coating Line # 1 and the second operating permit and NSR permit to include the remainder of the sources associated with Coating Line # 2.

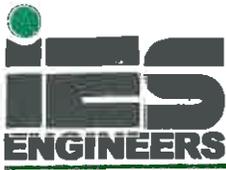
Upon receipt of the two new permits, Jupiter intends to transfer the NSR and Operating Permit associated with Coating Line #2 to Business Development Corporation of the Northern Panhandle.

Title V Operating Permit

Changes associated with Title V Operating Permit are presented below. A marked up version of the Title V Operating Permit for Coating Line #1 is shown in Attachment 3. The remaining permit conditions are associated with Coating Line #2.

1. Jupiter requests the following sources be included in a separate operating permit associated with Coating Line #2.

Emission Unit ID	Emission Point ID	Emission Unit Description
Coating Line #2		
008/1	Stack P15 Stack P18	CCL #2-Surface Treatment. The seven-stage surface treatment section consists of Stage 1 – alkaline sprays, Stage 2 – cold water brushing, Stage 3 – alkaline sprays, Stage 4 – hot water spray rinse, Stage 5 – phosphoric acid sprays, Stage 6 – hot water spray rinse, and Stage 7 – hot water spray rinse.
008/2	Stack P16	CCL#2-Drying Oven. Natural gas-fired oven to remove water from steel strip after exiting the surface treatment tanks and chemical roll coater and prior to the application of coating.
008/3	Stack P17	CCL#2-Coater. Top and bottom roll coater to apply coating to steel strip.
008/4	Stack P17	CCL#2-Curing Oven. Natural gas-fired oven to cure coating onto steel strip.
008/5	Stack P17	CCL#2-Quench Tank. Water sprays applied to cool steel strip exiting the curing oven.



Miscellaneous Plant Operations		
006-01	Roads and Parking Areas	Facility paved roads and parking lots
006-03	Roll Forming	Roll Forming
Control Devices		
CO3	17E	CCL #2 Regenerative Thermal Oxidizer

1. Remove CCL #1 Primer Quench Tank (Emission Unit ID 3S) and CCL #1 Finish Quench Tank (Emission Unit ID 4S) from the operating permit and remove the requirement to vent these two emission units to the RTO. These emission units do not emit any regulated air pollutants. Only water vapor is emitted. Coating application rooms (Emission Unit IDs 1S and 2S) emit volatile organic compounds (VOCs) which are vented to the RTO. Exhausting water vapor to the RTO can impact the integrity and efficiency of the RTO.
2. Remove four 25.2 MMBtu/hr boilers from the current operating permit. These boilers were replaced with one 8.65 MMBtu/hr boiler in 2013. Please add this boiler to the permit associated with Coating Line #1. The 8.65 MMBtu/hr boiler is an insignificant source as per Item 19 of the Insignificant Activities checklist. Insignificant activities that fall under Item 19 are provided in Attachment 2. The emissions of criteria pollutants (CO, NO_x, SO₂, VOC, and PM) from this boiler and Wastewater Treatment Plant are less than 1 pound per hour and less than 10,000 pounds per year for each pollutant.

Emission Unit ID	Emission Point ID	Emission Unit Description
Boilers		
003-01	Boiler #1	Cleaver Brooks natural gas boiler
003-02	Boiler #2	Cleaver Brooks natural gas boiler
003-03	Boiler #3	Cleaver Brooks natural gas boiler
003-04	Boiler #4	Cleaver Brooks natural gas boiler

3. Change the facility mailing address as follows:
8963 River Road, Wellsburg, WV, 26070
4. The physical address of the facility is:
8963 River Road, Beech Bottom, WV, 26030
5. Change the facility telephone number to 304-394-1559
6. The facility manufactures any type of metal coils. Please update facility description to read as "The Beech Bottom plant manufactures coated metal coils." Please update language in permit condition 5.1.17 to refer to "metal" instead of "steel."

NSR Permit

Changes associated with NSR Permit are presented below. A marked up version of the NSR permit associated with Coating Line #1 is shown in Attachment 4. The remaining permit conditions are associated with Coating Line #2.

1. Jupiter requests that the following conditions become part of the permit associated with Coating Line #2.
 - Section A, permit conditions 1 through 5
 - Section B, permit condition 2
2. Change the facility mailing address as follows:

8963 River Road, Wellsburg, WV, 26070
3. The physical address of the facility is:

8963 River Road, Beech Bottom, WV, 26030
4. The facility manufactures any type of metal coils. Please update language in the permit to “Metal Coil Coating Facility” instead of “Steel Coil Coating Facility.”
5. There is a discrepancy between emission point ID for CCL #1 Regenerative Thermal Oxidizer in operating permit and NSR permit. The ID used in Operating permit is 11E and used in NSR permit is 3E. Please fix the ID in NSR permit to make it consistent with the operating permit.
6. Remove the requirement to vent Primer Quench Tank (Emission Unit ID 3S) and Finish Quench Tank (Emission Unit ID 4S) to the RTO. These emission units do not emit any regulated air pollutants. Only water vapor is emitted. Coating application rooms (Emission Unit IDs 1S and 2S) emit volatile organic compounds (VOCs) which are vented to the RTO. Exhausting water vapor to the RTO can impact the integrity and efficiency of the RTO.

ATTACHMENT N
SUPPORTING EMISSION CALCULATIONS

**Jupiter Aluminum Corporation
Potential to Emit Emission Calculations from 8.65 MMBtu/hr Boiler**

Maximum Heat Input Rating	MMBtu/hr	8.65
Heating Value	Btu/scf	1020
Potential Operating Hours	hr/yr	8760
Annual Fuel Usage	MMscf/yr	74.29
Hourly Fuel usage	MMscf/hr	0.008

AP-42 Emission Factors (lb/MMscf)⁽¹⁾

Particulate matter	7.60
Sulfur Dioxide	0.60
Oxides of Nitrogen	100.00
Carbon Monoxide	84.00
Nonmethane Volatile Organic Compounds	5.50
All HAPs	1.89

Annual Emissions (Potential) ⁽²⁾	Emissions from One Boiler	
	lb/hr	lb/yr
Particulate matter	0.06	565
Sulfur Dioxide	0.005	45
Oxides of Nitrogen	0.848	7,429
Carbon Monoxide	0.712	6,240
Volatile Organic Compounds	0.05	409
Total HAPs	0.016	140

⁽¹⁾ Emission Factors for Natural Gas consumption are based on AP-42, "Compilation of Air Pollutant Emission Factors" Volume 1, Chapter 1.4, 7/98 update.

⁽²⁾ Potential annual emissions are based on an operating schedule of 8,760 hr/yr.

Jupiter Aluminum Corporation
Potential to Emit Emission Calculations from Four 25.2 MMBtu/hr Boilers

Maximum Heat Input Rating	MMBtu/hr	25.20
Heating Value	Btu/scf	1020
Potential Operating Hours	hr/yr	8760
Annual Fuel Usage	MMscf/yr	216.42
Hourly Fuel usage	MMscf/hr	0.025

AP-42 Emission Factors (lb/MMscf)⁽¹⁾

Particulate matter	7.60
Sulfur Dioxide	0.60
Oxides of Nitrogen	100.00
Carbon Monoxide	84.00
Nonmethane Volatile Organic Compounds	5.50
All HAPs	1.89

Annual Emissions (Potential) ⁽²⁾	Emissions from One Boiler		Emissions from Four Boilers	
	lb/hr	ton/yr	lb/hr	ton/yr
Particulate matter	0.19	0.82	0.75	3.29
Sulfur Dioxide	0.015	0.065	0.06	0.26
Oxides of Nitrogen	2.471	10.82	9.88	43.28
Carbon Monoxide	2.075	9.09	8.30	36.36
Volatile Organic Compounds	0.14	0.60	0.54	2.38
Total HAPs	0.047	0.20	0.19	0.82

⁽¹⁾ Emission Factors for Natural Gas consumption are based on AP-42, "Compilation of Air Pollutant Emission Factors" Volume 1, Chapter 1.4, 7/98 update.

⁽²⁾ Potential annual emissions are based on an operating schedule of 8,760 hr/yr.

**Jupiter Aluminum Corporation
Total Decrease in Emissions**

	Emissions Decrease from Sources that are Shut Down	Emissions Increase from New Insignificant Source	Total Decrease in Emissions
	Four 25.2 MMBtu/hr Boilers	8.65 MMBtu/hr Boiler	
	tpy	tpy	tpy
Particulate Matter	3.29	0.28	3.01
Sulfur Dioxide	0.26	0.022	0.24
Oxides of Nitrogen	43.28	3.71	39.57
Carbon Monoxide	36.36	3.12	33.24
Volatile Organic Compounds	2.38	0.2	2.18
Total HAPs	0.82	0.07	0.75

ATTACHMENT S
TITLE V PERMIT REVISION INFORMATION

Attachment S

Title V Permit Revision Information

1. New Applicable Requirements Summary

Mark all applicable requirements associated with the changes involved with this permit revision:

<input type="checkbox"/> SIP	<input type="checkbox"/> FIP
<input type="checkbox"/> Minor source NSR (45CSR13)	<input type="checkbox"/> PSD (45CSR14)
<input type="checkbox"/> NESHAP (45CSR15)	<input type="checkbox"/> Nonattainment NSR (45CSR19)
<input type="checkbox"/> Section 111 NSPS (Subpart(s) _____)	<input type="checkbox"/> Section 112(d) MACT standards (Subpart(s) _____)
<input type="checkbox"/> Section 112(g) Case-by-case MACT	<input type="checkbox"/> 112(r) RMP
<input type="checkbox"/> Section 112(i) Early reduction of HAP	<input type="checkbox"/> Consumer/commercial prod. reqts., section 183(e)
<input type="checkbox"/> Section 129 Standards/Reqts.	<input type="checkbox"/> Stratospheric ozone (Title VI)
<input type="checkbox"/> Tank vessel reqt., section 183(f)	<input type="checkbox"/> Emissions cap 45CSR§30-2.6.1
<input type="checkbox"/> NAAQS, increments or visibility (temp. sources)	<input type="checkbox"/> 45CSR27 State enforceable only rule
<input type="checkbox"/> 45CSR4 State enforceable only rule	<input type="checkbox"/> Acid Rain (Title IV, 45CSR33)
<input type="checkbox"/> Emissions Trading and Banking (45CSR28)	<input type="checkbox"/> Compliance Assurance Monitoring (40CFR64) ⁽¹⁾
<input type="checkbox"/> NO _x Budget Trading Program Non-EGUs (45CSR1)	<input type="checkbox"/> NO _x Budget Trading Program EGUs (45CSR26)

⁽¹⁾ If this box is checked, please include **Compliance Assurance Monitoring (CAM) Form(s)** for each Pollutants Specific Emission Unit (PSEU) (See Attachment H to Title V Application). If this box is not checked, please explain why **Compliance Assurance Monitoring** is not applicable:

2. Non Applicability Determinations

List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.

Permit Shield Requested *(not applicable to Minor Modifications)*

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

3. Suggested Title V Draft Permit Language

Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision? Yes No If Yes, describe the changes below.

Also, please provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e.g. 45CSR§7-4.1)) for those requirements being added / revised.

Please see Attachment 3 for marked up pages of current Title V Permit.

4. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
R13-2379C	03/15/2005	
	/ /	
	/ /	

5. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
	MM/DD/YYYY	
	/ /	
	/ /	

6. Change in Potential Emissions

Pollutant	Change in Potential Emissions (+ or -), TPY
Particulate matter	-3.01
Sulfur Dioxide	-0.24
Oxides of Nitrogen	-39.57
Carbon Monoxide	-33.24
Volatile Organic Compounds	-2.18
Total HAPs	-0.75

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.



ATTACHMENT 1

TRANSFER OF OWNERSHIP APPROVAL LETTER



west virginia department of environmental protection

Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Phone: 304/926-0475 • Fax: 304/926-0479

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

June 14, 2013

Mr. Patrick B. Ford, Executive Director
Business Development Corporation of the Northern Panhandle
3174 Pennsylvania Avenue, Suite 1
Weirton, WV 26062

RE: Transfer of Permit R13-2379C
Operating Permit R30-00900004-2012
Plant ID No. 009-00004
Rules 2/10A, 6, 7, 10B, 16, 25, 30 and 34
Beech Bottom, West Virginia

Dear Mr. Ford:

We are in receipt of your letter, dated March 1, 2013, wherein you acknowledged and confirmed the transfer of Permit R13-2379C previously issued to Severstal Wheeling, Inc., for the facility located at Route 2, Beech Bottom, West Virginia. We are also in receipt of your letter, dated May 31, 2013, wherein you acknowledged and confirmed the transfer from Business Development Corporation of the Northern Panhandle to Jupiter Aluminum Corporation.

The transfer of Regulation 13 Permit No. R13-2379C is hereby acknowledged based upon the facts stated in the above-referenced letters and the commitment by the Jupiter Aluminum Corporation to comply with all permit conditions and regulatory requirements applicable to the processes authorized in said permit. Permit R13-2379C and all associated information shall, henceforth, be filed under the name of Jupiter Aluminum Corporation.

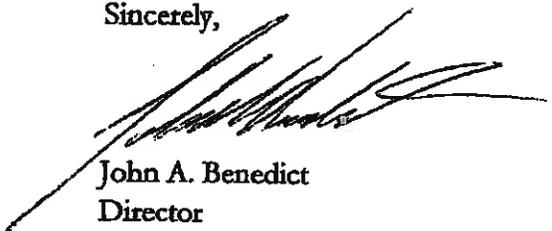
Letter to Patrick B. Ford, Executive Director

June 14, 2013

Page 2

Should you have any questions concerning this matter, please feel free to contact the Permitting Section at the address and telephone number listed above.

Sincerely,



John A. Benedict
Director

JAB/seh

- c: Ronald Knuckles, General Manager, Jupiter Aluminum Corporation, 1745 165th Street,
Hammond, IN 46320
Bud E. Smith, Director, Severstal Wheeling, Inc., 1134 Market Street, Wheeling, WV 26003
Megan Murphy
File Room
Stephanie Hammonds
-

ATTACHMENT 2
INSIGNIFICANT ACTIVITIES CHECKLIST

Insignificant Activities (Check all that apply) – Updated Item 19 only as it is relevant to this permit modification.

<input type="checkbox"/>	1. Air compressors and pneumatically operated equipment, including hand tools.
<input type="checkbox"/>	2. Air contaminant detectors or recorders, combustion controllers or shutoffs.
<input type="checkbox"/>	3. Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
<input type="checkbox"/>	4. Bathroom/toilet vent emissions.
<input type="checkbox"/>	5. Batteries and battery charging stations, except at battery manufacturing plants.
<input type="checkbox"/>	6. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
<input type="checkbox"/>	7. Blacksmith forges.
<input type="checkbox"/>	8. Boiler water treatment operations, not including cooling towers.
<input type="checkbox"/>	9. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
<input type="checkbox"/>	10. CO ₂ lasers, used only on metals and other materials which do not emit HAP in the process.
<input type="checkbox"/>	11. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
<input type="checkbox"/>	12. Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
<input type="checkbox"/>	13. Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
<input type="checkbox"/>	14. Demineralized water tanks and demineralizer vents.
<input type="checkbox"/>	15. Drop hammers or hydraulic presses for forging or metalworking.
<input type="checkbox"/>	16. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
<input type="checkbox"/>	17. Emergency (backup) electrical generators at residential locations.
<input type="checkbox"/>	18. Emergency road flares.
<input checked="" type="checkbox"/>	<p>19. Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO_x, SO₂, VOC and PM) into the atmosphere at a rate of less than 1 pound per hour and less than 10,000 pounds per year aggregate total for each criteria pollutant from all emission units.</p> <p>Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis:</p> <p><u>Wastewater Treatment Plant: 0.02 lbs VOC/hr; 175.2 lbs VOCs/year</u></p> <p><u>8.65 MMBtu/hr Natural Gas Fired Boiler: CO: 0.71 lb/hr and 6,240 lb/yr; NO_x: 0.85 lb/hr and 7,429 lb/yr; SO₂: 0.005 lb/hr and 45 lb/yr; VOC: 0.05 lb/hr and 409 lb/yr; PM: 0.06 lb/hr and 565 lb/yr</u></p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>

Insignificant Activities (Check all that apply) – Updated Item 19 only as it is relevant to this permit modification.

<input type="checkbox"/>	<p>20. Emission units which do not have any applicable requirements and which emit hazardous air pollutants into the atmosphere at a rate of less than 0.1 pounds per hour and less than 1,000 pounds per year aggregate total for all HAPs from all emission sources. This limitation cannot be used for any source which emits dioxin/furans nor for toxic air pollutants as per 45CSR27.</p> <p>Please specify all emission units for which this exemption applies along with the quantity of hazardous air pollutants emitted on an hourly and annual basis:</p> <p>_____</p>
<input type="checkbox"/>	<p>21. Environmental chambers not using hazardous air pollutant (HAP) gases.</p>
<input type="checkbox"/>	<p>22. Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.</p>
<input type="checkbox"/>	<p>23. Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.</p>
<input type="checkbox"/>	<p>24. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.</p>
<input type="checkbox"/>	<p>25. Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.</p>
<input type="checkbox"/>	<p>26. Fire suppression systems.</p>
<input type="checkbox"/>	<p>27. Firefighting equipment and the equipment used to train firefighters.</p>
<input type="checkbox"/>	<p>28. Flares used solely to indicate danger to the public.</p>
<input type="checkbox"/>	<p>29. Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.</p>
<input type="checkbox"/>	<p>30. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.</p>
<input type="checkbox"/>	<p>31. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.</p>
<input type="checkbox"/>	<p>32. Humidity chambers.</p>
<input type="checkbox"/>	<p>33. Hydraulic and hydrostatic testing equipment.</p>
<input type="checkbox"/>	<p>34. Indoor or outdoor kerosene heaters.</p>
<input type="checkbox"/>	<p>35. Internal combustion engines used for landscaping purposes.</p>
<input type="checkbox"/>	<p>36. Laser trimmers using dust collection to prevent fugitive emissions.</p>
<input type="checkbox"/>	<p>37. Laundry activities, except for dry-cleaning and steam boilers.</p>
<input type="checkbox"/>	<p>38. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.</p>

Insignificant Activities (Check all that apply) – Updated Item 19 only as it is relevant to this permit modification.	
<input type="checkbox"/>	39. Oxygen scavenging (de-aeration) of water.
<input type="checkbox"/>	40. Ozone generators.
<input type="checkbox"/>	41. Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must still get a permit if otherwise requested.)
<input type="checkbox"/>	42. Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
<input type="checkbox"/>	43. Process water filtration systems and demineralizers.
<input type="checkbox"/>	44. Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
<input type="checkbox"/>	45. Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
<input type="checkbox"/>	46. Routing calibration and maintenance of laboratory equipment or other analytical instruments.
<input type="checkbox"/>	47. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
<input type="checkbox"/>	48. Shock chambers.
<input type="checkbox"/>	49. Solar simulators.
<input type="checkbox"/>	50. Space heaters operating by direct heat transfer.
<input type="checkbox"/>	51. Steam cleaning operations.
<input type="checkbox"/>	52. Steam leaks.
<input type="checkbox"/>	53. Steam sterilizers.
<input type="checkbox"/>	54. Steam vents and safety relief valves.
<input type="checkbox"/>	55. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
<input type="checkbox"/>	56. Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
<input type="checkbox"/>	57. Such other sources or activities as the Director may determine.
<input type="checkbox"/>	58. Tobacco smoking rooms and areas.
<input type="checkbox"/>	59. Vents from continuous emissions monitors and other analyzers.

ATTACHMENT 3

MARKED UP PAGES OF CURRENT TITLE V OPERATING PERMIT
FOR COATING LINE # 1

Permit Number: **R30-00900004-2012**
Permittee: **Wheeling Corrugating Company**
Facility Name: **Beech Bottom Plant**
Mailing Address: **1134 Market Street, Wheeling, West Virginia 26003**

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location: **Beech Bottom, Brooke County, West Virginia**
Mailing Address: **1134 Market Street, Wheeling, West Virginia, 26003**
Telephone Number: **304-234-2662 304-394-1559**
Type of Business Entity: **Corporation**
Facility Description: **The Beech Bottom plant manufactures coated steel coils and formed steel siding and decking products.**
SIC Codes: **3479**
UTM Coordinates: **528.81 km Easting • 4452.42 km Northing • Zone 17**

**8963 River Road,
Wellsburg,
West Virginia 26070**

metal coils.

Permit Writer: Rex Compston, P.E.

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.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

1.0 Emission Units and Active R13, R14, and R19 Permits

1.1 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
Boilers					
003-01	Boiler #1	Cleaver Brooks natural gas boiler	1960	25.2 MMBTU/hr	None
003-02	Boiler #2	Cleaver Brooks natural gas boiler	1960	25.2 MMBTU/hr	None
003-03	Boiler #3	Cleaver Brooks natural gas boiler	1960	25.2 MMBTU/hr	None
003-04	Boiler #4	Cleaver Brooks natural gas boiler	1960	25.2 MMBTU/hr	None
Coating Line #1					
001-01	Surface Cleaning Section	Three hot rinse tanks, cold rinse tank, phosphoric acid rinse tank, zinc phosphating tank, cleaner, brush machine, and pre-clean tanks.	1960	N/A	None
001-02	Drying Oven	Natural gas fired oven to remove water from steel strip after exiting the cleaning tanks and chrome roll coater and prior to application of the primer coat.	1960	4 MMBTU/hr	None
1S	11E	CCL #1 Primer coating application room	2005	12 gal/hr	3C
2S	11E	CCL #1 Finish coating application room	2005	58 gal/hr	3C
3S	11E	CCL #1 Primer Quench	2005	16,200 gal/hr	3C
4S	11E	CCL #1 Finish Quench	2005	16,200 gal/hr	3C
7S	11E	CCL #1 Primer Curing Oven	2005	(3) 5 MMBTU/hr	3C
8S	11E	CCL #1 Finish Curing Oven	2005	(3) 5 MMBTU/hr	3C
Coating Line #2					
008/1	Stack P15	CCL #2-Surface Treatment. The seven-stage surface treatment section consists of Stage 1 – alkaline sprays, Stage 2 – cold water brushing, Stage 3 – alkaline sprays, Stage 4 – hot water spray-rinse, Stage 5 – phosphoric acid sprays, Stage 6 – hot water spray-rinse, and Stage 7 – hot water spray-rinse	2002	Exhaust fan rated at 5000 acfm	None
	Stack P18			Exhaust fan rated at 6000 acfm	

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
008/2	Stack P16	CCL#2-Drying Oven. Natural gas fired oven to remove water from steel strip after exiting the surface treatment tanks and chemical roll coater and prior to the application of coating.	2002	6-MMBTU/hr (Exhaust fan rated at 6500 acfm)	None
008/3	Stack P17	CCL#2-Coater. Top and bottom roll coater to apply coating to steel strip.	2002	38-gal/hr	CO3
008/4	Stack P17	CCL#2-Curing Oven. Natural gas fired oven to cure coating onto steel strip.	2002	12-MMBTU/hr	CO3
008/5	Stack P17	CCL#2-Quench Tank. Water sprays applied to cool steel strip exiting the curing oven.	2002	N/A	CO3
Miscellaneous Plant Operations					
006-01	Roads and Parking Areas	Facility paved roads and parking lots.	1960	N/A	None
006-03	Roll Forming	Roll forming	1960	N/A	None
Control Devices					
3C	11E	CCL #1 Regenerative Thermal Oxidizer	2005	(2) 9 MMBTU/hr	N/A
CO3	17E	CCL #2 Regenerative Thermal Oxidizer	2001	5-MMBTU/hr	N/A

1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-2379C	3/15/2005

4.0 Boilers [emission unit ID(s): 003-01, 003-02, 003-03, 003-04]

4.1. ~~Limitations and Standards~~

~~4.1.1. No person shall cause, suffer, allow, or permit emission of smoke and/or particulate matter into the open air from any fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average.~~

~~[45CSR§2-3.1.]~~

~~4.1.2. No person shall cause, suffer, allow, or permit the discharge of particulate matter into the open air from all fuel burning units located at one plant, measured in terms of pounds per hour in excess of the amount determined as follows:~~

~~For Type 'b' fuel burning units, the product of 0.09 and the total design heat inputs for such units in million BTU's per hour, provided however that no more than six hundred (600) pounds per hour of particulate matter shall be discharged into the open air from all such units. The heat input of the four boilers is 25.2 million BTU's per hour each. The calculated allowable particulate emission rate for the four boilers is 2.27 lbs/hr each.~~

~~[45CSR§2-4.1.b.]~~

~~4.1.3. At all times, including periods of start-ups, shutdowns and malfunctions, owners and operators shall, to the extent practicable, maintain and operate any fuel burning unit(s) including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, visible emission observations, review of operating and maintenance procedures and inspection of the source.~~

~~[45CSR§2-9.2.]~~

~~4.1.4. No person shall cause, suffer, allow, or permit the discharge of sulfur dioxide into the open air from all stacks located at one plant, measured in terms of pounds per hour, in excess of the amount determined as follows:~~

~~For Type 'b' and Type 'c' fuel burning units, the product of 3.1 and the total design heat inputs for such units discharging through those stacks in million BTU's per hour. The heat input of the four boilers are 25.2 million BTU's per hour. The calculated allowable sulfur dioxide emission rate for the four boilers is 78.12 lbs/hr each.~~

~~[45CSR§10-3.1.e.]~~

4.2. ~~Monitoring Requirements~~

~~4.2.1. N/A~~

4.3. ~~Testing Requirements~~

~~4.3.1. N/A~~

4.4. ~~Recordkeeping Requirements~~

~~4.4.1. The owner or operator of a fuel burning unit(s) shall maintain records of the operating schedule, and the quality and quantity of fuel burned in each fuel burning unit as specified below:~~

~~For fuel burning unit(s) which burn only pipeline quality natural gas, such records shall include, but not be limited to, the date and time of start-up and shutdown, and the quantity of fuel consumed on a monthly basis.~~

~~[45CSR§2A-7.1.a.]~~

4.5. Reporting Requirements

~~4.5.1. N/A~~

4.6. Compliance Plan

~~4.6.1. N/A~~

5.1.11. Emissions from the regenerative thermal oxidizer (3C) shall not exceed the following:

	RTO (3C)	
	lb/hr	tpy
PM	1.6	7.01
CO	4.03	17.65
NO _x	5.16	22.6
SO ₂	0.028	0.12
VOC	11.02	48.27
Methyl Isobutyl Ketone	1.04	1.46
Isophorone	2.09	2.93
Ethylbenzene	1.38	1.94
Formaldehyde	0.26	0.37
Hexane	0.002	0.008
Cumene	0.26	0.37
Napthalene	1.47	2.07
Xylene	4.63	6.51

[45CSR13, Permit No. R13-2379 -(Condition A.6.) (11E)]

5.1.12. A regenerative thermal oxidizer, identified in permit application R13-2379C as 3C, shall be installed, maintained, and operated so as to achieve a minimum 98.00% destruction efficiency in the control of Volatile Organic Compound (VOC) emissions from the Primer Oven (7S), Finishing Oven (8S), Primer Coater (1S), Primer Quench Tank (3S), Finish Coater (2S) and Finish Quench Tank (4S).

[45CSR13, Permit No. R13-2379 -(Condition A.7. and B.1.), 45CSR16, 40CFR§60.465(b)(1). (11E)]

5.1.13. The RTO (3C) shall be in operation at all times when the equipment listed in Condition 5.1.12 are in operation and shall not be by-passed, disconnected, or otherwise rendered ineffective in the control of VOCs. The permittee shall record any and all times when a violation of this condition occurs. The certified record shall contain, at a minimum, the amount of time the coating line was in operation without utilizing the thermal oxidizer and the cause for the shutdown.

The thermal oxidizer shall burn only natural gas as its supplementary fuel source. Alternative fuels may be used only after receiving prior written approval from the Director.

[45CSR13, Permit No. R13-2379 -(Condition A.8.) (3C)]

5.1.14. The maximum amount of natural gas fuel combusted in the following sources shall not exceed 48,000 cubic foot per hour nor 420,480,000 cubic feet per year:

Identification	Description
7S	Primer Oven
8S	Finishing Oven
3C	RTO

[45CSR13, Permit No. R13-2379 -(Condition A.9.) (3C, 7S, 8S)]

- 5.1.15. Use of any surface coating containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP and not listed below shall be in accordance with the following:
- a. The permittee shall notify the Director in writing of the surface coating to be used and the HAP(s) contained therein within thirty (30) days of the use of the surface coating. Additionally, an MSDS sheet for the surface coating shall be supplied at this time to the Director.
 - b. The use of the surface coating shall be incorporated into the record keeping requirements contained herein.

HAP	CAS Number	HAP	CAS Number
Cumene	98828	Xylene	1330207
Ethyl Benzene	100414	Isophorone	78591
Methyl Isobutyl Ketone	108101	Naphthalene	91203
Formaldehyde	50000		

[45CSR13, Permit No. R13-2379 -(Condition A.10.)]

- 5.1.16. The coater rooms shall be constructed in order to achieve 100 percent capture efficiency.
[45CSR13, Permit No. R13-2379 - (Condition A.11.)]
- 5.1.17. The permittee shall maintain records of the amount and type of coatings applied to the steel and VOC and HAP emissions for the coating lines. metal
[45CSR13, Permit No. R13-2379 - (Condition A.12.)]
- 5.1.18. No person shall cause, suffer, allow or permit any manufacturing process or storage structure 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.
[45CSR13, Permit No. R13-2379 - (Condition B.1. and B.3.), 45CSR§7-5.1]

5.2. Monitoring Requirements

- 5.2.1. Initially, monthly visual emission checks of each emission point subject to an opacity limit shall be conducted. For the purpose of these checks, excess visible emissions are to include visible fugitive dust emissions that leave the plant site boundaries. These checks shall be conducted during periods of facility operation for a sufficient time interval to determine if the unit has visible emissions using procedures

6.0 ~~Coating Line #2 [emission unit ID(s): 008/1, 008/2, 008/3, 008/4, 008/5; Control Device ID: CO3]~~

6.1. ~~Limitations and Standards~~

- ~~6.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any incinerator which is twenty (20) percent opacity or greater, except as noted in 6.1.2. [45CSR13, Permit No. R13-2379 - (Condition B.1.), 45CSR§6-4.3. (CO3)]~~
- ~~6.1.2. The provisions of Condition 6.1.1 shall not apply to smoke which is less than forty (40%) percent opacity, for a period or periods aggregating no more than eight (8) minutes per start-up. [45CSR13, Permit No. R13-2379 - (Condition B.1.), 45CSR§6-4.4. (CO3)]~~
- ~~6.1.3. No person shall cause, suffer, allow or permit emission 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, 3.3, 3.4, 3.5, 3.6, and 3.7. [45CSR§7-3.1, 45CSR13, Permit No. R13-2379 - (Condition B.1. and B.3.) (008/1, 008/2, CO3)]~~
- ~~6.1.4. The provisions of Condition 6.1.3 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, 45CSR13, Permit No. R13-2379 - (Condition B.1. and B.3.) (008/1, 008/2, CO3)]~~
- ~~6.1.5. 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 duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of the rule. The process weight rate for Coating Line #2 is 50,500 lbs/hr. The corresponding allowable particulate matter emission rate for Coil Coating Line #2, a type "b" source from Table 45-7A, is interpolated to be 31.31 lbs./hr. [45CSR§7-4.1, 45CSR13, Permit No. R13-2379 - (Condition B.1. and B.3.) (Coating Line #2)]~~
- ~~6.1.6. No person shall 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 from existing source operations, except as provided in 45CSR§§10-4.1.a through 4.1.e. [45CSR§10-4.1. (008/2, 17E)]~~
- ~~6.1.7. A thermal oxidizer, identified in permit application R13-2379 as CO3, shall be installed, maintained, and operated so as to achieve a minimum 98.00% destruction efficiency in the control of Volatile Organic Compound (VOC) emissions from the operations noted below and operate and monitor said CO3 according to the following conditions:~~
- ~~a. In accordance with the information filed in permit application R13-2379, its amendments, and any subsequent revisions thereto, the Coater Room identified as 008/3, the Curing oven identified as 008/4, and the Quench Tank identified as 008/5 shall be installed, maintained, and operated so as to utilize CO3 as a control of VOCs.~~
 - ~~b. The thermal oxidizer shall be in operation at all times when the equipment listed in 6.1.7.a are in operation and shall not be by-passed, disconnected, or otherwise rendered ineffective in the control of VOCs. The permittee shall record any and all times when a violation of 6.1.7.b occurs. The certified record shall contain, at a minimum, the amount of time the coating line was in operation without utilizing the thermal oxidizer and the cause for the shutdown.~~

- c. ~~The thermal oxidizer shall burn only natural gas as its supplementary fuel source. Alternative fuels may be used only after receiving prior written approval from the Director.~~
- d. ~~The thermal oxidizer shall maintain a combustion chamber temperature of no less than 1400 degrees Fahrenheit (760 degrees Celsius). The owner or operator shall install, calibrate, maintain, and continuously operate a monitoring device for the measurement of the thermal oxidizer combustion chamber temperature. The monitoring device is to be certified by the manufacturer to be accurate within ±1% in degrees Fahrenheit.~~
- e. ~~With respect to section 6.1.7.d, the minimum value specified is considered valid until such time as other values are established during an approved compliance demonstration that guarantees the required minimum destruction efficiency. Any change in required minimum, maximum, or range of values shall not become effective until approved by the Director of the Division of Air Quality.~~

~~[45CSR13, Permit No. R13-2379 - (Condition A.1.) (CO3)]~~

- 6.1.8. ~~Emissions from thermal oxidizer, identified as CO3, shall not exceed the following limits:~~

Pollutant	lbs/hr	tons/year
Carbon Monoxide (CO)	1.93	7.65
Oxides of Nitrogen (NO_x)	3.05	12.10
Sulfur Dioxide (SO₂)	0.01	0.05
Particulate Matter (PM₁₀)	0.17	0.69
Volatile Organic Compounds (VOCs)	2.90	11.53
Hazardous Air Pollutants (HAPs)	1.10	4.13

~~Compliance with the annual emission limits shall be determined using a 12-month rolling total.~~

~~Compliance with the more stringent particulate matter hourly limit ensures compliance with 45CSR§6-4.1. [45CSR§6-4.1, 45CSR13, Permit No. R13-2379 - (Condition A.2, B.1., and B.2.) (CO3)]~~

- 6.1.9. ~~Emissions from the chemical dryer identified as 008/2 shall not exceed the following limits:~~

Pollutant	lbs/hr	tons/year
Carbon Monoxide (CO)	0.50	1.70
Oxides of Nitrogen (NO_x)	0.60	2.38
Sulfur Dioxide (SO₂)	0.01	0.03
Particulate Matter (PM₁₀)	0.05	0.18
Volatile Organic Compounds (VOCs)	0.03	0.13

~~Compliance with the annual emission limits shall be determined using 12-month rolling totals. [45CSR13, Permit No. R13-2379 - (Condition A.3.) (008/2)]~~

- 6.1.10. ~~The maximum amount of natural gas fuel combusted in the following sources shall not exceed 23,000 cubic foot per hour nor 197,064,000 cubic feet per year:~~

Identification	Description
008/2	Chemical Dryer
008/4	Curing Oven
CO3	Thermal Oxidizer

~~Compliance with the combustion limit shall be determined using a 12 month rolling total. [45CSR13, Permit No. R13-2379 - (Condition A.4.) (008/2, 008/4, CO3)]~~

- 6.1.11. ~~Use of any surface coating containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP and not listed below shall be in accordance with the following:~~
- a. ~~The permittee shall notify the Director in writing of the surface coating to be used and the HAP(s) contained therein within thirty (30) days of the use of the surface coating. Additionally, an MSDS sheet for the surface coating shall be supplied at this time to the Director.~~
 - b. ~~The use of the surface coating shall be incorporated into the record keeping requirements contained herein.~~

HAP	CAS Number	HAP	CAS Number
Cumene	98828	Xylene	1330207
Ethyl Benzene	100414	Isophorone	78591
Methyl Isobutyl Ketone	108101	Naphthalene	91203
Formaldehyde	50000		

~~[45CSR13, Permit No. R13-2379 - (Condition A.10.)]~~

- 6.1.12. ~~The coater rooms shall be constructed in order to achieve 100 percent capture efficiency. [45CSR13, Permit No. R13-2379 - (Condition A.11.)]~~
- 6.1.13. ~~The permittee shall maintain records of the amount and type of coatings applied to the steel and VOC and HAP emissions for the coating lines. [45CSR13, Permit No. R13-2379 - (Condition A.12.)]~~
- 6.1.14. ~~No person shall cause, suffer, allow or permit any manufacturing process or storage structure 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. [45CSR13, Permit No. R13-2379 - (Condition B.1. and B.3.), 45CSR§7-5.1]~~

~~6.1.15. The Permittee must limit organic HAP emissions to the level specified:~~

- ~~a. No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction); or~~
- ~~b. No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or~~
- ~~c. If you use an oxidizer to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 percent.~~

~~[45CSR13, Permit No. R13-2379 -(Condition B.1 and B.7.), 45CSR34, 40CFR§63.5120(a). (CO3)]~~

~~6.1.16. The average combustion temperature of the regenerative thermal oxidizer shall be reduced to 3-hour block averages, and in any 3-hour period must not fall below 1661 degrees Fahrenheit.~~

~~[45CSR13, Permit No. R13-2379 -(Condition B.1, B.5, and B.7.), 45CSR16, 45CSR34, 40CFR§60.465(b)(2), 40CFR§63.5160(d)(3)(i), and 40CFR§63.5121(a). (CO3)]~~

~~6.1.17. The Permittee shall not cause to be discharged into the atmosphere more than:~~

- ~~a. 0.14 kg VOC/l of coating solids applied for each calendar month for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or~~
- ~~b. 10 percent of the VOC's applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency.~~

~~[45CSR13, Permit No. R13-2379 - (Condition B.1. and B.5.), 45CSR16, 40CFR§60.460(a), 40CFR§60.462. (CO3)]~~

6.2. Monitoring Requirements

~~6.2.1. At least monthly, visual emission checks of each emission point subject to an opacity limit shall be conducted. For the purpose of these checks, excess visible emissions are to include visible fugitive dust emissions that leave the plant site boundaries. These checks shall be conducted during periods of 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 40CFR60, Appendix A, Method 9 evaluation within seventy-two (72) 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. If visible emissions are not identified from Method 22 during six (6) consecutive months, the emissions checks need only be once per quarter. If visible emissions are identified from Method 22 at any emission check, the Permittee must start over with another six (6) consecutive months of no visible emissions detected before going to quarterly monitoring.~~

~~[45CSR§30-5.1.c (CO3)]~~

~~6.2.2. At least monthly, 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 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 an evaluation as outlined in 45CSR§7A-2.1.a,b within seventy-two (72) hours. A 45CSR§7A-2.1.a,b 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. If visible emissions are not identified from Method 22 during six (6) consecutive months, the emissions checks need only be once per quarter. If visible emissions are identified from Method 22 at any emission check, the Permittee must start over with another six (6) consecutive months of no visible emissions detected before going to quarterly monitoring.~~

~~[45CSR§7A-2.1.a,b (008/1, 008/2, CO3)]~~

~~6.2.3. The permittee employs a regenerative thermal oxidizer to comply with the requirements of the standards in Condition 6.1.15 and demonstrates continuous compliance through monitoring of a thermal oxidizer combustion chamber temperature as provided in paragraphs (a) and (b). The Permittee shall:~~

- ~~a. Install, calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months; or the chart recorder, data logger, or temperature indicator must be replaced. The permittee must replace the equipment either if you choose not to perform the calibration, or if the equipment cannot be calibrated properly. Each temperature monitoring device must be equipped with a continuous recorder. The device must have an accuracy of ± 1 percent of the temperature being monitored in degrees Celsius, or ± 1 Celsius, whichever is greater.~~
- ~~b. For an oxidizer other than a catalytic oxidizer, to demonstrate continuous compliance with the operating limit established according to Condition 6.1.16, the Permittee shall install the thermocouple or temperature sensor in the combustion chamber at a location in the combustion zone.~~
- ~~c. The temperature data shall be reduced to 3-hour block averages.~~
- ~~d. Maintain the 3-hour average combustion temperature at or above 1661 degrees Fahrenheit.~~

~~[45CSR13, Permit No. R13-2379 -(Condition B.1. and B.7.), 45CSR34, 40CFR§63.5150(a)(3) and 40CFR§63.5121(a) (CO3)]~~

~~6.2.4. The permittee complies with the requirements of the standards in Condition 6.1.15 through the use of a capture system and control device, and has developed a capture system monitoring plan containing the information specified in paragraphs (a) and (b). The permittee monitors the capture system in accordance with paragraph (c) of this section. The monitoring plan is available for inspection by the permitting authority upon request.~~

- ~~a. The monitoring plan must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.~~

- ~~b. The plan also must specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the standards in Condition 6.1.15. The operating limits must represent the conditions indicative of proper operation and maintenance of the capture system.~~
- ~~c. The permittee must conduct monitoring in accordance with the plan.~~

~~[45CSR13, Permit No. R13-2379 -(Condition B.1. and B.7.), 45CSR34, 40CFR§63.5150(a)(4)]~~

~~6.2.5. Compliance with Conditions 6.1.12 shall be shown by a pressure drop across the coating room of at least 0.007 inches H₂O. The Permittee shall take pressure drop measurements at least 1/shift.
[45CSR§30-5.1.c]~~

~~6.2.6. The Permittee shall include all coating materials (as defined in 40CFR§63.5110) used in the affected source when determining compliance with Condition 6.1.15. To make this determination, the Permittee shall use at least one of the four compliance options listed below:~~

~~a. Use of "as purchased" compliant coatings:~~

- ~~1. Each coating material used during the 12-month compliance period does not exceed 0.046 kg HAP per liter solids, as purchased. Compliance shall be shown by 40CFR§63.5170(a).~~

~~b. Use of "as applied" compliant coatings:~~

- ~~1. Each coating material used does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. Compliance shall be shown by 40CFR§63.5170(b)(1).~~
- ~~2. Average of all coating materials used does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. Compliance shall be shown by 40CFR§63.5170(b)(2).~~

~~c. Use of a capture system and control device:~~

- ~~1. Overall organic HAP control efficiency is at least 98 percent on a monthly basis for individual or groups of coil coating lines; or overall organic HAP control efficiency is at least 98 percent during initial performance test and operating limits are achieved continuously for individual coil coating lines; or oxidizer outlet HAP concentration is no greater than 20 ppmv and there is 100 percent capture efficiency during initial performance test and operating limits are achieved continuously for individual coil coating lines. Compliance shall be shown by 40CFR§63.5170(c).~~

~~d. Use of a combination of compliant coatings and control devices and maintaining an acceptable equivalent emission rate:~~

- ~~1. Average equivalent emission rate does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. Compliance shall be shown by 40CFR§63.5170(c).~~

~~The Permittee may apply any of the compliance options to an individual coil coating line, or to multiple lines as a group, or to the entire affected source. The Permittee may use different compliance options for different coil coating lines, or at different times on the same line. However, the Permittee may not use~~

~~different compliance options at the same time on the same coil coating line. If the Permittee switches between compliance options for any coil coating line or group of lines, they shall document the switch as required by 6.4.3, and the Permittee must report it in the next semiannual compliance report required in 6.5.2.~~

~~[45CSR13, Permit No. R13-2379 -(Condition B.1. and B.7.), 45CSR34, 40CFR§63.5170]~~

6.3. Testing Requirements

- 6.3.1. ~~Compliance with 40CFR60, Subparts A and TT testing requirements for Coil Coating Line #2 shall be demonstrated as follows:~~
- a. ~~The owner or operator of an affected facility shall conduct an initial performance test as required under 40CFR§60.8(a) and thereafter a performance test for each calendar month for each affected facility according to the procedures in 40CFR§60.463.~~
 - b. ~~Tests that are required by the Director to determine compliance with the destruction efficiency as set forth in Condition 6.1.7 of this permit shall be conducted in accordance with the methods as set forth below. The Director may require a different test method or approve an alternative method in light of any new technology advancements that may occur. Compliance testing shall be conducted at the maximum permitted operating conditions unless otherwise specified by the Director. Should the maximum permitted operating conditions allowed in this permit not be attainable during the initial compliance testing, then the facility shall be limited in operation to the maximum operating conditions attained during testing. The permittee shall again be required to perform such compliance testing when maximum permitted operating conditions are attainable. The maximum operating conditions attained during compliance testing shall be the maximum operating conditions allowed by this permit.~~
 1. ~~Tests to determine compliance with VOC emission limits shall be conducted in accordance with Method 25, or 25A as set forth in 40.CFR 60, Appendix A.~~
 - c. ~~With regard to testing required by the Director, the permittee shall submit to the Director of Air Quality a test protocol detailing the proposed test methods, the date, and the time the proposed testing is to take place, as well as identifying the sampling locations and other relevant information. The test protocol shall include the procedure for the determination of the maximum unit capacity (maximum airflow through Regenerative thermal oxidizer CO3) and the operational constraint(s) placed on the system that shall not allow operation of CO3 above this maximum capacity. The test protocol must be received by the Director no less than thirty (30) days prior to the date the testing is to take place. Test results shall be submitted to the Director within thirty (30) days after the stack testing completion date.~~

~~[45CSR13, Permit No. R13-2379 -(Condition B.1., B.5., and B.8.), 45CSR16, 40CFR§60.463]~~

- 6.3.2. ~~The permittee has determined capture efficiency to meet the requirements of 40CFR§§63.5170(i)(2) through (3) and employed the procedures in paragraphs (a) or (b).~~
- a. ~~For an enclosure that meets the criteria for a PTE, you may assume it achieves 100 percent capture efficiency. You must confirm that your capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40 CFR part 51, appendix M (or an EPA approved alternative method), and that all exhaust gases from the enclosure are delivered to a control device.~~
 - b. ~~You may determine capture efficiency, CE, according to the protocols for testing with temporary total enclosures that are specified in Method 204A through F of 40.CFR part 51, appendix M.~~

~~[45CSR13, Permit No. R13-2379 -(Condition B.1.), 45CSR34, 40CFR§63.5160]~~

6.4. Recordkeeping Requirements

- ~~6.4.1. Compliance with the particulate matter and sulfur dioxide emission limitation established in Coil Coating Line #2 shall be demonstrated as follows:~~
- ~~a. Demonstrate that natural gas was used as the only fuel~~
 - ~~b. Continual compliance shall be demonstrated by maintaining records of fuel usage.~~
 - ~~c. The average combustion chamber temperature during all of the regenerative thermal oxidizer cycles is a minimum of 1661 degrees Fahrenheit via a 3-hour block average.~~
 - ~~1. The permittee shall provide continuous monitoring of the combustion chamber temperature of the thermal oxidizers.~~

~~[45CSR§30-5.1.c (CO3)]~~

- ~~6.4.2. Compliance with 40 CFR 60, Subpart TT monitoring and recordkeeping requirements for Coil Coating Line #2 shall be demonstrated as follows:~~
- ~~a. The facility shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with Condition 6.1.17. This device shall have an accuracy of $\pm 2.5^{\circ}\text{C}$ or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. Each owner or operator shall also record all periods (during actual coating operations) in excess of three hours during which the average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28°C (50°F) below the temperature at which compliance with Condition 6.1.17 was demonstrated during the most recent measurement of incinerator efficiency required by 40CFR§60.8. The records required by 40CFR§60.7 shall identify each such occurrence and its duration.~~
 - ~~b. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution equipment in a manner consistent with good air pollution control practice for minimizing emissions.~~
 - ~~c. Each owner or operator subject to the provisions of 40 CFR 60, Subpart TT shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion temperature.~~

~~[45CSR13, Permit No. R13-2379 - (Condition B.1. and B.5.), 45CSR16, 40CFR§60.464(c), 40CFR§60.465(e), 40CFR§60.11(d)]~~

- ~~6.4.3. 40CFR§63.5190(a) The permittee shall maintain records specified in this Condition in accordance with 40CFR§63.10(b)(1):~~
- ~~a. Records of the coating lines on which you used each compliance option and the time periods (beginning and ending dates and times) you used each option.~~
 - ~~b. Records specified in 40CFR§63.10(b)(2) of all measurements needed to demonstrate compliance with 40 C.F.R. 63, Subpart SSSS, including:~~

- ~~1. Continuous emission monitor data in accordance with 40CFR§63.5150(a)(2);~~
 - ~~2. Control device and capture system operating parameter data in accordance with 40CFR§§63.5150(a)(1), (3), and (4);~~
 - ~~3. Organic HAP content data for the purpose of demonstrating compliance in accordance with 40CFR§63.5160(b);~~
 - ~~4. Volatile matter and solids content data for the purpose of demonstrating compliance in accordance with 40CFR§63.5160(c);~~
 - ~~5. Overall control efficiency determination or alternative outlet HAP concentration using capture efficiency tests and control device destruction or removal efficiency tests in accordance with 40CFR§§63.5160(d), (e), and (f); and~~
 - ~~6. Material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with 40CFR§§63.5170(a), (b), and (d);~~
- ~~c. Records specified in 40CFR§63.10(b)(3); and~~
- ~~d. Additional records specified in 40CFR§63.10(c) for each continuous monitoring system operated by the owner or operator in accordance with 40CFR§63.5150(a)(2).~~

~~[45CSR13, Permit No. R13-2379 - (Condition B.1.), 45CSR34, 40CFR§63.5190(a)]~~

- ~~6.4.4. For the purposes of determining compliance with the limits set forth in Conditions 6.1.8 and 6.1.9, the permittee shall maintain records of the following:~~
- ~~1. The name of each surface coating, as applied; and~~
 - ~~2. The mass of VOC, HAP, and solids per volume of each surface coating and the volume of each surface coating, as applied, used each month.~~

~~Additionally, within fifteen (15) days of the last day of each month, the permittee shall create a summary report that contains the following information: hourly, monthly, and rolling yearly emission rates for VOCs and aggregate and speciated HAPs from Emission Points P16 and P17. Said records shall be maintained on-site for a period of five (5) years and shall be certified and made available to the Director of the Division of Air Quality or his/her duly authorized representative upon request.~~

~~[45CSR13, Permit No. R13-2379 - (Condition B.10.)]~~

- ~~6.4.5. For the purposes of determining compliance with the maximum fuel usage limits set forth in Condition 6.1.10, the permittee shall maintain accurate records of the hours of operation and the aggregate amount of natural gas consumed by the equipment therein. Said records shall be certified by a responsible official and shall be maintained on-site for a period of five (5) years. Said records shall be made available to the Director of the Division of Air Quality or his/her duly authorized representative upon request.~~
- ~~[45CSR13, Permit No. R13-2379 - (Condition B.11.)]~~

6.5. Reporting Requirements

- ~~6.5.1. Compliance with 40CFR60, Subpart TT reporting requirements for Coil Coating Line #2 shall be demonstrated as follows:~~

- ~~a. If 6.1.17.a is used to show compliance for the Condition 6.1.17 VOC emission limits, the facility shall identify, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under 40CFR§60.462. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.~~
- ~~b. The facility shall also submit reports at the frequency specified in 40CFR§60.7(c) semiannually when the incinerator temperature drops as defined under Condition 6.4.2. If no such periods occur, the owner or operator shall state this in the semiannual report.~~

~~[45CSR13, Permit No. R13-2379 -(Condition B.1. and B.5.), 45CSR16, 40CFR§§60.465(c) and (d)]~~

~~6.5.2. The Permittee shall submit the reports specified in paragraphs (a) through (c) of this section to USEPA Region III and to the delegated State agency:~~

- ~~a. The permittee employs a regenerative thermal oxidizer and shall submit start-up, shutdown, and malfunction reports as specified in 40CFR§63.10(d)(5). If your actions during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in 40CFR§63.6(e)(3), you must state such information in the report. The start-up, shutdown, or malfunction report will consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy. Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in 6.5.2.b.~~
- ~~b. The permittee must submit semi-annual compliance reports containing the information specified in paragraphs (b)(1) and (2) of this section.~~
 - ~~1. Compliance report dates.~~
 - ~~i. The first compliance report period ends on December 31.~~
 - ~~ii. The first compliance report must be postmarked or delivered no later than January 31,~~
 - ~~iii. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.~~
 - ~~iv. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31.~~
 - ~~v. For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to 40CFR§70.6(a)(3)(iii)(A) or 40CFR§71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1)(i) through (iv) of this section.~~
 - ~~2. The semi-annual compliance report must contain the following information:~~
 - ~~i. Company name and address.~~
 - ~~ii. Statement by a responsible official with that official's name, title, and signature, certifying the accuracy of the content of the report.~~

- ~~iii. Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.~~
- ~~iv. Identification of the compliance option or options specified in Table 1 to 40CFR§63.5170 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning dates you used each option.~~
- ~~v. A statement that there were no deviations from the standards during the reporting period.~~
- ~~c. The permittee shall submit, for each deviation occurring at CCL#2 the semi-annual compliance report containing the information in paragraphs (b)(2)(i) through (iv) of this Condition and the information in paragraphs (c)(1) through (3) of this paragraph:
 - ~~1. The total operating time of each affected source during the reporting period.,~~
 - ~~2. Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable, and the corrective action taken monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes.~~
 - ~~3. Information on the number, duration, and cause for monitor downtime incidents (including unknown cause other than downtime associated with zero and span and other daily calibrations checks, if applicable).~~~~

~~[45CSR13, Permit No. R13-2379-(Condition B.1.), 45CSR34, 40CFR§63.5180(a)]~~

6.6. Compliance Plan

6.6.1. N/A

7.0 Source-Specific Requirements [Miscellaneous Plant Operations]

7.1. Limitations and Standards

- ~~7.1.1. The permittee shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.
[45CSR13, Permit No. R13-2379 - (Condition B.1. and B.3.) and 45CSR§7-5.2. (006-01)]~~

7.2. Monitoring Requirements

- ~~7.2.1. N/A.~~

7.3. Testing Requirements

- ~~7.3.1. N/A.~~

7.4. Recordkeeping Requirements

- ~~7.4.1. The facility shall keep records of date and quantities of material applied for each dust suppressant application.
[45CSR§30-5.1.c].~~

7.5. Reporting Requirements

- ~~7.5.1. N/A.~~

7.6. Compliance Plan

- ~~7.6.1. N/A.~~

ATTACHMENT 4
MARKED UP PAGES OF CURRENT NSR PERMIT
FOR COATING LINE #1



west virginia department of environmental protection

Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Phone: (304) 926-0475 • Fax: (304) 926-0479

Joe Manchin, III
Governor
www.wvdep.org

**PERMIT TO MODIFY
A STEEL COIL COATING FACILITY**

IN ACCORDANCE WITH THE WEST VIRGINIA AIR POLLUTION CONTROL LAW (W. Va. Code §§22-5-1 et seq.), AND REGULATIONS PROMULGATED THEREUNDER, THE FOLLOWING PERMITTEE IS AUTHORIZED TO CONSTRUCT, SUBJECT TO THE TERMS AND CONDITIONS OF THIS PERMIT, THE SOURCE DESCRIBED BELOW.

This permit will supersede and replace Permit R13-2379b

Name of Permittee: ~~Wheeling Corrugating Company~~ **Jupiter Aluminum Corporation**

Name of Facility: ~~Beech Bottom Facility~~ **Jupiter Coil Coating**

Permit No.: R13-2379C

Plant ID No.: 009-00004

Effective Date of Permit: March 15, 2005

Permit Writer: Steven R. Pursley, PE

Facility Mailing Address: ~~P.O. Box 39
Beech Bottom, WV 26030~~ **8963 River Road,
Wellsburg, WV 26070**

County: Brooke

Nearest City or Town: Beech Bottom, WV

UTM Coordinates: Easting: 529.156 km Northing: 4451.53 km Zone: 17

Directions to Exact Location: Facility is located on the west side of WV St. Rt. 2 just south of Beech Bottom.

Type of Facility or Modification: Application for the installation of coating line #1 replacement ovens, improvements to the coating room enclosures and the replacement of existing incinerators with a regenerative thermal oxidizer. Note that many of the changes result from the need to comply with 40 CFR 63 Subpart SSSS.

IN ACCORDANCE WITH THE PERMIT APPLICATION AND ITS AMENDMENTS, THIS PERMIT IS LIMITED AS FOLLOWS:

A. SPECIFIC REQUIREMENTS

~~COIL COATING LINE 2~~

- ~~1. A thermal oxidizer, identified in permit application R13-2379 as CO3, shall be installed, maintained, and operated so as to achieve a minimum 98.00% destruction efficiency in the control of Volatile Organic Compound (VOC) emissions from the operations noted below and operate and monitor said CO3 according to the following conditions:~~
 - ~~a. In accordance with the information filed in permit application R13-2379, its amendments, and any subsequent revisions thereto, the Coater Room identified as 008/3, the Curing oven identified as 008/4, and the Quench Tank identified as 008/5 shall be installed, maintained, and operated so as to utilize CO3 as a control of VOCs.~~
 - ~~b. The thermal oxidizer shall be in operation at all times when the equipment listed in 1.a are in operation and shall not be by-passed, disconnected, or otherwise rendered ineffective in the control of VOCs. The permittee shall record any and all times when a violation of 1.b occurs. The certified record shall contain, at a minimum, the amount of time the coating line was in operation without utilizing the thermal oxidizer and the cause for the shutdown.~~
 - ~~c. The thermal oxidizer shall burn only natural gas as its supplementary fuel source. Alternative fuels may be used only after receiving prior written approval from the Director.~~
 - ~~d. The thermal oxidizer shall maintain a combustion chamber temperature of no less than 1400 degrees Fahrenheit (760 degrees Celsius). The owner or operator shall install, calibrate, maintain, and continuously operate a monitoring device for the measurement of the thermal oxidizer combustion chamber temperature. The monitoring device is to be certified by the manufacturer to be accurate within $\pm 1\%$ in degrees Fahrenheit.~~
 - ~~e. With respect to section A.1.d, the minimum value specified is considered valid until such time as other values are established during an approved compliance demonstration that guarantee the required minimum destruction efficiency. Any change in required minimum, maximum, or range of values shall not become effective until approved by the Director of the Division of Air Quality.~~

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Wheeling Corrugating Company
Beech Bottom Facility

- ~~2. Emissions from thermal oxidizer, identified in permit application R13-2379 as CO3, shall not exceed the following limits:~~

Pollutant	lbs/hr	tons/year
Carbon Monoxide (CO)	1.93	7.65
Oxides of Nitrogen (NO_x)	3.05	12.10
Sulfur Dioxide (SO₂)	0.01	0.05
Particulate Matter (PM₁₀)	0.17	0.69
Volatile Organic Compounds (VOCs)	2.90	11.53
Hazardous Air Pollutants (HAPs)	1.10	4.13

~~Compliance with the annual emission limits shall be determined using a 12-month rolling total.~~

- ~~3. Emissions from the chemical dryer identified in permit application R13-2379 as 008-1 shall not exceed the following limits:~~

Pollutant	lbs/hr	tons/year
Carbon Monoxide (CO)	0.50	1.70
Oxides of Nitrogen (NO_x)	0.60	2.38
Sulfur Dioxide (SO₂)	0.01	0.03
Particulate Matter (PM₁₀)	0.05	0.18
Volatile Organic Compounds (VOCs)	0.03	0.13

~~Compliance with the annual emission limits shall be determined using 12-month rolling totals.~~

- ~~4. The maximum amount of natural gas fuel combusted in the following sources shall not exceed 23,000 cubic foot per hour nor 197,064,000 cubic feet per year.~~

Identification	Description
008-1	Chemical Dryer
008-3	Curing Oven
CO3	Thermal Oxidizer

12. The permittee shall maintain records of the amount and type of coatings applied to the steel and VOC and HAP emissions for the coating lines.
~~metal~~

B. OTHER REQUIREMENTS

1. The permittee shall comply with all applicable provisions of 45CSR6, 45CSR7, 45CSR13, 45CSR16, 45CSR30, 40 CFR 60 Subpart TT and 40 CFR 63 Subpart SSSS, provided that the permittee shall comply with any more stringent requirements as may be set forth under Specific Requirements, Section (A) of this permit. Legislative Rule 45CSR16 incorporates therein 40 CFR 60.
- ~~2. The pertinent sections of 45CSR6 applicable to the regenerative thermal oxidizer, identified in permit application R13-2379 as CO3, include, but are not limited to, the following:~~

~~§45-6-4.1.~~

~~No person shall cause, suffer, allow or permit particulate matter to be discharged from any incinerator into the open air in excess of the quantity determined by use of the following formula:~~

~~Emissions (lb/hr) = F x Incinerator Capacity (tons/hr)~~

~~Where, the Factor, F, is as indicated in Table I below:~~

Table I: Factor, F, for Determining Maximum Allowable Particulate Emissions	
Incinerator Capacity	F Factor
A. Less than 15,000 lbs/hr	5.43
B. 15,000 lbs/hr or greater	2.72

~~§45-6-7.1~~

~~At such reasonable times as the Director may designate, the operator of any incinerator shall be required to conduct or have conducted stack tests to determine the particulate matter loading, by using 40 CFR Part 60, Appendix A, Method 5 or other equivalent EPA approved method approved by the Director, in exhaust gases. Such tests shall be conducted in such manner as the Director may specify and be filed on forms and in a manner acceptable to the Director. The Director, or the Director's authorized representative, may at the Director's option witness or conduct such stack tests. Should the Director exercise his option to conduct such tests, the operator will provide all the necessary sampling connections and sampling ports to be located in such manner as the Director~~

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 Wheeling Corrugating Company
 Beech Bottom Facility

~~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.~~

~~§45-6-7.2.~~

~~The Director, or the Director's duly authorized representative, may conduct such other tests as the Director may deem necessary to evaluate air pollution emissions other than those noted above.~~

3. The operation of this facility is subject to requirements of 45CSR7. Pertinent sections applying to this operation include, but are not limited to:

§45-7-3.1

No person shall cause, suffer, allow, or permit emissions of smoke and/or particulate matter into the open air from any process source operation greater than twenty (20) percent opacity, except as noted in subsections 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7.

§45-7-3.2

The provisions of subsection 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.

§45-7-3.7

No person shall cause, suffer, allow, or permit visible emissions from any storage structure(s) associated with any manufacturing process(es) that pursuant to subsection 5.1 is required to have a full enclosure and be equipped with a particulate matter control device.

§45-7-4.1

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 duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of this rule.

§45-7-5.1

No person shall cause, suffer, allow or permit any manufacturing process or storage structure 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.

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~~Compliance with the combustion limit shall be determined using a 12 month rolling total.~~

- ~~5. Within sixty (60) days after achieving the maximum production rate at which the facility will be operated and within one hundred eighty (180) days after startup, and at such times as may be required by the USEPA Administrator or the Director, the permittee shall conduct a performance test which will demonstrate the destruction efficiency of VOC's by the thermal oxidizer (G03). The tests shall be conducted in accordance with OTHER REQUIREMENTS B.7 and B.6.~~

COIL COATING LINE 1

6. Emissions from the RTO (emission point 3E) shall not exceed the following:

	RTO (3E)	
	lb/hr	tpy
PM	1.6	7.01
CO	4.03	17.65
NO _x	5.16	22.6
SO ₂	0.028	0.12
VOC	11.02	48.27
Methyl Isobutyl Ketone	1.04	1.46
Isophorone	2.09	2.93
Ethylbenzene	1.38	1.94
Formaldehyde	0.26	0.37
Hexane	0.002	0.008
Cumene	0.26	0.37
Napthalene	1.47	2.07
Xylene	4.63	6.51

7. A regenerative thermal oxidizer, identified in permit application R13-2379C as 3C, shall be installed, maintained, and operated so as to achieve a minimum 98.00% destruction efficiency in the control of Volatile Organic Compound (VOC) emissions from the Primer Oven (7S), Finishing Oven (8S), Primer Coater (1S), ~~Primer Quench Tank (3S)~~, Finish Coater (2S) and ~~Finish Quench Tank (4S)~~.
8. The RTO (3C) shall be in operation at all times when the equipment listed in A.7 are in operation and shall not be by-passed, disconnected, or otherwise rendered ineffective in the control of VOCs. The permittee shall record any and