

To: File  
From: John Legg  
Date: August 26, 2015



Subject: R13-3265 - Class I Administrative Update  
Jupiter Aluminum Corporation (Jupiter)  
Jupiter Coil Coating  
Company ID No.: 009-00004

This Class I Administrative Update is for a coil coating facility operated in Beech Bottom, Brooke County, WV. It was received on August 8, 2015 and assigned to the writer on August 11, 2015. The purpose of the update was:

To split R13-2379C into two permits. R13-2379D was to include only the operating sources that are associated with Coating Line #1. R13-3265 was to include the remainder of the sources associated with Coating Line #2. Both permits were to be issued to Jupiter.

According to the permit application (R13-2379D), Jupiter intends to transfer the permit (R13-3265) associated with Coating Line #2 to Business Development Corporation of the Northern Panhandle.

### **Compare File**

A compare file is attached to this evaluation. It details the changes made to Permit R13-2379C to arrive at Permit R13-3265. A few of the changes made to the resulting permit require some additional explanation which is provided below:

- The facility manufactures “metal” coils, not just “steel” coils. The permit language was changed:
  - in the permit’s title to “Metal” Coil Coating Facility instead of “Steel” Coil Coating Facility and,
  - in Section A, Number 12 to ‘applied to the “metal” ’ instead of ‘applied to the “steel.” ’

### **Permit R13-2379D**

The changes made to Permit R13-2379C to go to Permit R13-2379D are discussed under the engineering evaluation for R13-2379D.

# COMPARE FILE

## WordPerfect Document Compare Summary

Original document: Q:\AIR\_QUALITY\J\_LEGG\Jupiter Aluminum Corporation\R13-3265\009-00004\_PERM\_13-2379C.wpd

Revised document: Q:\AIR\_QUALITY\J\_LEGG\Jupiter Aluminum Corporation\R13-3265\009-00004\_PERM\_13-3265.wpd

Deletions are shown with the following attributes and color:

~~Strikeout~~, **Blue** RGB(0,0,255).

Deleted text is shown as full text.

Insertions are shown with the following attributes and color:

Double Underline, Redline, **Red** RGB(255,0,0).

The document was marked with 46 Deletions, 53 Insertions, 0 Moves.

Comparing R13-3265 to R13-2379C



west virginia department of environmental protection

Division of Air Quality  
601 57<sup>th</sup> 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

**PERMIT TO ~~MODIFY~~ ADMINISTRATIVELY UPDATE  
A ~~STEEL~~ METAL 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 R13-2379bC.

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

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

Permit No.: ~~R13-2379C~~ R13-3265

Plant ID No.: 009-00004

Effective Date of Permit: ~~March 15~~ August 25, 200~~15~~

Permit Writer: ~~Steven R. Pursley, PE~~ John Legg

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

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~~ Class I Administrative Update to split R13-2379C into two permits. R13-2379D includes only the operating sources that are associated with Coating Line #1. R13-3265 includes the remainder of the sources associated with Coating Line #2. Other changes were made and are described in the engineering evaluations to R13-2379D and R13-3265.

THE SOURCE IS SUBJECT TO 45CSR30. THE PERMITTED FACILITY'S TITLE V (45CSR30) PERMIT R30-00900004-2002, ISSUED ON 12/31/02, MUST BE REVISED BEFORE COMMENCING OPERATION OF THE ACTIVITY (ACTIVITIES) AUTHORIZED BY THIS PERMIT

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

<b>Pollutant</b>	<b>lbs/hr</b>	<b>tons/year</b>
Carbon Monoxide (CO)	1.93	7.65
Oxides of Nitrogen (NO <sub>x</sub> )	3.05	12.10
Sulfur Dioxide (SO <sub>2</sub> )	0.01	0.05
Particulate Matter(PM <sub>0</sub> )	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:

<b>Pollutant</b>	<b>lbs/hr</b>	<b>tons/year</b>
Carbon Monoxide (CO)	0.50	1.70
Oxides of Nitrogen (NO <sub>x</sub> )	0.60	2.38
Sulfur Dioxide (SO <sub>2</sub> )	0.01	0.03
Particulate Matter(PM <sub>0</sub> )	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:

<b>Identification</b>	<b>Description</b>
008-1	Chemical Dryer
008-3	Curing Oven
CO3	Thermal Oxidizer

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 (CO3). The tests shall be conducted in accordance with **OTHER REQUIREMENTS B.7 and B.8.**

#### COIL COATING LINE 1

~~6. Emissions from the RTO (emission point 3E) shall not exceed the following:~~  
~~R T O~~  
~~(3E)lb/hrtpyPM1.67.01CO4.0317.65NO<sub>x</sub>5.1622.6SO<sub>2</sub>0.0280.12VOG11.0248.27Methyl~~  
~~t s o b u t y l~~  
~~Ketone1.041.46Isophorone2.092.93Ethylbenzene1.381.94Formaldehyde0.260.37Hexa~~  
~~ne0.0020.008Cumene0.260.37Napthalene1.472.07Xylene4.636.51~~

~~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 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.~~

~~9. 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:~~

~~IdentificationDescription7SPrimer Oven8SFinishing Oven3CRTO~~

#### FACILITY WIDE REQUIREMENTS

10. 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:

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- 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		

11. The coater rooms shall be constructed in order to achieve 100 percent capture efficiency.
12. The permittee shall maintain records of the amount and type of coatings applied to the steel metal and VOC and HAP emissions for the coating lines.

## 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:

$$\text{Emissions (lb/hr)} = F \times \text{Incinerator Capacity (tons/hr)}$$

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

Table I: Factor, F, for Determining Maximum Allowable Particulate Emissions	
<i>Incinerator Capacity</i>	<i>F Factor</i>
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~~Secretary 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 U.S. EPA approved method approved by the ~~Director~~Secretary, in exhaust gases. Such tests shall be conducted in such manner as the ~~Director~~Secretary 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~~Secretary. The Secretary may, at the Secretary's option, witness or conduct such stack tests. Should the ~~Director~~Secretary exercise his or her 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~~Secretary may require, power for test equipment and the required safety equipment such as scaffolding, railings and ladders to comply with generally accepted good safety practices.

§45-6-7.2.

The ~~Director, or the Director's duly authorized representative,~~Secretary may conduct such other tests as the ~~Director~~Secretary 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.

**§45-7-5.2**

The owner or operator of a plant 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.

**§45-7-8.1**

At such reasonable times as the Director may designate the operator of any manufacturing process source operation may be required to conduct or have conducted stack tests to determine the particulate matter loading in exhaust gases when the Director has reason to believe that the stack emission limitations(s) is/are being violated. 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 his duly authorized representative, may at his 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 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.

§45-7-8.2

The Director, or his duly authorized representative, may conduct such other tests as he or she may deem necessary to evaluate air pollution emissions.

4. The pertinent sections of 45CSR13 applicable to this facility include, but are not limited to, the following:

§45-13-6.1

At the time a stationary source is alleged to be in compliance with an applicable emission standard and at reasonable times to be determined by the Secretary thereafter, appropriate tests consisting of visual determinations or conventional in-stack measurements or such other tests the Secretary may specify shall be conducted to determine compliance.

§45-13-10.2

The Secretary may suspend or revoke a permit or general permit registration if, after ~~six~~ (6) months from the date of issuance, the holder of the permit cannot provide the Secretary, at the Secretary's request, with written proof of a good faith effort that construction, modification, or relocation, if applicable, has commenced. Such proof shall be provided not later than thirty (30) days after the Secretary's request. If construction or modification of a stationary source is discontinued for a period of eighteen (18) months or longer, the Secretary may suspend or revoke the permit or general permit registration.

§45-13-10.3

The Secretary may suspend or revoke a permit or general permit registration if the plans and specifications upon which the approval was based or the conditions established in the permit are not adhered to. Upon notice of the Secretary's intent to suspend, modify or revoke a permit, the permit holder may request a conference with the Secretary in accordance with the provisions of W. Va. Code § 22-5-5 to show cause why the permit or general permit registration should not be suspended, modified or revoked.

5. The operations of the new affected facilities under this permit are subject to requirements of 40 CFR 60, Subpart TT. Pertinent sections applying to these operations include, but are not limited to:

**§60.7(a)**

Any owner or operator subject to the provisions of this part shall furnish written notification as follows :

**§60.7(a)(1)**

A notification of the date construction is commenced postmarked no later than 30 days after such date.

**§60.7(a)(2)**

A notification of the anticipated date of initial startup of an affected facility postmarked not more than 60 days not less than 30 days prior to such date.

**§60.7(a)(3)**

A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.

**§60.8(a)**

Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the Administrator under section 114 of the act, the owner or operator of such facility shall conduct performance test(s) and furnish a written report of the results of such performance test(s).

**§60.11(b)**

Compliance with opacity standards in this part shall be determined by conducting observations in accordance with Reference Method 9 in appendix A of 40 CFR 60. For purposes of determining initial compliance, the minimum total time of observations shall be 3 hours (30 6-minute averages) for the performance test or other set of observations (meaning those fugitive-type emission sources subject only to an opacity standard).

**§60.11(d)**

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.

**§60.460(a)**

The provisions of this subpart apply to the following affected facilities in a metal coil surface coating operation: each prime coat operation, each finish coat operation, and each prime and finish coat operation combined when the finish

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coat is applied wet on wet over the prime coat and both coatings are cured simultaneously.

**§60.460(b)**

This subpart applies to any facility identified in paragraph (a) of this section that commences construction, modification, or reconstruction after January 5, 1981.

**§60.462(a)**

On and after the date on which §60.8 requires a performance test to be completed, each owner or operator subject to this subpart shall not cause to be discharged into the atmosphere more than:

**§60.462(a)(1)**

0.28 kilogram VOC per liter (kg VOC/l) of coating solids applied for each calendar month for each affected facility that does not use an emission control device(s); or

**§60.462(a)(2)**

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

**§60.462(a)(3)**

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; or

**§60.462(a)(4)**

A value between 0.14 (or a 90-percent emission reduction) and 0.28 kg VOC/l of coating solids applied for each calendar month for each affected facility that intermittently uses an emission control device operated at the most recently demonstrated overall efficiency.

**§60.463(b)**

The owner or operator of an affected facility shall conduct an initial performance test as required under §60.8(a) and thereafter a performance test for each calendar month for each affected facility according to the procedures in this section.

**§60.464(c)**

If thermal incineration is used, each owner or operator subject to the provisions of this subpart shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases

incinerated to achieve compliance with §60.462(a)(2), (3), or (4). This device shall have an accuracy of  $\pm 2.5^{\circ}\text{C}$ . or  $\pm 0.75$  percent of the temperature being measured expressed in degrees Celsius, which is greater. Each owner or operator shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any thermal incinerator used to control emissions from an affected facility remains more than  $28^{\circ}\text{C}$  ( $50^{\circ}\text{F}$ ) below the temperature at which compliance with §60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by §60.8. The records required by §60.7 shall identify each such occurrence and its duration. If catalytic incineration is used, the owner or operator shall install, calibrate, operate, and maintain a device to monitor and record continuously the gas temperature both upstream and downstream of the incinerator catalyst bed. This device shall have an accuracy of  $\pm 2.5^{\circ}\text{C}$ . or  $\pm 0.75$  percent of the temperature being measured expressed in degrees Celsius, whichever is greater. During coating operations, the owner or operator shall record all periods in excess of 3 hours where the average difference between the temperature upstream and downstream of the incinerator catalyst bed remains below 80 percent of the temperature difference at which compliance was demonstrated during the most recent measurement of incinerator efficiency or when the inlet temperature falls more than  $28^{\circ}\text{C}$  ( $50^{\circ}\text{F}$ ) below the temperature at which compliance with §60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by §60.8. The records required by §60.7 shall identify each such occurrence and its duration.

**§60.465(b)**

Where compliance with §60.462(a)(2), (3), or (4) is achieved through the use of an emission control device that destroys VOC's, each owner or operator subject to the provisions of this subpart shall include the following data in the initial compliance report required by §60.8:

**§60.465(b)(1)**

The overall VOC destruction rate used to attain compliance with §60.462(a)(2), (3), or (4) and the calculated emission limit used to attain compliance with §60.462(a)(4); and

**§60.465(b)(2)**

The combustion temperature of the thermal incinerator or the gas temperature, both upstream and downstream of the incinerator catalyst bed, used to attain compliance with §60.462(a)(2), (3), or (4).

**§60.465(c)**

Following the initial performance test, the owner or operator of an affected 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 §60.462. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.

§60.465(d)

The owner or operator of each affected facility shall also submit reports at the frequency specified in §60.7(c) when the incinerator temperature drops as defined under §69.464(c). If no such periods occur, the owner or operator shall state this in the report.

§60.465(e)

Each owner or operator subject to the provisions of this subpart 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. If catalytic incineration is used, the owner or operator shall maintain at the source daily records of the gas temperature, both upstream and downstream of the incinerator catalyst bed.

6. All notifications and reports required pursuant to 40 CFR 60 under §60.7 shall be forwarded to:

Director  
WVDEP

Division of Air Quality  
601 57<sup>th</sup> St.  
Charleston, WV 25304

—and Associate Director, ~~Air Protection Division~~  
~~U.S. Environmental Protection~~  
~~Agency~~ Office of Air Enforcement and  
Region III Compliance Assistance  
1650 Arch Street (3AP20)  
25304-2345 U.S. Environmental  
Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

7. The facility is subject to requirements of 40 CFR 63, Subpart SSSS. Pertinent sections applying to these operations include, but are not limited to:

§63.5120(a)

Each coil coating affected source must limit organic HAP emissions to the level specified in paragraph (a)(1), (2), or (3) of this section:

§63.5120(a)(3)

If you use an oxidizer to control organic HAP emissions, operate the

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oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume on a dry basis is achieved and the efficiency of the capture system is 100 percent.

§63.5121(a)

Except as provided in paragraph (b) of this section, for any coil coating line for which you use an add-on control device, unless you use a solvent recovery system and conduct a liquid-liquid material balance according to §63.5170(e)(1), you must meet the applicable operating limits specified in Table 1 to this subpart. You must establish the operating limits during the performance test according to the requirements in §63.5160(d)(3). You must meet the operating limits at all times after you establish them.

§63.5130(a)

For an existing source, the compliance date is 3 years after June 10, 2002.

§63.5150(a)

To demonstrate continuing compliance with the standards, you must monitor and inspect each capture system and each control device required to comply with §63.5120 following the date on which the initial performance test of the capture system and control device is completed. You must install and operate the monitoring equipment as specified in paragraphs (a)(1) through (4) of this section.

§63.5150(a)(3)

*Temperature monitoring of oxidizers.* If you are complying with the requirements of the standards in §63.5120 through the use of an oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter, you must comply with paragraphs (a)(3)(i) through (iii) of this section.

§63.5150(a)(3)(i)

Install, calibrate, maintain, and operate temperature monitoring equipment according to manufacturers 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. You 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  $\pm 1$  percent of the temperature being monitored in degrees Celsius, or  $\pm 1^\circ$  Celsius, whichever is greater.

§63.5150(a)(3)(ii)

For an oxidizer other than a catalytic oxidizer, to demonstrate continuous compliance with the operating limit established according to §63.5160(d)(3)(i), you must install the thermocouple or temperature sensor in the combustion chamber at a location in the combustion zone.

**§63.5160(d)**

*Control device destruction or removal efficiency.* If you are using an add-on control device, such as an oxidizer, to comply with the standard in §63.5120, you must conduct a performance test to establish the destruction or removal efficiency of the control device or the outlet HAP concentration achieved by the oxidizer, according to the methods and procedures in paragraphs (d)(1) and (2) of this section. During the performance test, you must establish the operating limits required by §63.5121 according to paragraph (d)(3) of this section.

**§63.5160(d)(3)**

*Operating limits.* If you are using a capture system and add-on control device other than a solvent recovery system for which you conduct a liquid-liquid material balance to comply with the requirements in §63.5120, you must establish the applicable operating limits required by §63.5121. These operating limits apply to each capture system and to each add-on emission control device that is not monitored by CEMS, and you must establish operating limits during the performance test required by paragraph (d) of this section according to the requirements in paragraphs (d)(3)(i) through (iii) of this section.

**§63.5160(d)(3)(i)**

*Thermal Oxidizer.* If your add-on control device is a thermal oxidizer, establish the operating limits according to paragraphs (d)(3)(i)(A) and (B) of this section.

**§63.5160(d)(3)(i)(A)**

During the performance test, you must monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. You must monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.

**§63.5160(d)(3)(i)(B)**

Use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for you thermal

oxidizer.

§63.5170(c)

*Capture and control to reduce emissions to no more than the allowable limit.* If you use one or more capture systems and one or more control devices and demonstrate an average overall organic HAP control efficiency of at least 98 percent for each month to comply with §63.5120(a)(1); or operate a capture system and oxidizer so that the capture efficiency is 100 percent and the oxidizer outlet HAP concentration is no greater than 20 ppm<sub>v</sub> on a dry basis to comply with §63.5120(a)(3), you must follow one of the procedures in paragraphs (c)(1) through (4) of this section. Alternatively, you may demonstrate compliance for an individual coil coating line by operating its capture system and control device and continuous parameter monitoring system according to the procedures in paragraph (i) of this section.

8. Tests that are required by the Director to determine compliance with the destruction efficiency as set forth in SPECIFIC REQUIREMENTS A.1 ~~and A.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.
  - a. 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.
9. 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) and the operational constraint(s) placed on the system that shall not allow operation 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 of the stack testing date.

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10. For the purposes of determining compliance with the limits set forth in SPECIFIC REQUIREMENTS A.2, ~~A.3, A6~~ and A.113, 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 P17, ~~P16~~ and 3EP16. 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.

11. For the purposes of determining compliance with the maximum fuel usage limits set forth in SPECIFIC REQUIREMENTS A.4 ~~and A.9~~ 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.

## C. GENERAL REQUIREMENTS

1. In accordance with 45CSR30 - "Operating Permit Program", the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first filing a Certified Emissions Statement (CES) and paying the appropriate fee. Such Certified Emissions Statement (CES) shall be filed and the appropriate fee paid annually. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.
2. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.
3. The permitted facility shall be constructed and operated in accordance with

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information filed in Permit Applications R13-2379, R13-2379A, R13-2379B and R13-2379C and any amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to.

4. At such reasonable time(s) as the Secretary may designate, the permittee shall conduct or have conducted test(s) to determine compliance with the emission limitations established in the permit application and/or applicable regulations. Test(s) shall be conducted in such a manner as the Secretary may specify or approve and shall be filed in a manner acceptable to the Secretary. The Secretary, or his/her duly authorized representative, may at his option witness or conduct such test. Should the Secretary exercise his option to conduct such test(s), the permittee shall provide all the necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment, and the required safety equipment such as scaffolding, railings, and ladders to comply with generally accepted good safety practices. For any tests to be conducted by the permittee, a test protocol shall be submitted to the DAQ by the permittee at least thirty (30) days prior to the test and shall be approved by the Secretary. The Secretary shall be notified at least fifteen (15) days in advance of the actual dates and times during which the test will be conducted.
5. In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations, either in whole or in part, authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.
6. The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.
7. The permittee shall notify the Secretary, in writing, within fifteen (15) calendar days of the commencement of the construction, modification, or relocation activities authorized under this permit.
8. The permittee shall notify the Secretary, in writing, at least fifteen (15) calendar days prior to actual startup of the operations authorized under this permit.
9. This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13.
10. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia

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Code 22-5-6 and 22-5-7.

11. At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous calendar year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a submittal frequency other than on an annual basis.

ISSUED BY: \_\_\_\_\_

JOHN A. BENEDICT

ISSUED BY: \_\_\_\_\_

WILLIAM F. DURHAM, DIRECTOR  
WV DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DIVISION OF AIR QUALITY

DATE SIGNED: \_\_\_\_\_

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