June 8, 2007

Via Certified Mail - Return Receipt Requested

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

RE: Wheeling Corrugating Company - Title V Operating Permit Renewal Application

Dear Mr. Benedict:

Wheeling Corrugating Company is submitting this Title V renewal application in accordance with WV Rule 30 (45CSR30).

Two copies of this application package are being submitted as per the instructions to complete a Title V renewal application. Please feel free to contact Harold Strohmeyer (740) 283-5148 if you have any questions regarding this submittal.

Sincerely,

Harold G. Strohmeyer
Environmental Engineer

enclosures: Title V Operating Permit Renewal Application

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GENERAL APPLICATION FORMS

WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF AIR QUALITY
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0475
www.wvdep.org/daq

TITLE V PERMIT APPLICATION - GENERAL FORMS

Section 1: General Information

1. **Name of Applicant (As registered with the WV Secretary of State's Office):** Wheeling Corrugating Company	2. **Facility Name or Location:** Beech Bottom Plant
3. **DAQ Plant ID No.:** 009 —00004	4. **Federal Employer ID No. (FEIN):** 004319588

5. **Permit Application Type:**

☐ Initial Permit — When did operations commence? 01/01/1960
☒ Permit Renewal — What is the expiration date of the existing permit? 12/31/2007
☐ Update to Initial Permit Application

6. Type of Business Entity:

☒ Corporation ☐ Governmental Agency
☐ Partnership ☐ Limited Partnership

7. Is the Applicant the:

☐ Owner ☐ Operator ☒ Both

If the Applicant is not both the owner and operator, please provide the name and address of the other party.

_____
_____
_____

8. Number of onsite employees:

103

9. Governmental Code:

☒ Privately owned and operated; 0
☐ Federally owned and operated; 1
☐ State government owned and operated; 2
☐ County government owned and operated; 3
☐ Municipality government owned and operated; 4
☐ District government owned and operated; 5

10. 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.

11. Mailing Address		
Street or P.O. Box: 1134 Market Street		
City: Wheeling	**State:** WV	**Zip: 26003**
Telephone Number: (304) 234-2662	**Fax Number:** (304) 234-2613	

12. Facility Location		
Street: West Virginia State Route 2	**City:** Beech Bottom	**County:** Brooke
UTM Easting: 528.81 km	**UTM Northing:** 4452.42 km	**Zone:** ☒ 17 or ☐ 18
Directions: Facility is located on the west side of West Virginia State Route 2, immediately south of the village of Beech Bottom.		
Portable Source? ☐ Yes ☒ No		
Is facility located within a nonattainment area? ☒ Yes ☐ No		**If yes, for what air pollutants?** Ozone PM2.5
Is facility located within 50 miles of another state? ☒ Yes ☐ No		**If yes, name the affected state(s).** Ohio Pennsylvania
Is facility located within 100 km of a Class I Area[1]? ☐ Yes ☒ No **If no, do emissions impact a Class I Area[1]?** ☐ Yes ☒ No		**If yes, name the area(s).**

[1] *Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Face Wilderness Area in Virginia.*

13. Contact Information		
Responsible Official: Mark Morelli		**Title:** Vice President of Operations
Street or P.O. Box: West Virginia State Route 2		
City: Village of Beech Bottom	**State:** WV	**Zip: 26030**
Telephone Number: (304) 234-2549	**Fax Number:** (304) 234-2210	
E-mail address: morellimp@wpsc.com		
Environmental Contact: Bud E. Smith		**Title:** Director of Environmental Control
Street or P.O. Box: 1134 Market Street		
City: Wheeling	**State:** WV	**Zip: 26003**
Telephone Number: (304) 234-2662	**Fax Number:** (304) 234-2613	
E-mail address: smithbe@wpsc.com		
Application Preparer: Patrick J. Kirkham		**Title:** Project Manager
Company: Environmental Quality Management, Inc.		
Street or P.O. Box: 500 Market Street, Suite 302		
City: Bridgewater	**State:** PA	**Zip:** 15009
Telephone Number: (724) 775-2910	**Fax Number:** (724) 775-2912	
E-mail address: pkirkham@eqm.com		

14. Facility Description

List all processes, products, NAICS and SIC codes for normal operation, in order of priority. Also list any process, products, NAICS and SIC codes associated with any alternative operating scenarios if different from those listed for normal operation.

Process	Products	NAICS	SIC
Metal Coating	Coated Steel Coils	332812	3479

Provide a general description of operations.

Coil coating is performed on two coating lines, Coating Line #1, and Coating Line #2. Coating line #1 includes a surface cleaning section, drying oven, primer coater, primer curing oven, primer quench tank, finish coater, finish curing oven, and finish quench tank. Coating line #2 includes a seven-stage surface treatment, drying oven, coater, curing oven, and quench tank. Both coating lines are controlled by a designated regenerative thermal oxidizer (two total) that comply with the appropriate MACT standard. The facility is also subject to and complies with 40 CFR Part 60, Subpart TT for coil coating.

The facility also operates four natural gas fired boilers to provide process steam.

15. Provide an **Area Map** showing plant location as **ATTACHMENT A.**

16. Provide a **Plot Plan(s)**, e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is located as **ATTACHMENT B.** For instructions, refer to "Plot Plan - Guidelines."

17. Provide a detailed **Process Flow Diagram(s)** showing each process or emissions unit as **ATTACHMENT C.** Process Flow Diagrams should show all emission units, control equipment, emission points, and their relationships.

Section 2: Applicable Requirements

18. Applicable Requirements Summary	
Instructions: Mark all applicable requirements.	
☐ SIP	☐ FIP
☐ Minor source NSR (45CSR13)	☐ PSD (45CSR14)
☐ NESHAP (45CSR15)	☐ Nonattainment NSR (45CSR19)
☒ Section 111 NSPS	☒ Section 112(d) MACT standards
☐ Section 112(g) Case-by-case MACT	☐ 112(r) RMP
☐ Section 112(i) Early reduction of HAP	☐ Consumer/commercial prod. reqts., section 183(e)
☐ Section 129 Standards/Reqts.	☐ Stratospheric ozone (Title VI)
☐ Tank vessel reqt., section 183(f)	☐ Emissions cap 45CSR§30-2.6.1
☐ NAAQS, increments or visibility (temp. sources)	☐ 45CSR27 State enforceable only rule
☐ 45CSR4 State enforceable only rule	☐ Acid Rain (Title IV, 45CSR33)
☐ Emissions Trading and Banking (45CSR28)	☐ Compliance Assurance Monitoring (40CFR64)
☐ NO_x Budget Trading Program Non-EGUs (45CSR1)	☐ NO_x Budget Trading Program EGUs (45CSR26)

19. Non Applicability Determinations
List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies. 40 CFR63.5150(1): Not an "Intermittently Controlled Work Station" 40 CFR64 – CAM does not apply since units are subject to MACT Standard (Subpart SSSS) and NSPS 63.5160(3)(iii): Not using an "Other type of control device" 63.5170(a) & (b): Not relying on "As-purchased compliant coatings: or "As-applied compliant coatings for compliance 63.5170(c)(1), (d)(1)&(3), (e), (g): Not using a solvent recovery device for compliance Table 1 to Subpart SSSS, item 2: Not using a catalytic oxidizer for compliance Also, see Table 2 to Subpart SSSS – Applicability of General Provisions to Subpart SSSS
☒ Permit Shield
19. Non Applicability Determinations *(Continued)* - *Attach additional pages as necessary.*

List all requirements which the source has determined not applicable and for which a permit shield is requested. The listing shall also include the rule citation and the reason why the shield applies.

1. 45 CSR 17 – The Wheeling Corrugating Company – Beech Bottom is exempt from this rule because 45 CSR parts 2, 3, 5, and 7 apply.

2. 45 CSR 21 – This regulation is not applicable to the sources at the Wheeling Corrugating Company – Beech Bottom since it is not located in any of the affected counties.

3. 45 CSR 27 – This regulation does not apply to the Wheeling Corrugating Company – Beech Bottom since the facility is not considered a technical processing unit and does not emit any of the toxic air pollutants listed at or above the specified levels.

4. 45 CSR 29 – This regulation is not applicable to the Wheeling Corrugating Company – Beech Bottom since the facility is not located in any of the affected areas specified in the regulation.

5. 40 CFR Part 68 Risk Management Plan – This regulation is not applicable to the sources at the Wheeling Corrugating Company – Beech Bottom because none of the storage thresholds are triggered.

☒ Permit Shield

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the rule citation and/or permit with the condition number.

45 CSR§6-3.1(3.1.c and 3.1.d. State Enforceable only) Open Burning – Title V Permit Condition 3.1.1.

45 CSR§6-3.2 Open Burning Exemptions – Title V Permit Condition 3.1.2.

40 CFR Part 61 Asbestos – Title V Permit Condition 3.1.3.

45 CSR§4-3.1 (State Enforceable Only) Odor – Title V Permit Condition 3.1.4.

45 CSR§13-10.5 Permanent Shutdown – Title V Permit Condition 3.1.5.

45 CSR§11-5.2 Standby Plan for Reducing Emissions – Title V Permit Condition 3.1.6.

WV Code § 22-5-4(a)(14) Emission Inventory – Title V Permit Condition 3.1.7.

40 CFR Part 82, Subpart F Ozone Depleting Substances – Title V Permit Condition 3.1.8.

Permit No. R13-2379B Condition A.10 Formaldehyde Emission Rate – Title V Permit Condition 3.1.10.

Permit No. R13-2379B Condition C.3 Operate in Accordance with Permit – Title V Permit Condition 3.1.11.

WV Code § 22-5-4(a)(15) and 45 CSR13- Stack Testing – Title V Permit Condition 3.3.1.

45 CSR§30-5.1.c.2.A – Monitoring Information – Title V Permit Condition 3.4.1.

45 CSR§30-5.1.c.2.B Retention of Records – Title V Permit Condition 3.4.2.

45 CSR§30-5.1.c. (State Enforceable Only) Odor – Title V Permit Condition 3.4.3.

Permit #R13-2379A Condition A.10.b. TAP Restrictions – Title V Permit Condition 3.4.4.

Permit #R13-2379A Condition A.10.c. TAP Restrictions – Title V Permit Condition 3.4.5.

45 CSR§30-4.4 and 5.1.c.3D. Responsible Official – Title V Permit Condition 3.5.1.

45 CSR§30-5.1.c.3E. Confidentiality – Title V Permit Condition 3.5.2.

45 CSR§30-8. Certified Emissions Statement – Title V Permit Condition 3.5.4.

45 CSR§30-5.3.e. Compliance Certification – Title V Permit Condition 3.5.5.

45 CSR§30-5.1.c.3.A. Semi-Annual Monitoring Reports – Title V Permit Condition 3.5.6.

45 CSR§30-5.7.a through e. Emergencies– Title V Permit Condition 3.5.7.

45 CSR§30-5.1.c.3B through D. Deviations – Title V Permit Condition 3.5.8.

45 CSR§30-4.3.h.1.B. New Applicable Requirements – Title V Permit Condition 3.5.9.

Permit #R13-2379B Condition A.10.a. Reporting of Surface Coatings – Title V Permit Condition 3.5.10.

Permit #R13-2379B Condition A.9. and Permit #R13-2379C Condition A.10. – HAP Recordkeeping and Recording – To be added to new Title V Permit

Permit #R13-2379B Condition A.4. and Permit #R13-2379C Condition A.11. – Capture Efficiency – To be added to new Title V Permit

Permit #R13-2379C Condition A.12. - Coating Records – To be added to new Title V Permit

☒ Permit Shield

For all facility-wide applicable requirements listed above, provide monitoring/testing / recordkeeping / reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number and/or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45 CSR§6-3.1(3.1.c and 3.1.d. State Enforceable only) Open Burning – Title V Permit Condition 3.1.1. – There are no applicable monitoring/testing/recordkeeping/or reporting required. *This applies to all applicable requirements below unless otherwise noted.*

45 CSR§6-3.2 Open Burning Exemptions – Title V Permit Condition 3.1.2. – *see above.*

40 CFR Part 61 Asbestos – Title V Permit Condition 3.1.3. – Testing, reporting and recordkeeping performed when applicable.

45 CSR§4-3.1 (State Enforceable Only) Odor – Title V Permit Condition 3.1.4. – *see above.*

45 CSR§13-10.5 Permanent Shutdown – Title V Permit Condition 3.1.5. – *see above.*

45 CSR§11-5.2 Standby Plan for Reducing Emissions – Title V Permit Condition 3.1.6. – A plan will be prepared if requested.

WV Code § 22-5-4(a)(14) Emission Inventory – Title V Permit Condition 3.1.7. – Emission inventory submitted each year, as required.

40 CFR Part 82, Subpart F Ozone Depleting Substances – Title V Permit Condition 3.1.8. – Testing, reporting and recordkeeping performed when applicable.

Permit No. R13-2379B Condition A.10 Formaldehyde Emission Rate – Title V Permit Condition 3.1.10. – 12-month rolling total maintained at the facility.

Permit No. R13-2379B Condition C.3 Operate in Accordance with Permit – Title V Permit Condition 3.1.11. – The facility has been constructed in accordance with the specified permits.

WV Code § 22-5-4(a)(15) and 45 CSR13- Stack Testing – Title V Permit Condition 3.3.1. - Testing, reporting and recordkeeping performed when applicable, as required.

45 CSR§30-5.1.c.2.A – Monitoring Information – Title V Permit Condition 3.4.1. - Testing, reporting and recordkeeping performed when applicable, as required.

45 CSR§30-5.1.c.2.B Retention of Records – Title V Permit Condition 3.4.2. - Recordkeeping performed when applicable as required.

45 CSR§30-5.1.c. (State Enforceable Only) Odor – Title V Permit Condition 3.4.3. - Testing, reporting and recordkeeping performed when applicable.

Permit #R13-2379A Condition A.10.b. TAP Restrictions – Title V Permit Condition 3.4.4. - Testing, reporting and recordkeeping performed when applicable, as required.

Permit #R13-2379A Condition A.10.c. TAP Restrictions – Title V Permit Condition 3.4.5. - Testing, reporting and recordkeeping performed when applicable, as required.

45 CSR§30-4.4 and 5.1.c.3D. Responsible Official – Title V Permit Condition 3.5.1. - Testing, reporting and recordkeeping performed when applicable, as required.

45 CSR§30-5.1.c.3E. Confidentiality – Title V Permit Condition 3.5.2. – *see above.*

45 CSR§30-8. Certified Emissions Statement – Title V Permit Condition 3.5.4. - Testing, reporting and recordkeeping performed when applicable, as required.

45 CSR§30-5.3.e. Compliance Certification – Title V Permit Condition 3.5.5. - Testing, reporting and recordkeeping performed when applicable, as required.

45 CSR§30-5.1.c.3.A. Semi-Annual Monitoring Reports – Title V Permit Condition 3.5.6. - Testing, reporting and recordkeeping performed when applicable, as required.

45 CSR§30-5.7.a through e. Emergencies– Title V Permit Condition 3.5.7. Testing, reporting and recordkeeping performed when applicable, as required.

See Additional Applicable Requirements on next page that would not fit in this text box.

Are you in compliance with all facility-wide applicable requirements? ☒ Yes ☐ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F.**

45 CSR§30-5.1.c.3B through D. Deviations – Title V Permit Condition 3.5.8. - Testing, reporting and recordkeeping performed when applicable, as required.

45 CSR§30-4.3.h.1.B. New Applicable Requirements – Title V Permit Condition 3.5.9. - Testing, reporting and recordkeeping performed when applicable, as required.

Permit #R13-2379B Condition A.10.a. Reporting of Surface Coatings – Title V Permit Condition 3.5.10. - Testing, reporting and recordkeeping performed when applicable, as required.

Permit #R13-2379B Condition A.9. and Permit #R13-2379C Condition A.10. – HAP Recordkeeping and Recording – To be added to new Title V Permit - Reporting and recordkeeping performed when applicable, as required.

Permit #R13-2379B Condition A.4. and Permit #R13-2379C Condition A.11. – Capture Efficiency – To be added to new Title V Permit - Compliance demonstrated through the appropriate monitoring and recordkeeping.

Permit #R13-2379C Condition A.12. - Coating Records – To be added to new Title V Permit - Recordkeeping performed when applicable, as required.

21. Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance MM/DD/YYYY	List any Permit Determinations that Affect the Permit *(if any)*
R30-00900004	12/31/2002	
R-13 2379B	4/01/2003	
R-13 2379C	3/15/2005	

22. Inactive Permits/Obsolete Permit Conditions		
Permit Number	Date of Issuance	Permit Condition Number
R-13-2379	4/26/2000	
R-13 2379A	11/28/2001	
	/ /	

Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	42.5
Nitrogen Oxides (NO_X)	98.9
Lead (Pb)	0.003
Particulate Matter (PM_{10})[1]	16.4
Total Particulate Matter (TSP)	17.1
Sulfur Dioxide (SO_2)	0.5
Volatile Organic Compounds (VOC)	62.6
Hazardous Air Pollutants[2]	Potential Emissions
Formaldehyde	0.47
Hexane Isomers	0.018
Isophorone	2.9
Ethylbenzene	1.9
MIBK	1.5
Cumene	0.37
Napthalene	2.1
HAPS from CCL#2	4.13
Regulated Pollutants other than Criteria and HAP	Potential Emissions

[1] PM_{10} is a component of TSP.
[2] For HAPs that are also considered PM or VOCs, emissions should be included in both the HAPs section and the Criteria Pollutants section.

Section 4: Insignificant Activities

24. Insignificant Activities (Check all that apply)		
☒	1.	Air compressors and pneumatically operated equipment, including hand tools.
☒	2.	Air contaminant detectors or recorders, combustion controllers or shutoffs.
☒	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.
☒	4.	Bathroom/toilet vent emissions.
☒	5.	Batteries and battery charging stations, except at battery manufacturing plants.
☒	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.
☐	7.	Blacksmith forges.
☒	8.	Boiler water treatment operations, not including cooling towers.
☒	9.	Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
☐	10.	CO_2 lasers, used only on metals and other materials which do not emit HAP in the process.
☒	11.	Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
☒	12.	Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
☒	13.	Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
☒	14.	Demineralized water tanks and demineralizer vents.
☒	15.	Drop hammers or hydraulic presses for forging or metalworking.
☐	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.
☐	17.	Emergency (backup) electrical generators at residential locations.
☒	18.	Emergency road flares.
☒	19.	Emission units which do not have any applicable requirements and which emit criteria pollutants (CO, NO_x, SO_2, 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. Please specify all emission units for which this exemption applies along with the quantity of criteria pollutants emitted on an hourly and annual basis: Wastewater Treatment Plant: 0.02 lbs VOC/hr; 0.088 tpy VOCs _____ _____ _____ _____ _____ _____ _____

24. Insignificant Activities (Check all that apply)		
☐	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. 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: _____ _____ _____ _____ _____
☐	21.	Environmental chambers not using hazardous air pollutant (HAP) gases.
☒	22.	Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
☐	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.
☒	24.	Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
☐	25.	Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
☒	26.	Fire suppression systems.
☒	27.	Firefighting equipment and the equipment used to train firefighters.
☒	28.	Flares used solely to indicate danger to the public.
☐	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.
☐	30.	Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
☒	31.	Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
☐	32.	Humidity chambers.
☐	33.	Hydraulic and hydrostatic testing equipment.
☒	34.	Indoor or outdoor kerosene heaters.
☒	35.	Internal combustion engines used for landscaping purposes.
☐	36.	Laser trimmers using dust collection to prevent fugitive emissions.
☐	37.	Laundry activities, except for dry-cleaning and steam boilers.
☒	38.	Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
☒	39.	Oxygen scavenging (de-aeration) of water.
☐	40.	Ozone generators.
☒	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

24. Insignificant Activities (Check all that apply)		
		owners/operators must still get a permit if otherwise requested.)
☒	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.
☒	43.	Process water filtration systems and demineralizers.
☒	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.
☒	45.	Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
☒	46.	Routing calibration and maintenance of laboratory equipment or other analytical instruments.
☐	47.	Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
☐	48.	Shock chambers.
☐	49.	Solar simulators.
☒	50.	Space heaters operating by direct heat transfer.
☐	51.	Steam cleaning operations.
☒	52.	Steam leaks.
☐	53.	Steam sterilizers.
☒	54.	Steam vents and safety relief valves.
☒	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.
☒	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.
☐	57.	Such other sources or activities as the Director may determine.
☐	58.	Tobacco smoking rooms and areas.
☐	59.	Vents from continuous emissions monitors and other analyzers.

Section 5: Emission Units, Control Devices, and Emission Points

25. Equipment Table
Fill out the **Title V Equipment Table** and provide it as **ATTACHMENT D.**
26. Emission Units
For each emission unit listed in the **Title V Equipment Table**, fill out and provide an **Emission Unit Form** as **ATTACHMENT E.**
For each emission unit not in compliance with an applicable requirement, fill out a **Schedule of Compliance Form** as **ATTACHMENT F.**
27. Control Devices
For each control device listed in the **Title V Equipment Table**, fill out and provide an **Air Pollution Control Device Form** as **ATTACHMENT G.**
For any control device that is required on an emission unit in order to meet a standard or limitation for which the potential pre-control device emissions of an applicable regulated air pollutant is greater than or equal to the Title V Major Source Threshold Level, refer to the **Compliance Assurance Monitoring (CAM) Form(s)** for CAM applicability. Fill out and provide these forms, if applicable, for each Pollutant Specific Emission Unit (PSEU) as **ATTACHMENT H.**

Section 6: Certification of Information

28. Certification of Truth, Accuracy and Completeness and Certification of Compliance

*Note: This Certification must be signed by a responsible official. The **original**, signed in **blue ink**, must be submitted with the application. Applications without an **original** signed certification will be considered as incomplete.*

a. Certification of Truth, Accuracy and Completeness

I certify that I am a responsible official (as defined at 45CSR§30-2.38) and am accordingly authorized to make this submission on behalf of the owners or operators of the source described in this document and its attachments. I certify under penalty of law that I have personally examined and am familiar with the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine and/or imprisonment.

b. 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.

Responsible official (type or print)

Name: Mark Morelli	Title: VP of Operations

Responsible official's signature:

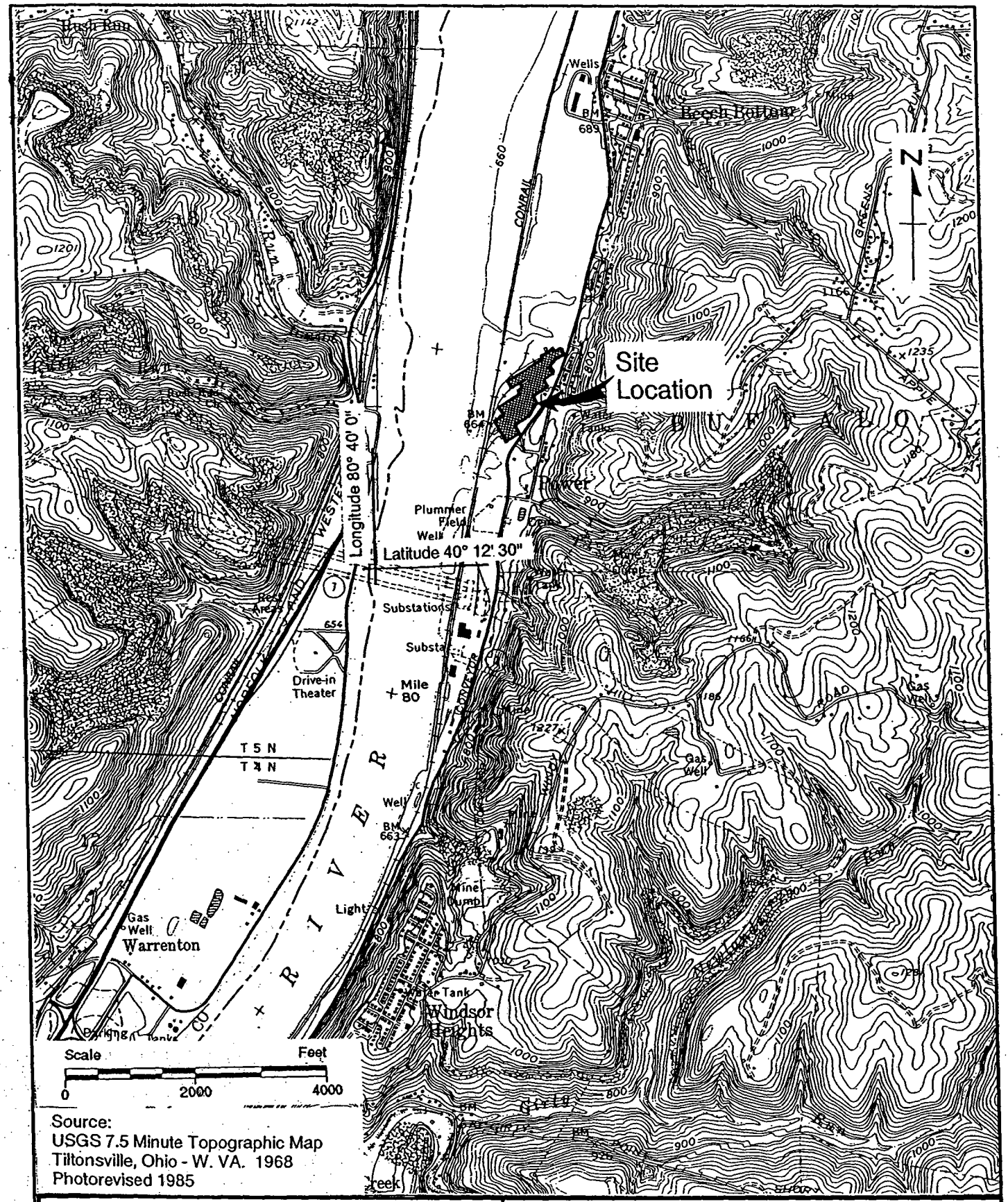
Signature: _____ Signature Date: _____

(Must be signed and dated in blue ink)

Note: Please check all applicable attachments included with this permit application:	
☒	ATTACHMENT A: Area Map
☒	ATTACHMENT B: Plot Plan(s)
☒	ATTACHMENT C: Process Flow Diagram(s)
☒	ATTACHMENT D: Equipment Table
☒	ATTACHMENT E: Emission Unit Form(s)
☐	ATTACHMENT F: Schedule of Compliance Form(s)
☒	ATTACHMENT G: Air Pollution Control Device Form(s)
☒	ATTACHMENT H: Compliance Assurance Monitoring (CAM) Form(s)

All of the required forms and additional information can be found and downloaded from, the DEP website at www.wvdep.org/daq, requested by phone (304) 926-0475, and/or obtained through the mail.

Title V Renewal Application Attachment A – Area Map Project # 050050484.0001	Wheeling Corrugating Company Beech Bottom Plant DAQ Plant ID: 009-00004



Title V Renewal Application

Attachment A – Area Map

Project # 050050484.0001

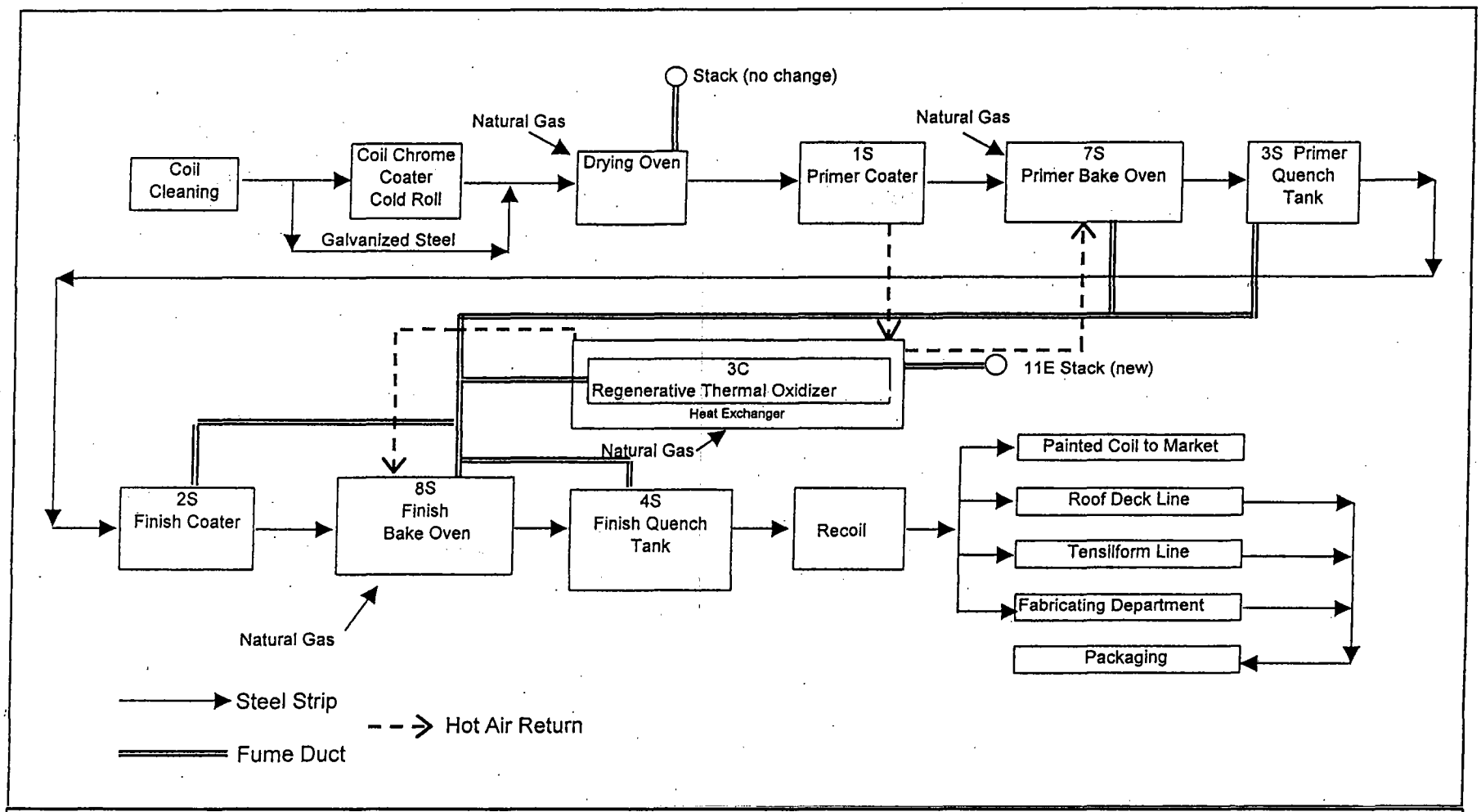
Wheeling Corrugating Company

Beech Bottom Plant

DAQ Plant ID: 009-00004

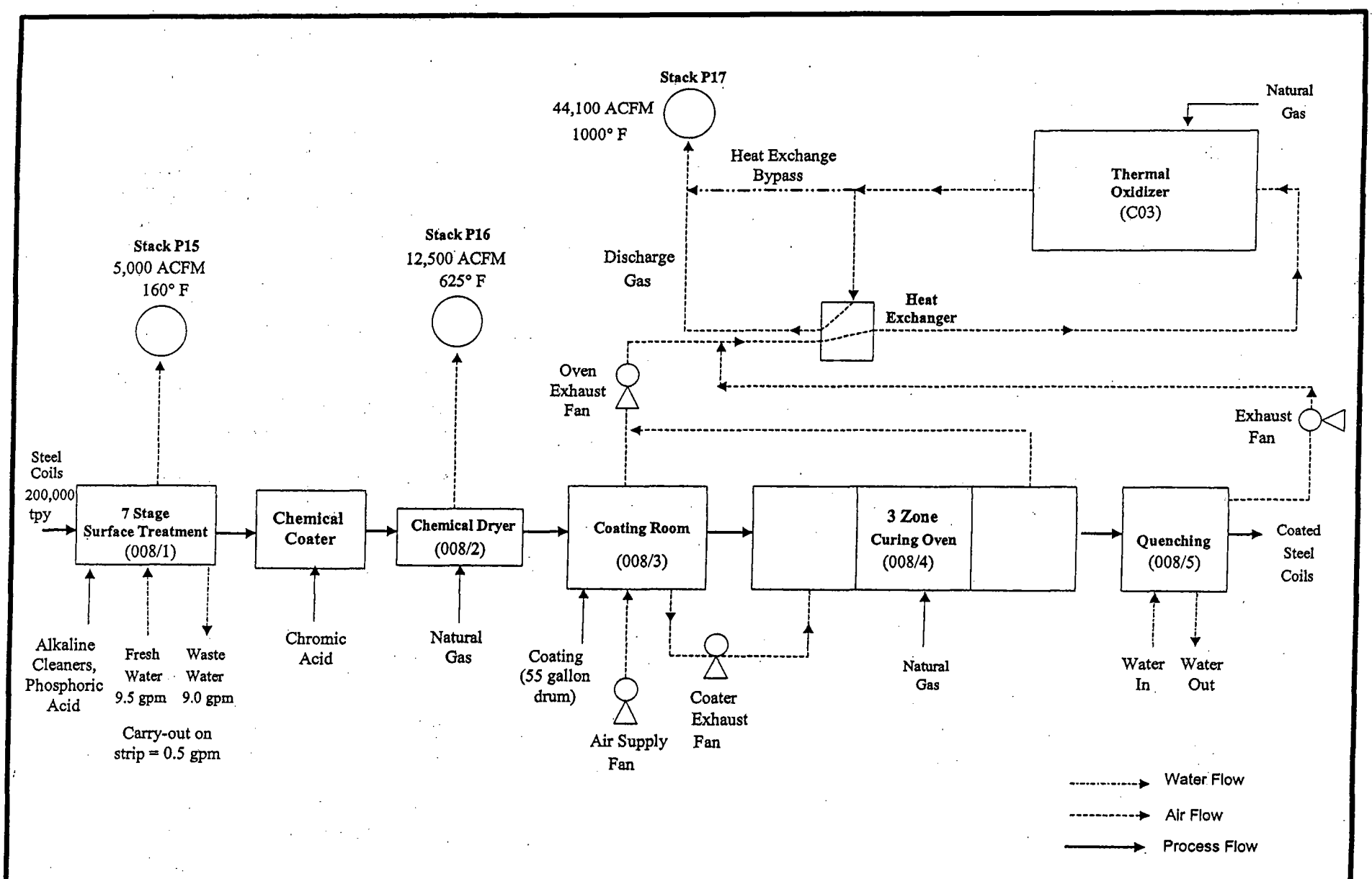
Title V Renewal Application Attachment B – Plot Plan Project # 050050484.0001	Wheeling Corrugating Company Beech Bottom Plant DAQ Plant ID: 009-00004

Title V Renewal Application Attachment C – Process Flow Diagrams Project # 050050484.0001	Wheeling Corrugating Company Beech Bottom Plant DAQ Plant ID: 009-00004



Title V Renewal Application
Attachment C – Process Flow Diagram Coil Coating Line #1
Project # 050050484.0001

Wheeling Corrugating Company
Beech Bottom Plant
DAQ Plant ID: 009-00004



Title V Renewal Application
Attachment C – Process Flow Diagram Coil Coating Line #2
Project # 050050484.0001

Wheeling Corrugating Company
Beech Bottom Plant
DAQ Plant ID: 009-00004

Title V Renewal Application Attachment D – Equipment Table Project # 050050484.0001	Wheeling Corrugating Company Beech Bottom Plant DAQ Plant ID: 009-00004

ATTACHMENT D - Title V Equipment Table

(includes all emission units at the facility except those designated as insignificant activities in Section 4, Item 24 of the General Forms)

Emission Point ID[1]	Control Device[1]	Emission Unit ID[1]	Emission Unit Description	Design Capacity	Year Installed/ Modified
Boiler #1	None	003-01	Cleaver Brooks natural gas fired boiler	25.2 MMBtu/Hr	1960
Boiler #2	None	003-02	Cleaver Brooks natural gas fired boiler	25.2 MMBtu/Hr	1960
Boiler #3	None	003-03	Cleaver Brooks natural gas fired boiler	25.2 MMBtu/Hr	1960
Boiler #4	None	003-04	Cleaver Brooks natural gas fired boiler	25.2 MMBtu/Hr	1960
Surface Cleaning Section	None	001-01	Three hot rinse tanks, cold rinse tank, phosphoric acid rinse tank, zinc phosphatizing tank, cleaner, brush machine, and pre-clean tanks.	----	1960
Drying Oven	None	001-02	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.	4 MMBtu/Hr	1960
11E	3C	1S	CCL#1 Primer coating application room	12 Gallons/Hr	2005
11E	3C	2S	CCL #1 Finish coating application room	58 Gallons/Hr	2005
11E	3C	3S	CCL #1 Primer Quench	16,200 Gallons/Hr	2005
11E	3C	4S	CCL #1 Finish Quench	16,200 Gallons/Hr	2005
11E	3C	7S	CCL #1 Primer Curing Oven	(3) 5 MMBtu/Hr	2005
11E	3C	8S	CCL #1 Finish Curing Oven	(3) 5 MMBtu/Hr	2005
11E	3C	NA	CCL #1 Regenerative Thermal Oxidizer	(2) 9 MMBtu/Hr	2005
Surface Treatment	None	008/1	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

Drying Oven	None	008/2	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.	6 MMBtu/Hr	2002
Coater	CO3	008/3	Top and bottom roll coater to apply coating to steel strip.	38 Gallons/Hr	2002
Curing Oven	CO3	008/4	Natural gas fired oven to cure coating onto steel strip.	12 MMBtu/Hr	2002
Quench Tank	CO3	008/5	Water sprays applied to cool steel strip exiting the curing oven.	----	2002
Roads and Parking Areas	None	006-01	Facility paved roads and parking lots.	----	1960
Roll Forming	None	006-03	Roll forming	----	c. 1960

[1]For 45CSR13 permitted sources, the numbering system used for the emission points, control devices, and emission units should be consistent with the numbering system used in the 45CSR13 permit. For grandfathered sources, the numbering system should be consistent with registrations or emissions inventory previously submitted to DAQ. For emission points, control devices, and emissions units which have not been previously labeled, use the following 45CSR13 numbering system: 1S, 2S, 3S,... or other appropriate description for emission units; 1C, 2C, 3C,... or other appropriate designation for control devices; 1E, 2E, 3E, ... or other appropriate designation for emission points.

Title V Renewal Application Attachment E – Emissions Unit Forms Project # 050050484.0001	Wheeling Corrugating Company Beech Bottom Plant DAQ Plant ID: 009-00004

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
003-01, 003-02, 003-03, 003-04	Boiler #1, Boiler #2, Boiler #3, and Boiler #4	None

Provide a description of the emission unit (type, method of operation, design parameters, etc.

Four 25.2 MMBtu/hour Cleaver Brooks natural gas fired boilers used primarily to provide steam to heat various coating line cleaning tanks. Normal operations include two boilers functioning during the winter months, and one boiler during other months.

Manufacturer:	**Model number:**	**Serial number:**
Cleaver Brooks	CB 251X-500	NA
Construction date:	**Installation date:**	**Modification date(s):**
1/1/1960	1/1/1960	NA

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
25.2 MMBtu/Hr Each and 100.8 MMBtu/Hr Total

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
25.2 Mcf/Hr Each and 100.8Mcf/Hr Total	220,752 Mcf/Year Each and 883,008 Mcf/Year Total	8,760 Hours Each and 35,040 Hours Total

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? _X_Yes ___ No	**If yes, is it?** _X_ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: 25.2 MMBtu/Hr Each and 100.8 MMBtu/Hr Total	**Type and Btu/hr rating of burners:** 25.2 MMBtu/Hr Each and 100.8MMBtu/Hr Total

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.

Primary Fuel Hourly = Natural Gas 25.2 Mcf/Hr Each and 100.8 Mcf/Hr Total
Primary Fuel Annual = 220,752 Mcf/Year Each and 883,008 Mcf/Year Total

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	negligible	negligible	1,000Btu/SCF

Emissions Data – **Total for all 4 Boilers**		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	3.53	15.5
Nitrogen Oxides (NO_X)	14.1	61.8
Lead (Pb)	0.00068	0.003
Particulate Matter (PM_{10})	1.38	6.05
Total Particulate Matter (TSP)	1.38	6.05
Sulfur Dioxide (SO_2)	0.06	0.26
Volatile Organic Compounds (VOC)	0.58	2.6
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.02	0.1
Hexame Isomers	0.0028	0.01
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Criteria pollutant emission factors were obtained from AP-42 5th edition for natural gas combustion. Hazardous air pollutant emission factors obtained from the EPA's SPECIATE database for natural gas combustion.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

45 CSR§2-3.1. Opacity – Title V Permit Condition 4.1.1.

45 CSR§45-2-2.03. Opacity – Title V Permit Condition 4.1.2.

45 CSR§45-2-4.1b. Particulate Emission Limit – Title V Permit Condition 4.1.3.

45 CSR§45-2-9.2. Control Practices – Title V Permit Condition 4.1.4.

45 CSR§45-10-3.1e. Sulfur Dioxide Limit – Title V Permit Condition 4.1.5.

45 CSR§45-7-7.1a. PM and Sulfur Dioxide Limit – Title V Permit Condition 4.4.1.

_X_ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45 CSR§2-3.1. Opacity – Title V Permit Condition 4.1.1. – Condition met by firing natural gas only and recordkeeping.

45 CSR§45-2-2.03. Opacity – Title V Permit Condition 4.1.2. – Condition met by firing natural gas only and recordkeeping.

45 CSR§45-2-4.1b. Particulate Emission Limit – Title V Permit Condition 4.1.3. – Condition met by firing natural gas only and recordkeeping.

45 CSR§45-2-9.2. Control Practices – Title V Permit Condition 4.1.4. – Condition met by firing natural gas only and recordkeeping.

45 CSR§45-10-3.1e. Sulfur Dioxide Limit – Title V Permit Condition 4.1.5. – Condition met by firing natural gas only and recordkeeping.

45 CSR§45-7-7.1a. PM and Sulfur Dioxide Limit – Title V Permit Condition 4.4.1. – Maintain records for five years as required.

40 CFR 63 Subpart DDDDD – Initial notification submitted by Wheeling Pittsburgh, and boilers only fire natural gas.

Are you in compliance with all applicable requirements for this emission unit? _X_ Yes ___ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F.**

ATTACHMENT E - Emission Unit Form

Emission Unit Description **Modified Coil Coating Line #1**

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
001-01, 001-02, 1S, 2S, 3S, 4S, 7S, and 8S	Surface Cleaning Section, Drying Oven, Primer Coater, Primer Bake Oven, Primer Quench and Finish Coater, Finish Bake Oven and Finish Quench.	Regenerative Thermal Oxidizer

Provide a description of the emission unit (type, method of operation, design parameters, etc.
A series of cleaning tanks is used to clean the steel before the application of primer and finish coatings. The cleaning tanks include three hot rinse tanks, cold rinse, phosphoric acid rinse, zinc phosphatizing, cleaner, brush machine, and pre-clean tanks. This process is followed by a drying oven. A new primer and finish oven system and improvement of the capture systems were part of recent modifications performed on the Coil Coating Line #1. Also installed was a new Regenerative Thermal Oxidizer (RTO) for controlling emissions from Coil Coating Line #1. Installation of this new control equipment included the removal of quenching stacks and the prior control equipment collection to the ovens. The quenching, coating room and oven emissions for both the primer and finish sections are destroyed by the new RTO.

Manufacturer:	**Model number:**	**Serial number:**
NA	NA	NA
Construction date:	**Installation date:**	**Modification date(s):**
1/1/1960	1/1/1960	5/15/2005

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
200,000 tons of coated steel

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
12 gallons per hour – Primer 58 gallons per hour - Finish	200,000 tons coated steel per year	8760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel?	**If yes, is it?**
_X_ Yes ___ No	___ Indirect Fired _X_ Direct Fired

Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**
Drying Oven = 4 Mcf/hour Primer Curing Oven = 15 Mcf/hour Finish Curing Oven = 15 Mcf/hour RTO = 18Mcf/hour	Drying Oven = 4 MMBtu/hour Primer Curing Oven = (3) 5 MMBtu/hour Finish Curing Oven = (3) 5 MMBtu/hour RTO = (2) 9 MMBtu/hour

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Primary = Natural Gas – 48,000 ft^3/hr and 420,480,000 ft^3/yr
Secondary = None

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	negligible	negligible	1,000

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	4.03	17.65
Nitrogen Oxides (NO_X)	5.16	22.6
Particulate Matter (PM_{10})	1.6	7.01
Total Particulate Matter (TSP)	1.6	7.01
Sulfur Dioxide (SO_2)	0.028	0.12
Volatile Organic Compounds (VOC)	11.02	48.27
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Formaldehyde	0.26	0.37
Isophorone	2.09	2.93
Ethylbenzene	1.38	1.94
Methyl Isobutyl Ketone	1.04	1.46
Hexane	0.002	0.008
Cumene	0.26	0.37
Napthalene	1.47	2.07
Xylene	4.63	6.51
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Emissions factors are from AP-42 for natural gas combustion. Emission factors for the coating solvents are mass balance done on MSDS weight percent for individual components. The VOC emission factor and control efficiency for the RTO are from the manufacturer's specifications.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

45 CSR§6-4.3. Opacity Restriction (3C) – Title V Permit Condition 5.1.1.
45 CSR§6-4.4. Start-Up Opacity Restriction (3C) – Title V Permit Condition 5.1.2.
45 CSR§7-3.1. Opacity Restriction (001-02, 1S, 2S) – Title V Permit Condition 5.1.3.
45 CSR§7-3.2. Opacity Restriction (001-02, 1S, 2S) – Title V Permit Condition 5.1.4.
45 CSR§6-4.1. Particulate Matter Emission Limit (3C) – Title V Permit Condition 5.1.5.
45 CSR§7-4.1. Particulate Matter Emission Limit – Title V Permit Condition 5.1.6.
45 CSR§10-4.1. Sulfur Dioxide Limit – Title V Permit Condition 5.1.7.
40 CFR 63 Subpart SSSS§63.5130(a). Applicable Requirements – Title V Permit Condition 5.1.8.
45 CSR§30-5.1.c Significant Modification Application – Title V Permit Condition 5.1.9.
45 CSR§30-5.1.c. Visual Emission Checks (3C) – Title V Permit Condition 5.2.1.
45 CSR§45-7A-2.1 (a)(b) Visual Emission Checks (1S, 2S) – Title V Permit Condition 5.2.2.
45 CSR§30-5.1.c. Fuel Usage Records – Title V Permit Condition 5.4.1.
45 CSR§30-5.1.c. Paint Usage Records – Title V Permit Condition 5.4.2.
Permit#R13-2379C Condition A.6. – RTO Emission Limits – To be added to new Title V Permit
Permit#R13-2379C Condition A.7. – 98% Destruction Efficiency – To be added to new Title V Permit
Permit#R13-2379C Condition A.8. – Operation Requirements – To be added to new Title V Permit
Permit#R13-2379C Condition A.9. – Natural Gas Restriction – To be added to new Title V Permit
40 CFR Part 60-Subpart TT - NSPS

_X_ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

45 CSR§6-4.3. Opacity Restriction (3C) – Title V Permit Condition 5.1.1. – The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.

45 CSR§6-4.4. Start-Up Opacity Restriction (3C) – Title V Permit Condition 5.1.2. – The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.

45 CSR§7-3.1. Opacity Restriction (001-02, 1S, 2S) – Title V Permit Condition 5.1.3. - – The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.

45 CSR§7-3.2. Opacity Restriction (001-02, 1S, 2S) – Title V Permit Condition 5.1.4. – The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.

45 CSR§6-4.1. Particulate Matter Emission Limit (3C) – Title V Permit Condition 5.1.5. – The particulate matter emission limit is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.

45 CSR§7-4.1. Particulate Matter Emission Limit – Title V Permit Condition 5.1.6. - The particulate matter emission limit is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.

45 CSR§10-4.1. Sulfur Dioxide Limit – Title V Permit Condition 5.1.7. - The sulfur dioxide emission limit is met by firing natural gas and maintaining the proper records.

40 CFR 63 Subpart SSSS§63.5130(a). Applicable Requirements – Title V Permit Condition 5.1.8. – The requirements have been met by the deadline.

45 CSR§30-5.1.c Significant Modification Application – Title V Permit Condition 5.1.9. – Application submitted by the deadline.

45 CSR§30-5.1.c. Visual Emission Checks (3C) – Title V Permit Condition 5.2.1. - Compliance demonstrated by performing the emission checks and recordkeeping.

45 CSR§45-7A-2.1 (a)(b) Visual Emission Checks (1S, 2S) – Title V Permit Condition 5.2.2. - Compliance demonstrated by performing the emission checks and recordkeeping.

45 CSR§30-5.1.c. Fuel Usage Records – Title V Permit Condition 5.4.1. - Compliance demonstrated through the appropriate monitoring and recordkeeping.

45 CSR§30-5.1.c. Paint Usage Records – Title V Permit Condition 5.4.2. - Compliance demonstrated through the appropriate monitoring and recordkeeping.

Permit#R13-2379C Condition A.6. – RTO Emission Limits – To be added to new Title V Permit - Compliance demonstrated through the appropriate monitoring and recordkeeping.

Permit#R13-2379C Condition A.7. – 98% Destruction Efficiency – To be added to new Title V Permit – Compliance demonstrated through monitoring the temperature in the combustion chamber with a calibrated device.

Permit#R13-2379C Condition A.8. – Operation Requirements – To be added to new Title V Permit – Line not operated without functional RTO.

Permit#R13-2379C Condition A.9. – Natural Gas Restriction – To be added to new Title V Permit - Compliance demonstrated through the appropriate monitoring and recordkeeping.

40 CFR Part 60-Subpart TT – NSPS – Facility complies with 40 CFR Part 63, Subpart SSSS.

Are you in compliance with all applicable requirements for this emission unit? _X_Yes ___No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F.**

ATTACHMENT E - Emission Unit Form

Emission Unit Description **Coil Coating Line #2**

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
008/1, 008/2, 008/3, 008/4, and 008/5	Surface Treatment, Drying Oven, Coater Room, Curing Oven, and Quench Tank.	Regenerative Thermal Oxidizer

Provide a description of the emission unit (type, method of operation, design parameters, etc.
The seven-stage surface treatment consists of two sets of alkaline sprays, cold water brushing, three hot water spray rinse stages, and phosphoric acid sprays. The drying oven is a natural gas fired oven that is used to remove water from the steel strip after it exits the surface treatment tanks and chemical roll coater and prior to the application of coating. The coater is a top and bottom coater that applies coating to the steel strip. The curing oven is a natural gas fired oven that is used to cure coating onto the steel strip. The quench tank applies water sprays to cool the steel strip as it exits the curing oven.

Manufacturer:	**Model number:**	**Serial number:**
Fata-Hunter	NA	NA
Construction date:	**Installation date:**	**Modification date(s):**
2002	2002	NA

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
900 tons per day of coated steel

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
38 gallons per hour – Coating	328,500 tons coated steel per year	8760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? __X__Yes ___ No	**If yes, is it?** ___ Indirect Fired __X__Direct Fired

Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**
Drying Oven = 6 Mcf/hour Curing Oven = 12 Mcf/hour	Drying Oven = 6 MMBtu/hour Primer Curing Oven = 12 MMBtu/hour

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
Primary = Natural Gas – 23,000 ft^3/hr and 197,064,000 ft^3/yr
Secondary = None

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
Natural Gas	negligible	negligible	1,000

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	2.43	9.35
Nitrogen Oxides (NO_X)	3.65	14.48
Particulate Matter (PM_{10})	0.22	0.87
Total Particulate Matter (TSP)	0.22	0.87
Sulfur Dioxide (SO_2)	0.02	0.08
Volatile Organic Compounds (VOC)	2.93	11.66
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
Total	1.10	4.13
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Emissions factors are from AP-42 for natural gas combustion. Emission factors for the coating solvents are mass balance done on MSDS weight percent for individual components. The VOC emission factor and control efficiency for the RTO are from the manufacturer's specifications.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

45 CSR§6-4.3. Opacity Restriction (C03) – Title V Permit Condition 6.1.1.

45 CSR§6-4.4. Start-Up Opacity Restriction (C03) – Title V Permit Condition 6.1.2.

45 CSR§7-3.1. Opacity Restriction (002-01, 002-02) – Title V Permit Condition 6.1.3.

45 CSR§7-3.2. Opacity Restriction (002-01, 002-02) – Title V Permit Condition 6.1.4.

45 CSR§7-4.1. Particulate Matter Emission Limit – Title V Permit Condition 6.1.5.

45 CSR§10-4.1. Sulfur Dioxide Restriction (C03) – Title V Permit Condition 6.1.6.

Permit #R13-2379B Condition A.1 RTO Destruction Efficiency – Title V Permit Condition 6.1.7.

Permit #R13-2379B Condition A.9 HAP Recordkeeping and Reporting – Title V Permit Condition 6.1.8. – Moved to Facility-Wide Requirements in accordance with R13-2379C.

Permit #R13-2379B Condition A.10 TAP Recordkeeping and Reporting – Title V Permit Condition 6.1.9.

Permit #R13-2379B Condition A.3 Coating Use Restriction – Title V Permit Condition 6.1.10.

Permit #R13-2379B Condition A.7 Nat. Gas Restriction (002-02, 002-04, C03) – Title V Permit Condition 6.1.11.

40 CFR 63 Subpart SSSS§63.5120(a)(1). HAP Limit – Title V Permit Condition 6.1.12.

40 CFR 60 Subpart TT§60.465(b)(2) and 40 CFR 63 Subpart SSSS§63.5121(a). RTO Temp. (C03) – Title V Permit Condition 6.1.13.

40 CFR 60 Subpart TT§60.462. VOC Limit – Title V Permit Condition 6.1.14.

Permit #R13-2379B Condition A.2 RTO Limits (C03) – Title V Permit Condition 6.1.15.

Permit #R13-2379B Condition A.4 Capture Efficiency – Title V Permit Condition 6.1.16. – Moved to Facility-Wide Requirements in accordance with R13-2379C.

Permit #R13-2379B Condition A.6 Chemical Dryer Limits – Title V Permit Condition 6.1.17.

45 CSR§30-5.1.c. Visual Emission Checks (C03) – Title V Permit Condition 6.2.1.

45 CSR§45-7A-2.1 (a)(b) Visual Emission Checks (002-01, 002-02) – Title V Permit Condition 6.2.2.

Permit #R13-2379B Condition A.1.b,c,d,e RTO Requirements (C03) – Title V Permit Condition 6.2.3.

Permit #R13-2379B Condition B.9 Natural Gas Records – Title V Permit Condition 6.2.4.

40 CFR 63 Subpart SSSS§63.5150(a)(3) and 63.5121(a). RTO Temp. Sensor – Title V Permit Condition 6.2.5.

40 CFR 63 Subpart SSSS§63.5150(a)(4). Capture System – Title V Permit Condition 6.2.6.

45 CSR§30-5.1.c. Pressure Drop – Title V Permit Condition 6.2.7.

40 CFR 63 Subpart SSSS§63.5170. Coating Requirements – Title V Permit Condition 6.2.8.

Permit #R13-2379B Condition B.5-7 & 40 CFR 60, Subpart TT§60.463 Testing – Title V Permit Condition 6.3.1.

40 CFR 63 Subpart SSSS§63.5160. Capture Efficiency – Title V Permit Condition 6.3.2.

Permit #R13-2379B Condition A.7 and B.9 Fuel Usage Records – Title V Permit Condition 6.3.3.

Permit #R13-2379B Condition A.5 and B.8 VOC and HAP Limits – Title V Permit Condition 6.3.4.

45 CSR§30-5.1.c. Fuel Usage Records – Title V Permit Condition 6.4.1.

Permit #R13-2379B Condition B.5 & 40 CFR 60, Subpart TT§60.464(c), §60.465(e), Subpart A, §60.11(d) Temperature Recordkeeping – Title V Permit Condition 6.4.2.

40 CFR 63 Subpart SSSS§63.5190(a). Recordkeeping – Title V Permit Condition 6.4.3.

Permit #R13-2379B Condition A.2 and B.8 VOC and HAP Reporting – Title V Permit Condition 6.5.1.

Permit #R13-2379B Condition A.9 New Coating Reporting – Title V Permit Condition 6.5.2.

__X__ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Permit #R13-2379B Condition B.5 & 40 CFR 60, Subpart TT§60.465(d) Compliance Reporting – Title V Permit Condition 6.5.3.

40 CFR 63 Subpart SSSS§63.5180(a). Reporting – Title V Permit Condition 6.5.4.

45 CSR§6-4.3. Opacity Restriction (C03) – Title V Permit Condition 6.1.1. – The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.

45 CSR§6-4.4. Start-Up Opacity Restriction (C03) – Title V Permit Condition 6.1.2. – The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.

45 CSR§7-3.1. Opacity Restriction (002-01, 002-02) – Title V Permit Condition 6.1.3. – The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.

45 CSR§7-3.2. Opacity Restriction (002-01, 002-02) – Title V Permit Condition 6.1.4. – The opacity restriction is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.

45 CSR§7-4.1. Particulate Matter Emission Limit – Title V Permit Condition 6.1.5. - The particulate matter limit is met by firing natural gas, doing monthly visual checks, and maintaining the proper records.

45 CSR§10-4.1. Sulfur Dioxide Restriction (C03) – Title V Permit Condition 6.1.6. - The sulfur dioxide limit is met by firing natural gas and maintaining the proper records.

Permit #R13-2379B Condition A.1 RTO Destruction Efficiency – Title V Permit Condition 6.1.7. – Compliance demonstrated through monitoring the temperature in the combustion chamber with a calibrated device.

Permit #R13-2379B Condition A.9 HAP Recordkeeping and Reporting – Title V Permit Condition 6.1.8. - Moved to Facility-Wide Requirements in accordance with R13-2379C.

Permit #R13-2379B Condition A.10 TAP Recordkeeping and Reporting – Title V Permit Condition 6.1.9. - Compliance demonstrated through the appropriate recordkeeping and reporting.

Permit #R13-2379B Condition A.3 Coating Use Restriction – Title V Permit Condition 6.1.10. - Compliance demonstrated through the appropriate recordkeeping and reporting.

Permit #R13-2379B Condition A.7 Nat. Gas Restriction (002-02, 002-04, C03) – Title V Permit Condition 6.1.11. - Compliance demonstrated through the appropriate recordkeeping.

40 CFR 63 Subpart SSSS§63.5120(a)(1). HAP Limit – Title V Permit Condition 6.1.12. - Compliance demonstrated through the appropriate monitoring and recordkeeping.

40 CFR 60 Subpart TT§60.465(b)(2) and 40 CFR 63 Subpart SSSS§63.5121(a). RTO Temp. (C03) – Title V Permit Condition 6.1.13. - Compliance demonstrated through the appropriate monitoring and recordkeeping.

40 CFR 60 Subpart TT§60.462. VOC Limit – Title V Permit Condition 6.1.14. - Compliance demonstrated through the appropriate recordkeeping.

Permit #R13-2379B Condition A.2 RTO Limits (C03) – Title V Permit Condition 6.1.15. - Compliance demonstrated through the appropriate recordkeeping.

Permit #R13-2379B Condition A.4 Capture Efficiency – Title V Permit Condition 6.1.16. - Moved to Facility-Wide Requirements in accordance with R13-2379C.

Permit #R13-2379B Condition A.6 Chemical Dryer Limits – Title V Permit Condition 6.1.17. - Compliance demonstrated through the appropriate monitoring and recordkeeping.

45 CSR§30-5.1.c. Visual Emission Checks (C03) – Title V Permit Condition 6.2.1. - Compliance demonstrated by performing the emission checks and recordkeeping.

45 CSR§45-7A-2.1 (a)(b) Visual Emission Checks (002-01, 002-02) – Title V Permit Condition 6.2.2. - Compliance demonstrated by performing the emission checks and recordkeeping.

Permit #R13-2379B Condition A.1.b,c,d,e RTO Requirements (C03) – Title V Permit Condition 6.2.3. - Compliance demonstrated through the appropriate monitoring and recordkeeping.

Permit #R13-2379B Condition B.9 Natural Gas Records – Title V Permit Condition 6.2.4. - Compliance demonstrated through the appropriate recordkeeping.

Are you in compliance with all applicable requirements for this emission unit? _X_ Yes ___ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F.**

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

40 CFR 63 Subpart SSSS§63.5150(a)(3) and 63.5121(a). RTO Temp. Sensor – Title V Permit Condition 6.2.5. - Compliance demonstrated through monitoring the temperature in the combustion chamber with a calibrated device.

40 CFR 63 Subpart SSSS§63.5150(a)(4). Capture System – Title V Permit Condition 6.2.6. - Compliance demonstrated through the appropriate monitoring and recordkeeping.

45 CSR§30-5.1.c. Pressure Drop – Title V Permit Condition 6.2.7. - Compliance demonstrated through the appropriate monitoring and recordkeeping.

40 CFR 63 Subpart SSSS§63.5170. Coating Requirements – Title V Permit Condition 6.2.8. - Compliance demonstrated through the appropriate monitoring and recordkeeping.

Permit #R13-2379B Condition B.5-7 & 40 CFR 60, Subpart TT§60.463 Testing – Title V Permit Condition 6.3.1. - Compliance demonstrated through the appropriate tests and recordkeeping.

40 CFR 63 Subpart SSSS§63.5160. Capture Efficiency – Title V Permit Condition 6.3.2. - Compliance demonstrated through the appropriate monitoring and recordkeeping.

Permit #R13-2379B Condition A.7 and B.9 Fuel Usage Records – Title V Permit Condition 6.3.3. - Compliance demonstrated through the appropriate recordkeeping.

Permit #R13-2379B Condition A.5 and B.8 VOC and HAP Limits – Title V Permit Condition 6.3.4. - Compliance demonstrated through the appropriate recordkeeping.

45 CSR§30-5.1.c. Fuel Usage Records – Title V Permit Condition 6.4.1. - Compliance demonstrated through the appropriate monitoring and recordkeeping.

Permit #R13-2379B Condition B.5 & 40 CFR 60, Subpart TT§60.464(c), §60.465(e), Subpart A, §60.11(d) Temperature Recordkeeping – Title V Permit Condition 6.4.2. - Compliance demonstrated through the appropriate maintenance, monitoring, and recordkeeping.

40 CFR 63 Subpart SSSS§63.5190(a). Recordkeeping – Title V Permit Condition 6.4.3. - Compliance demonstrated through the appropriate recordkeeping.

Permit #R13-2379B Condition A.2 and B.8 VOC and HAP Reporting – Title V Permit Condition 6.5.1. - Compliance demonstrated through the appropriate reporting.

Permit #R13-2379B Condition A.9 New Coating Reporting – Title V Permit Condition 6.5.2. - Compliance demonstrated through the appropriate reporting.

Permit #R13-2379B Condition B.5 & 40 CFR 60, Subpart TT§60.465(d) Compliance Reporting – Title V Permit Condition 6.5.3. - Compliance demonstrated through the appropriate reporting.

40 CFR 63 Subpart SSSS§63.5180(a). Reporting – Title V Permit Condition 6.5.4. - Compliance demonstrated through the appropriate reporting.

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 006-01	**Emission unit name:** Facility paved roads and parking lots.	**List any control devices associated with this emission unit.** None

Provide a description of the emission unit (type, method of operation, design parameters, etc.

Roadways in and around the facility are minimal and the road surfaces are identical to the nearby Route 2 roadway. However, potential fugitive PM10 emissions from traffic on these roadways is approximately 2.5 tons per year. Roadways are regulated by the WV regulation 7 Work Practice Standard which requires minimization of emissions from these surfaces by paving or water suppression. The facility complies with this requirement by having paved roads and using chemical dust suppressants.

Manufacturer: NA	**Model number:** NA	**Serial number:** NA
Construction date: NA	**Installation date:** NA	**Modification date(s):** NA

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
NA

Maximum Hourly Throughput: NA	**Maximum Annual Throughput:** NA	**Maximum Operating Schedule:** NA

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? __Yes _X_ No	**If yes, is it?** ___ Indirect Fired ___Direct Fired
Maximum design heat input and/or maximum horsepower rating: NA	**Type and Btu/hr rating of burners:** NA

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
NA

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value

Emissions Data

Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)		
Nitrogen Oxides (NO_X)		
Lead (Pb)		
Particulate Matter (PM_{10})	3.82	2.47
Total Particulate Matter (TSP)	4.82	3.14
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOC)		

Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY

Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Criteria pollutant emission factors were obtained form EPA AP-42 4th edition for industrial paved roads.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

Permit No. 2379B Condition B.3. and 45 CSR§7-5.2 Operating Practices – Title V Permit Condition 7.1.1.

45 CSR§7-5.2 Fugitive Dust Control – Title V Permit Condition 7.2.1.

45 CSR§40-30.5.1c Dust Suppressant Recordkeeping – Title V Permit Condition 7.4.1.

____ Permit Shield

For all applicable requirements listed above, provide monitoring/testing/recordkeeping/reporting which shall be used to demonstrate compliance. If the method is based on a permit or rule, include the condition number or citation. (Note: Each requirement listed above must have an associated method of demonstrating compliance. If there is not already a required method in place, then a method must be proposed.)

Permit No. 2379B Condition B.3. and 45 CSR§7-5.2 Operating Practices – Title V Permit Condition 7.1.1. – Facility roadways are paved.

45 CSR§7-5.2 Fugitive Dust Control – Title V Permit Condition 7.2.1. – Facility roadways are paved.

45 CSR§40-30.5.1c Dust Suppressant Recordkeeping – Title V Permit Condition 7.4.1. – Dust suppressant application records kept as required.

Are you in compliance with all applicable requirements for this emission unit? _X_ Yes ___ No

If no, complete the **Schedule of Compliance Form** as **ATTACHMENT F.**

ATTACHMENT E - Emission Unit Form

Emission Unit Description **Modified Coil Coating Line #1/Miscellaneous**

Emission unit ID number:	**Emission unit name:**	**List any control devices associated with this emission unit.**
006-03 (Proposed)	Roll Forming	

Provide a description of the emission unit (type, method of operation, design parameters, etc.
Roll forming is part of the roof deck line. Emissions from this source originate from the vanishing oil that is applied to the steel strips during the forming process.

Manufacturer:	**Model number:**	**Serial number:**
NA	NA	NA
Construction date:	**Installation date:**	**Modification date(s):**
1/1/1960	1/1/1960	NA

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):

Maximum Hourly Throughput:	**Maximum Annual Throughput:**	**Maximum Operating Schedule:**
		8760 hours/year

Fuel Usage Data **(fill out all applicable fields)**

Does this emission unit combust fuel? ___Yes __X__No	**If yes, is it?** ___ Indirect Fired ___Direct Fired

Maximum design heat input and/or maximum horsepower rating:	**Type and Btu/hr rating of burners:**
NA	NA

List the primary fuel type(s) and if applicable, the secondary fuel type(s). For each fuel type listed, provide the maximum hourly and annual fuel usage for each.
NA

Describe each fuel expected to be used during the term of the permit.

Fuel Type	Max. Sulfur Content	Max. Ash Content	BTU Value
NA			

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Volatile Organic Compounds (VOC)	8.4 (typical max)	36.8 (typical max)
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
	0	0
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY

List the method(s) used to calculate the potential emissions (include dates of any stack tests conducted, versions of software used, source and dates of emission factors, etc.).

Mass Balance used to calculate emissions.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the rule citation and/or permit with the condition number. If an emission limit is calculated based on the type of source and design capacity or if a standard is based on a design parameter, this information should also be included.

None

____ Permit Shield

Title V Renewal Application Attachment G – Air Pollution Control Project # 050050484.0001	Wheeling Corrugating Company Beech Bottom Plant DAQ Plant ID: 009-00004

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: 3C/ Stack 11E	**List all emission units associated with this control device.** Coil Coating Line #1 - Primer Coating Room (1S), Finish Coating Room (2S), Primer Quench (3S), Finish Quench (4S), Primer Oven (7S), and Finish Oven (8S).	
Manufacturer: Epcon	**Model number:** NA	**Installation date:** 4/17/2005

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	_X_ Other (describe) Regenerative Thermal Oxidizer
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
VOC	100%	98%
HAPS	100%	98%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

Regenerative Thermal Oxidizer has three chambers and handles approximately 85,800 acfm at a velocity of approximately 113.85 feet per second. The RTO fires only natural gas and operates at a temperature of 1,480 degrees Fahrenheit (as a 3-hour average).

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ No

If Yes, **Complete ATTACHMENT H**

Describe the parameters monitored and/or methods used to indicate performance of this control device.

A combination of the following items specified in permit R13-2379C are performed:

- RTO operated during all CCL#1 operations, any deviations are reported.
- Strictly fire natural gas.
- Recordkeeping.
- Reporting.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: C03	**List all emission units associated with this control device.** Coil Coating Line #2 – Drying Oven (002-02), Coater (002-03), and Curing Oven (002-04).	
Manufacturer: AWS, Incorporated	**Model number:** NA	**Installation date:** 6/1/2001

Type of Air Pollution Control Device:

___ Baghouse/Fabric Filter	___ Venturi Scrubber	___ Multiclone
___ Carbon Bed Adsorber	___ Packed Tower Scrubber	___ Single Cyclone
___ Carbon Drum(s)	___ Other Wet Scrubber	___ Cyclone Bank
___ Catalytic Incinerator	___ Condenser	___ Settling Chamber
___ Thermal Incinerator	___ Flare	_X_ Other (describe) Regenerative Thermal Oxidizer
___ Wet Plate Electrostatic Precipitator		___ Dry Plate Electrostatic Precipitator

List the pollutants for which this device is intended to control and the capture and control efficiencies.

Pollutant	Capture Efficiency	Control Efficiency
VOC	100%	98%
HAP	100%	98%

Explain the characteristic design parameters of this control device (flow rates, pressure drops, number of bags, size, temperatures, etc.).

This Regenerative Thermal Oxidizer has two chambers and is used to control VOC emissions from the Coil Coating Line #2 coating room, curing oven, and quenching.

Is this device subject to the CAM requirements of 40 C.F.R. 64? ___ Yes _X_ No

If Yes, **Complete ATTACHMENT H**

Describe the parameters monitored and/or methods used to indicate performance of this control device.

A combination of the following items specified in the Title V permit are performed:

- Monthly visible emission checks.
- Minimum 1,661 degrees F as a 3-hour average combustion chamber temperature maintained.
- Maintain pressure drop in coating room.'
- Strictly fire natural gas.
- Testing.
- Recordkeeping.
- Reporting.

Title V Renewal Application Attachment H – CAM Form Project # 050050484.0001	Wheeling Corrugating Company Beech Bottom Plant DAQ Plant ID: 009-00004

ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form

For definitions and information about the CAM rule, please refer to 40 CFR Part 64. Additional information (including guidance documents) may also be found at http://www.epa.gov/ttn/emc/cam.html

CAM APPLICABILITY DETERMINATION

1) Does the facility have a PSEU (Pollutant-Specific Emissions Unit considered separately with respect to **EACH** regulated air pollutant) that is subject to CAM (40 CFR Part 64), which must be addressed in this CAM plan submittal? To determine applicability, a PSEU must meet **all** of the following criteria (*If No, then the remainder of this form need not be completed*): ☐ YES ☒ NO

a. The PSEU is located at a major source that is required to obtain a Title V permit;

b. The PSEU is subject to an emission limitation or standard for the applicable regulated air pollutant that is NOT exempt;

LIST OF EXEMPT EMISSION LIMITATIONS OR STANDARDS:

- NSPS (40 CFR Part 60) or NESHAP (40 CFR Parts 61 and 63) proposed after 11/15/1990.
- Stratospheric Ozone Protection Requirements.
- Acid Rain Program Requirements.
- Emission Limitations or Standards for which a WVDEP Division of Air Quality Title V permit specifies a continuous compliance determination method, as defined in 40 CFR §64.1.
- An emission cap that meets the requirements specified in 40 CFR §70.4(b)(12).

c. The PSEU uses an add-on control device (as defined in 40 CFR §64.1) to achieve compliance with an emission limitation or standard;

d. The PSEU has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than the Title V Major Source Threshold Levels; AND

e. The PSEU is NOT an exempt backup utility power emissions unit that is municipally-owned.

BASIS OF CAM SUBMITTAL

2) Mark the appropriate box below as to why this CAM plan is being submitted as part of an application for a Title V permit:

☐ RENEWAL APPLICATION. **ALL** PSEUs for which a CAM plan has NOT yet been approved need to be addressed in this CAM plan submittal.

☐ INITIAL APPLICATION (submitted after 4/20/98). **ONLY** large PSEUs (i. e., PSEUs with potential post-control device emissions of an applicable regulated air pollutant that are equal to or greater than Major Source Threshold Levels) need to be addressed in this CAM plan submittal.

☐ SIGNIFICANT MODIFICATION TO LARGE PSEUs. **ONLY** large PSEUs being modified after 4/20/98 need to be addressed in this cam plan submittal. For large PSEUs with an approved CAM plan, Only address the appropriate monitoring requirements affected by the significant modification.