



**ROLL COATER, INC.
WEIRTON
PLANT ID NO. 03-54-00900054
PERMIT NO. R30-00900054-2003**

**WEST VIRGINIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
TITLE V PERMIT RENEWAL APPLICATION**

DECEMBER 2007

CEC Project 070-550

TITLE V PERMIT RENEWAL APPLICATION
Plant ID No. 03-54-00900054
Permit No. R30-00900054-2003

Roll Coater, Inc.
Weirton, WV

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**TITLE V PERMIT APPLICATION CHECKLIST
FOR ADMINISTRATIVE COMPLETENESS**

A complete application is demonstrated when all of the information required below is properly prepared, completed and attached. The items listed below are required information which must be submitted with a Title V permit application. Any submittal will be considered incomplete if the required information is not included.*

<input checked="" type="checkbox"/>	Two signed copies of the application (at least one <u>must</u> contain the original "Certification" page signed and dated in blue ink)
<input checked="" type="checkbox"/>	Correct number of copies of the application on separate CDs or diskettes, (i.e. at least one disc per copy)
<input checked="" type="checkbox"/>	*Table of Contents (needs to be included but not for administrative completeness)
<input checked="" type="checkbox"/>	Facility information
<input checked="" type="checkbox"/>	Description of process and products, including NAICS and SIC codes, and including alternative operating scenarios
<input checked="" type="checkbox"/>	Area map showing plant location
<input checked="" type="checkbox"/>	Plot plan showing buildings and process areas
<input checked="" type="checkbox"/>	Process flow diagram(s), showing all emission units, control equipment, emission points, and their relationships
<input checked="" type="checkbox"/>	Identification of all applicable requirements with a description of the compliance status, the methods used for demonstrating compliance, and a Schedule of Compliance Form (ATTACHMENT F) for all requirements for which the source is not in compliance
<input checked="" type="checkbox"/>	Listing of all active permits and consent orders (if applicable)
<input checked="" type="checkbox"/>	Facility-wide emissions summary
<input checked="" type="checkbox"/>	Identification of Insignificant Activities
<input checked="" type="checkbox"/>	ATTACHMENT D - Title V Equipment Table completed for all emission units at the facility except those designated as insignificant activities
<input checked="" type="checkbox"/>	ATTACHMENT E - Emission Unit Form completed for each emission unit listed in the Title V Equipment Table (ATTACHMENT D) and a Schedule of Compliance Form (ATTACHMENT F) for all requirements for which the emission unit is not in compliance
<input checked="" type="checkbox"/>	ATTACHMENT G - Air Pollution Control Device Form completed for each control device listed in the Title V Equipment Table (ATTACHMENT D)
<input checked="" type="checkbox"/>	ATTACHMENT H - Compliance Assurance Monitoring (CAM) Plan Form completed for each control device for which the "Is the device subject to CAM?" question is answered "Yes" on the Air Pollution Control Device Form (ATTACHMENT G)
<input checked="" type="checkbox"/>	General Application Forms signed by a Responsible Official
<input type="checkbox"/>	Confidential Information submitted in accordance with 45CSR31



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 I: General Information

Form with 10 sections: 1. Name of Applicant (ROLL COATER, INC.), 2. Facility Name (WEIRTON), 3. DAQ Plant ID No. (03-54-00900054), 4. Federal Employer ID No. (35-0901870), 5. Permit Application Type (Renewal), 6. Type of Business Entity (Corporation), 7. Is the Applicant the: (Both), 8. Number of onsite employees (75), 9. Governmental Code (Privately owned), 10. Business Confidentiality Claims (No).

11. Mailing Address		
Street or P.O. Box: 4502 FREEDOM WAY		
City: WEIRTON	State: WV	Zip: 26062-
Telephone Number: (304) 748-1557	Fax Number: (304) 794-3017	

12. Facility Location		
Street: 4502 FREEDOM WAY	City: WEIRTON	County: BROOKE
UTM Easting: 534.83 km	UTM Northing: 4,474.18 km	Zone: <input checked="" type="checkbox"/> 17 or <input type="checkbox"/> 18
Directions: FROM WHEELING, TAKE I-70 W TO OH-7 N. TAKE OH 7-N ABOUT 24 MILES TO WEIRTON EXIT. CROSS FORT STEUBEN BRIDGE TO WV. FORT STEUBEN BECOMES FREEDOM WAY. PLANT IS ON THE RIGHT.		
Portable Source? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Is facility located within a nonattainment area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, for what air pollutants?	
Is facility located within 50 miles of another state? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, name the affected state(s). OHIO PENNSYLVANIA	
Is facility located within 100 km of a Class I Area ¹ ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, name the area(s).	
If no, do emissions impact a Class I Area ¹ ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
¹ Class I areas include Dolly Sods and Otter Creek Wilderness Areas in West Virginia, and Shenandoah National Park and James River Fave Wilderness Area in Virginia.		

13. Contact Information		
Responsible Official: JANE NEAL		Title: MANUFACTURING MANAGER
Street or P.O. Box: 4502 FREEDOM WAY		
City: WEIRTON	State: WV	Zip: 26062-
Telephone Number: (304) 748-1557	Fax Number: (304) 794-3017	
E-mail address: JANE.NEAL@ROLLCOATER.COM		
Environmental Contact: CHARLES GRACIE		Title: EHS COORDINATOR
Street or P.O. Box: 4502 FREEDOM WAY		
City: WEIRTON	State: WV	Zip: 26062-
Telephone Number: (304) 748-1557	Fax Number: (304) 794-3017	
E-mail address: CHUCK.GRACIE@ROLLCOATER.COM		
Application Preparer: KRIS MACOSKEY		Title: SR. PROJECT MANAGER
Company: CIVIL & ENVIRONMENTAL CONSULTANTS, INC.		
Street or P.O. Box: 333 BALDWIN ROAD		
City: PITTSBURGH	State: PA	Zip: 15205-
Telephone Number: (412) 429-2324	Fax Number: (412) 429-2114	
E-mail address: KMACOSKEY@CECINC.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 COIL COATING	COATED SHEET METAL COILS	332812	3479

Provide a general description of operations.

METAL COILS DELIVERED TO THE FACILITY ARE FIRST BRUSHED TO REMOVE RESIDUAL CARBON, OXIDES, AND DIRT AND TO EXPOSE FRESH METAL SURFACE FOR CORROSION RESISTANCE TREATMENT. COIL PROCEEDS TO WET SECTION FOR CHEMICAL TREATMENT AND RINSE. COIL THEN PASSES THROUGH THE PRIME COATER, PRIME OVEN, AND PRIME QUENCH. FINISH COATER, FINISH OVEN, AND FINISH QUENCH STEPS COMPLETE THE PROCESS. AN AFTERBURNER IS USED TO CONTROL VOC EMISSIONS FROM THE PRIME OVEN AND FINISH OVEN EXHAUSTS. A WASTE HEAT EXCHANGER RECOVERS HEAT FROM THE AFTERBURNER EXHAUST TO GENERATE STEAM ON AN AS-NEEDED BASIS. WHEN STEAM IS NOT NEEDED, EXHAUST IS DIRECTED THROUGH THE BYPASS STACKS. AN ON-SITE WASTEWATER TREATMENT SYSTEM IS IN PLACE FOR PROCESS WASTEWATERS GENERATED FROM COIL CLEANING, COATING, AND RINSING.

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

19. Non Applicability Determinations
<p>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.</p> <p>CAM RULE (40CFR64). ROLL COATER IS EXEMPT FROM THE REQUIREMENT OF THE CAM RULE BECAUSE IT IS SUBJECT TO A NESHAP THAT WAS PROPOSED AFTER 11/15/90 (COIL COATING, 40 CFR 63, SUBPART SSSS) AS WELL AS THE NSPS FOR METAL COIL SURFACE COATING (40 CFR 60, SUBPART TT).</p> <p>45CSR21: REGULATION TO PREVENT AND CONTROL AIR POLLUTION FROM THE EMISSION OF VOLATILE ORGANIC COMPOUNDS. THIS RULE DOES NOT APPLY TO SOURCES IN BROOKE COUNTY, THEREFORE ROLL COATER IS NOT SUBJECT TO THE RULE.</p> <p>45CSR27: TO PREVENT AND CONTROL THE EMISSIONS OF TOXIC AIR POLLUTANTS. POTENTIAL FORMALDEHYDE EMISSIONS FROM ROLL COATER (0.44 TPY AND 880 LB/YR) ARE BELOW THE APPLICABILITY THRESHOLD OF 1,000 LB/YR. THEREFORE THE RULE DOES NOT APPLY.</p> <p>45CSR29: RULE REQUIRING THE SUBMISSION OF EMISSION STATEMENTS FOR VOLATILE ORGANIC COMPOUND EMISSIONS AND OXIDES OF NITROGEN EMISSIONS. THIS RULE DOES NOT APPLY BECAUSE ROLL COATER IS LOCATED IN BROOKE COUNTY.</p> <p>40CFR63, SUBPART JJJ: MACT STD. FOR PAPER AND OTHER WEB COATING. THIS RULE APPLIES TO COIL COATING LINES ON WHICH 85% OR MORE OF THE METAL COIL IS LESS THAN 0.15 MM THICK. THIS RULE DOES NOT APPLY BECAUSE ROLL COATER ONLY COATS METAL COIL THAT IS GREATER THAN 0.15 MM THICK.</p>
<input checked="" type="checkbox"/> 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.

RISK MANAGEMENT PLAN (40 CFR 68). ROLL COATER IS EXEMPT FROM THE RMP RULE BECAUSE IT DOES NOT HAVE ANY REGULATED SUBSTANCES IN A PROCESS ABOVE THE THRESHOLD QUANTITIES.

Permit Shield

20. Facility-Wide Applicable Requirements

List all facility-wide applicable requirements. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements).

OPEN BURNING (45CSR§6-3.1 AND 45CSR13, R13-1910B)

OPEN BURNING EXEMPTIONS (45CSR§6-3.2 AND 45CSR13, R13-1910B)

ASBESTOS (40CFR61 AND 45CSR13, R13-1910B)

ODOR (45CSR§4-3.1 AND 45CSR13, R13-1910B)

PERMANENT SHUTDOWN (45CSR§13-10.5 AND 45CSR13, R13-1910B)

STANDBY PLAN FOR REDUCING EMISSIONS (45CSR§11-5.2 AND 45CSR13, R13-1910B)

EMISSION INVENTORY (WV CODE §22-5-4(a) (14))

OZONE-DEPLETING SUBSTANCES (40CFR82, SUBPART F)

OPERATION IN ACCORDANCE WITH PLANS AND SPECIFICATIONS IN PERMIT APPLICATIONS AND MODIFICATIONS (45CSR13, R13-1910B)

MAINTAIN PARTICULATE MATTER CONTROL (45CSR§7-5.2)

MAINTENANCE OPERATIONS ARE EXEMPT FROM SECTION 4 OF 45CSR7 (45CSR§7-10.3)

QUARTERLY REPORTING OF VOC EMISSIONS >1.15 LB/GAL OR SEMIANNUAL

CONFIRMATION OF NO INSTANCES (40CFR60, SUBPART TT)

SURFACE COATING OF METAL COIL NESHAP (40 CFR 63, SUBPART SSSS)

NEW APPLICABLE REQUIREMENTS (45CSR30-4.3.h.1.B)

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.)

45CSR13, R13-1910B, CONDITION 3.3.1: STACK TESTING: PERMITTEE SHALL CONDUCT STACK TESTS TO DETERMINE COMPLIANCE WITH EMISSION LIMITATIONS IN ACCORDANCE WITH AN APPROVED TEST PROTOCOL. PROTOCOLS MUST BE SUBMITTED TO THE SECRETARY IN WRITING AT LEAST 30 DAYS PRIOR TO ANY TESTING. SECRETARY SHALL BE NOTIFIED 15 DAYS PRIOR TO TESTING. TESTING SHALL OCCUR ONCE DURING EACH PERMIT TERM.

45CSR30-5.1.c, CONDITION 3.3.2: IF SOURCES OF VISIBLE EMISSIONS ARE IDENTIFIED, CONDUCT AN EVALUATION PER 45CSR7A-2.1 a,b WITHIN 24 HOURS UNLESS THE VISIBLE EMISSION CONDITION IS CORRECTED IN A TIMELY MANNER AND THE UNITS ARE OPERATED AT NORMAL CONDITIONS.

45CSR5.1.c.2.A., CONDITION 3.4.1: MONITORING INFORMATION SHALL INCLUDE ITEMS SPECIFIED IN THE TITLE V OPERATING PERMIT.

45CSR30-5.1.c.2.B, R13-1910B, CONDITION 3.4.1.: RETAIN RECORDS OF ALL INFORMATION REQUIRED BY THE PERMIT IN A FORM SUITABLE AND READILY AVAILABLE FOR EXPEDITIOUS INSPECTION AND REVIEW FOR A PERIOD OF AT LEAST FIVE YEARS FROM THE DATE OF EACH OCCURRENCE. MAINTAIN AT LEAST THE CURRENT TWO YEARS ON SITE.

45CSR30-5.1.c, R13-1910B, CONDITION 3.4.2: ODOR – MAINTAIN RECORD OF ALL ODOR COMPLAINTS AND ANY INVESTIGATION OR RESPONSE IN RESPONSE TO COMPLAINTS.

45CSR13, R13-1910B, CONDITION 3.5.1: A RESPONSIBLE OFFICIAL SHALL CERTIFY ANY DOCUMENTS REQUIRED BY THIS PERMIT THAT ARE SUBMITTED TO DAQ AND/OR USEPA THAT, “BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION IN THE DOCUMENT ARE TRUE, ACCURATE AND COMPLETE.”

45CSR13, R13-1910B, CONDITION 3.5.2: PERMITTEE MAY REQUEST CONFIDENTIAL TREATMENT OF SUBMITTED REPORTS.

45CSR30-8: PERMITTEE SHALL SUBMIT A CERTIFIED EMISSIONS STATEMENT AND PAY FEES ON AN ANNUAL BASIS. A RECEIPT FOR THE APPROPRIATE FEE SHALL BE MAINTAINED ON SITE.

45CSR30-5.3.e.: PERMITTEE SHALL SUBMIT ANNUAL COMPLIANCE CERTIFICATION PRIOR TO MARCH 15 FOR THE PERIOD ENDING THE PRIOR DECEMBER 31.

45CSR30-5.1.c.3.A.: SEMI-ANNUAL MONITORING REPORTS SHALL BE SUBMITTED ON SEPTEMBER 15 FOR THE PERIOD 1/1 TO 6/30 AND MARCH 15 FOR THE PERIOD 7/1 TO 12/31.

40CFR63.5130(a): COMPLY WITH ALL APPLICABLE REQUIREMENTS OF 40 CFR 63, SUBPART SSSS.

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

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

20. Facility-Wide Applicable Requirements (Continued) - Attach additional pages as necessary.

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

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.)

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

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

Section 3: Facility-Wide Emissions

23. Facility-Wide Emissions Summary [Tons per Year]	
Criteria Pollutants	Potential Emissions
Carbon Monoxide (CO)	61.3
Nitrogen Oxides (NO _x)	68.3
Lead (Pb)	0
Particulate Matter (PM ₁₀) ¹	5.2
Total Particulate Matter (TSP)	5.2
Sulfur Dioxide (SO ₂)	2.08
Volatile Organic Compounds (VOC)	229.5
Hazardous Air Pollutants ²	Potential Emissions
CHROMIUM COMPOUNDS	0.07
HYDROGEN CHLORIDE	0.17
HYDROGEN FLUORIDE	0.50
FORMALDEHYDE	0.44
Regulated Pollutants other than Criteria and HAP	Potential Emissions
PHOSPHORIC ACID	0.25
NITRIC ACID	0.71

¹PM₁₀ is a component of TSP.
²For 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)	
<input checked="" type="checkbox"/>	1. Air compressors and pneumatically operated equipment, including hand tools.
<input checked="" type="checkbox"/>	2. Air contaminant detectors or recorders, combustion controllers or shutoffs.
<input checked="" type="checkbox"/>	3. Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumer, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
<input checked="" type="checkbox"/>	4. Bathroom/toilet vent emissions.
<input checked="" type="checkbox"/>	5. Batteries and battery charging stations, except at battery manufacturing plants.
<input checked="" type="checkbox"/>	6. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
<input type="checkbox"/>	7. Blacksmith forges.
<input checked="" type="checkbox"/>	8. Boiler water treatment operations, not including cooling towers.
<input checked="" type="checkbox"/>	9. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
<input type="checkbox"/>	10. CO ₂ lasers, used only on metals and other materials which do not emit HAP in the process.
<input checked="" type="checkbox"/>	11. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
<input checked="" type="checkbox"/>	12. Combustion units designed and used exclusively for comfort heating that use liquid petroleum gas or natural gas as fuel.
<input checked="" type="checkbox"/>	13. Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
<input checked="" type="checkbox"/>	14. Demineralized water tanks and demineralizer vents.
<input type="checkbox"/>	15. Drop hammers or hydraulic presses for forging or metalworking.
<input type="checkbox"/>	16. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.
<input type="checkbox"/>	17. Emergency (backup) electrical generators at residential locations.
<input type="checkbox"/>	18. Emergency road flares.
<input type="checkbox"/>	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: _____ _____ _____ _____ _____ _____ _____ _____ _____ _____

24. Insignificant Activities (Check all that apply)

<input type="checkbox"/>	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: _____ _____ _____ _____ _____
<input type="checkbox"/>	21. Environmental chambers not using hazardous air pollutant (HAP) gases.
<input checked="" type="checkbox"/>	22. Equipment on the premises of industrial and manufacturing operations used solely for the purpose of preparing food for human consumption.
<input type="checkbox"/>	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.
<input checked="" type="checkbox"/>	24. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.
<input checked="" type="checkbox"/>	25. Equipment used for surface coating, painting, dipping or spray operations, except those that will emit VOC or HAP.
<input checked="" type="checkbox"/>	26. Fire suppression systems.
<input checked="" type="checkbox"/>	27. Firefighting equipment and the equipment used to train firefighters.
<input type="checkbox"/>	28. Flares used solely to indicate danger to the public.
<input checked="" type="checkbox"/>	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.
<input type="checkbox"/>	30. Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation.
<input checked="" type="checkbox"/>	31. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
<input type="checkbox"/>	32. Humidity chambers.
<input type="checkbox"/>	33. Hydraulic and hydrostatic testing equipment.
<input checked="" type="checkbox"/>	34. Indoor or outdoor kerosene heaters.
<input type="checkbox"/>	35. Internal combustion engines used for landscaping purposes.
<input type="checkbox"/>	36. Laser trimmers using dust collection to prevent fugitive emissions.
<input checked="" type="checkbox"/>	37. Laundry activities, except for dry-cleaning and steam boilers.
<input checked="" type="checkbox"/>	38. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
<input checked="" type="checkbox"/>	39. Oxygen scavenging (de-aeration) of water.
<input type="checkbox"/>	40. Ozone generators.
<input checked="" type="checkbox"/>	41. Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant

24. Insignificant Activities (Check all that apply)

	owners/operators must still get a permit if otherwise requested.)
<input type="checkbox"/>	42. Portable electrical generators that can be moved by hand from one location to another. "Moved by Hand" means that it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance, or device.
<input checked="" type="checkbox"/>	43. Process water filtration systems and demineralizers.
<input type="checkbox"/>	44. Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
<input checked="" type="checkbox"/>	45. Repairs or maintenance where no structural repairs are made and where no new air pollutant emitting facilities are installed or modified.
<input checked="" type="checkbox"/>	46. Routing calibration and maintenance of laboratory equipment or other analytical instruments.
<input type="checkbox"/>	47. Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants. Shock chambers.
<input type="checkbox"/>	48. Shock chambers.
<input checked="" type="checkbox"/>	49. Solar simulators.
<input checked="" type="checkbox"/>	50. Space heaters operating by direct heat transfer.
<input type="checkbox"/>	51. Steam cleaning operations.
<input checked="" type="checkbox"/>	52. Steam leaks.
<input type="checkbox"/>	53. Steam sterilizers.
<input checked="" type="checkbox"/>	54. Steam vents and safety relief valves.
<input checked="" type="checkbox"/>	55. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
<input checked="" type="checkbox"/>	56. Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
<input type="checkbox"/>	57. Such other sources or activities as the Director may determine.
<input type="checkbox"/>	58. Tobacco smoking rooms and areas.
<input checked="" type="checkbox"/>	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: JANE NEAL

Title: MANUFACTURING MANAGER

Responsible official's signature:

Signature: Jane Neal

Signature Date: 18 Dec 2007

(Must be signed and dated in blue ink)

Note: Please check all applicable attachments included with this permit application:

<input checked="" type="checkbox"/>	ATTACHMENT A: Area Map
<input checked="" type="checkbox"/>	ATTACHMENT B: Plot Plan(s)
<input checked="" type="checkbox"/>	ATTACHMENT C: Process Flow Diagram(s)
<input checked="" type="checkbox"/>	ATTACHMENT D: Equipment Table
<input checked="" type="checkbox"/>	ATTACHMENT E: Emission Unit Form(s)
<input type="checkbox"/>	ATTACHMENT F: Schedule of Compliance Form(s)
<input checked="" type="checkbox"/>	ATTACHMENT G: Air Pollution Control Device Form(s)
<input checked="" type="checkbox"/>	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/dag, requested by phone (304) 926-0476, and/or obtained through the mail.

ATTACHMENT A
TITLE V PERMIT RENEWAL
Plant ID No. 03-54-00900054

Roll Coater, Inc.
Weirton
Permit No. R30-00900054-2003

AREA MAP



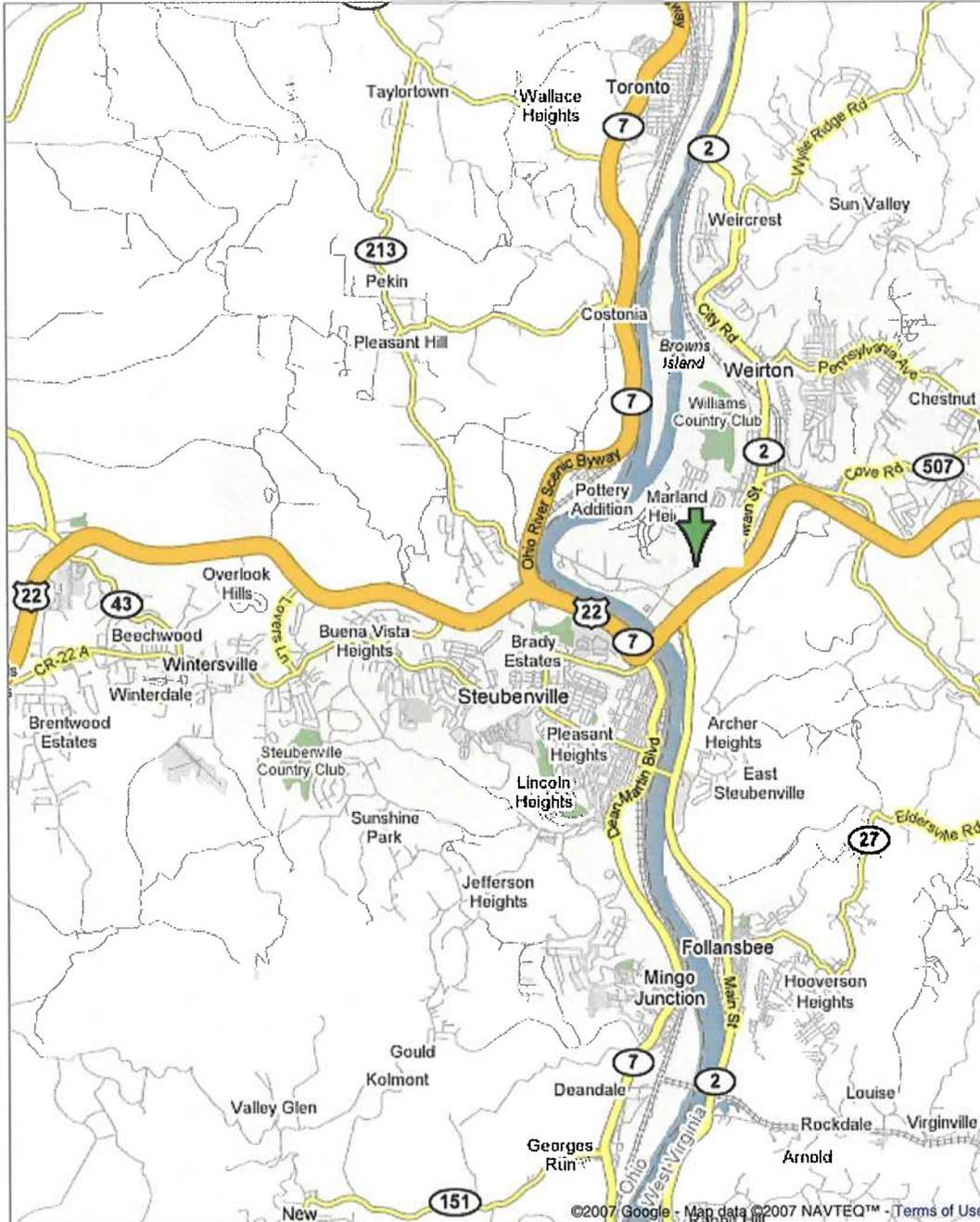
Address

**4502 Freedom Way
Weirton, WV 26062**

Save trees. Go green!

Download Google Maps for mobile

Text maps to 466453



ATTACHMENT B
TITLE V PERMIT RENEWAL
Plant ID No. 03-54-00900054

Roll Coater, Inc.
Weirton
Permit No. R30-00900054-2003

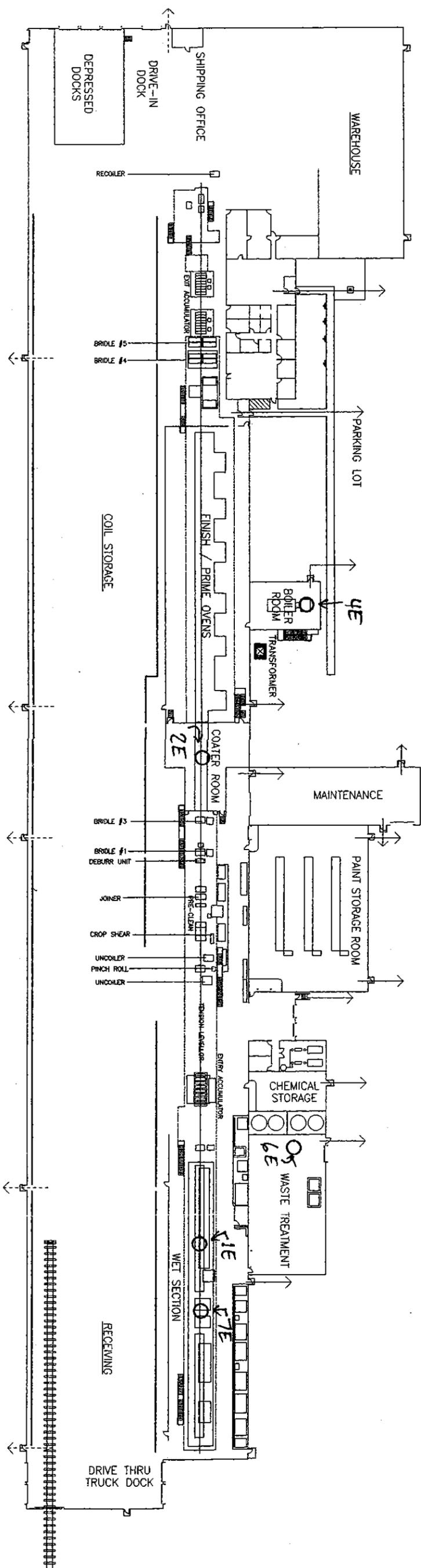
PLOT PLAN



ROLLCOATER FLOOR PLAN EVACUATION ROUTES

EVACUATION ASSEMBLY POINT
AT FIRE HYDRANT

PRIMARY EVACUATION ROUTE ———→
SECONDARY EVACUATION ROUTE - - - - ->



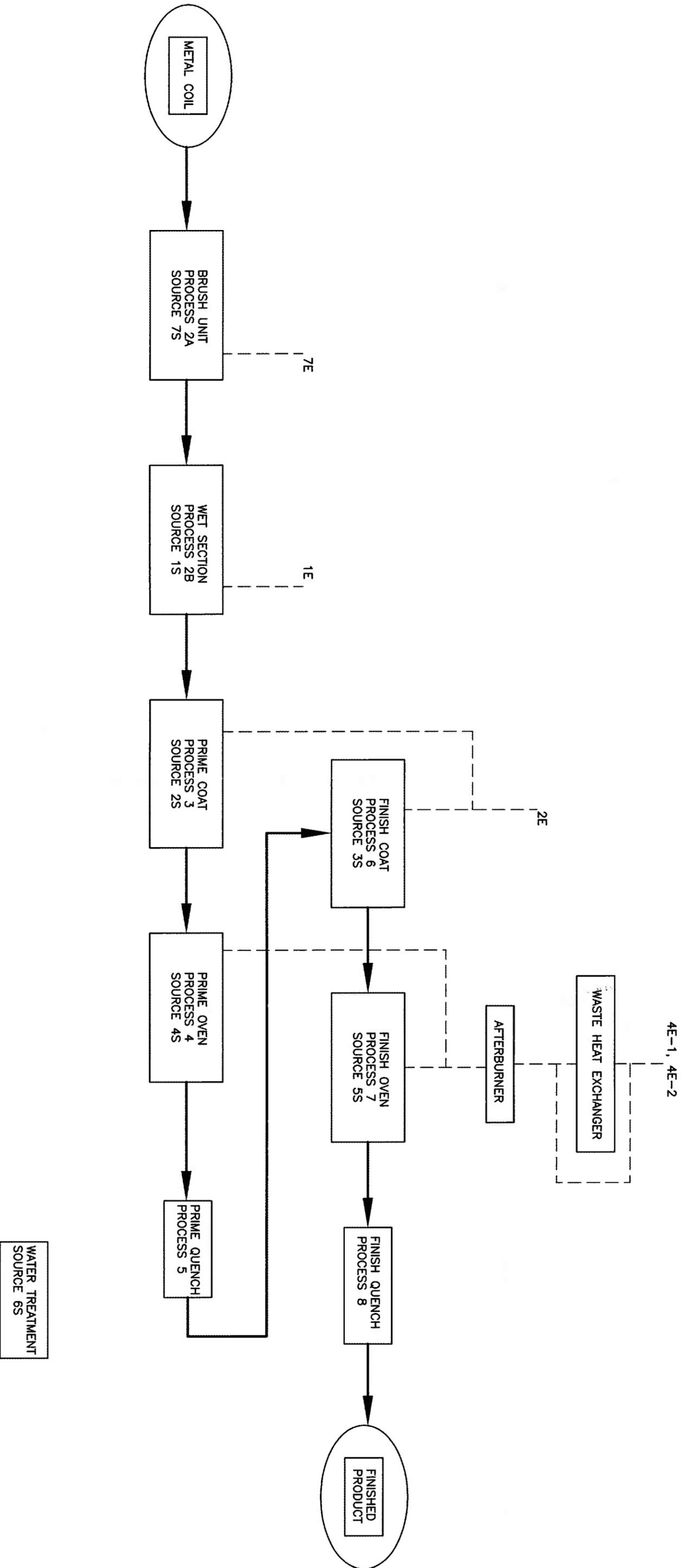
SCALE 1" = 70 FT.

FOR APPROVAL:		TO SHOP:	
R & R APPROVAL:		AS BUILT:	
JOB NAME: EVACUATION FLOOR PLAN		DRAWN BY: M.M.	
LOCATION: WELTON ROLL COATER		CHECKED BY: BA	
CONTRACTOR:		DATE: 3/25/98	
DESCRIPTION: FLOOR PLAN		RC DRAW 0001	
		SHEET	
		REV. 2 - 4/24/00	
		TB_NO	

ATTACHMENT C
TITLE V PERMIT RENEWAL
Plant ID No. 03-54-00900054

Roll Coater, Inc.
Weirton
Permit No. R30-00900054-2003

PROCESS FLOW DIAGRAM



WATER TREATMENT
SOURCE 6S

		<p>Civil & Environmental Consultants, Inc.</p> <p>333 Baldwin Road, Pittsburgh, PA 15205-9702 (412) 429-2324 • (800) 365-2324</p>	
Cincinnati, OH Columbus, OH Indianapolis, IN Nashville, TN	Chicago, IL Evanston, PA St. Louis, MO Detroit, MI	PROJECT NO: 070-550	FIGURE NO: 1
DRAWN BY: SPS	CHKD BY: KAM	DWG SCALE: N.T.S.	LAST EDIT DATE: 11/28/07
QUALITY MANAGER APPROVAL:		WEIRTON, WEST VIRGINIA	

ATTACHMENT D
TITLE V PERMIT RENEWAL
Plant ID No. 03-54-00900054

Roll Coater, Inc.
Weirton
Permit No. R30-00900054-2003

EMISSION UNITS TABLE

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

Emission Unit ID ¹	Emission Point ID ¹	Emission Unit Description	Year Installed/ Modified	Design Capacity	Control Device ¹
1s (1e)	001-01	WET SECTION PROCESS	1996	79.1 tons/hr (158,232 lb/hr) metal coil	NONE
2s (2e)	002-01	PRIME COATING	1996	180 gal/hr solvent and 79.1 tons/hr metal coil	NONE
3s (2e)	002-02	FINISH COATING	1996	180 gal/hr solvent and 80.1 tons/hr coated metal coil	NONE
4s (4e-1 & 2)	003-01	PRIME OVEN	1996	180 gal/hr solvent and 80.1 tons/hr coated metal coil	4e-1&2
5s (4e-1 & 2)	003-02	FINISH OVEN	1996	180 gal/hr solvent and 80.1 tons/hr coated metal coil	4e-1&2
4e-1	003-03	AFTERBURNER	1996	41 MMBtu/HR	NONE
4e-2	003-09	WASTE HEAT BOILER	1996	41 MMBtu/HR	NONE
6s (6e)	004-01	WASTEWATER TREATMENT	1996	40 GPM 57,600 GPD	NONE
7s (7e)	005-01	BRUSH UNIT	1996	3,300 ft ² /min/side 79.1 tons/hr metal coil	NONE

¹For 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.

ATTACHMENT E
TITLE V PERMIT RENEWAL
Plant ID No. 03-54-00900054

Roll Coater, Inc.
Weirton
Permit No. R30-00900054-2003

EMISSION UNIT FORMS

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 1s	Emission unit name: WET SECTION PROCESS	List any control devices associated with this emission unit: NONE
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
This is a 6-stage chemical treatment process where metal coil is cleaned, treated, and rinsed using mineral acids, water, and other materials. Each treatment stage is ducted to a ventilation fan that discharges fugitive emissions to the outdoor atmosphere.

Manufacturer: CUSTOM	Model number: NONE	Serial number: NONE
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Construction date: Spring 1996	Installation date: 08/01/1996	Modification date(s): NA
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
79.1 TONS METAL COIL PROCESSES PER HOUR

Maximum Hourly Throughput: 79.1 TONS METAL COIL	Maximum Annual Throughput: 693,000 TONS METAL COIL	Maximum Operating Schedule: 24 HRS/DAY, 7 DAYS/WK, 52 WKS/YR
---	--	--

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, is it? <input type="checkbox"/> Indirect Fired <input type="checkbox"/> 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
NA			

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0	0
Nitrogen Oxides (NO _x)	0	0
Lead (Pb)	0	0
Particulate Matter (PM _{2.5})	0	0
Particulate Matter (PM ₁₀)	0	0
Total Particulate Matter (TSP)	0	0
Sulfur Dioxide (SO ₂)	0	0
Volatile Organic Compounds (VOC)	0	0
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
CHROMIUM COMPOUNDS	0.016	0.070
HYDROGEN CHLORIDE	0.039	0.171
HYDROGEN FLUORIDE	0.114	0.50
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
PHOSPHORIC ACID	0.057	0.25
NITRIC ACID	0.163	0.71
<p>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.).</p> <p>BASED ON THE PERMIT LIMITS AND AN ASSUMED 8,760 HRS/YR OPERATION.</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). 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.

1. 45CSR13, R13-1910B, CONDITION 4.1.1: EMISSION LIMITS: CHROMIUM (0.016 LB/HR AND 0.070 TPY), HYDROGEN CHLORIDE (0.039 LB/HR AND 0.00084 TPY), HYDROGEN FLUORIDE (0.114 LB/HR AND 0.50 TPY), NITRIC ACID (0.163 LB/HR AND 0.71 TPY), PHOSPHORIC ACID (0.057 LB/HR AND 0.25 TPY).
2. 45CSR7-3.1, R13-1910B, CONDITION 4.1.2: OPACITY LIMIT OF 20% EXCEPT PER NOTED PER 45CSR7.
3. 45CSR7-3.2, R13-1910B, CONDITION 4.1.3: OPACITY < 40% IS PERMITTED FOR UP TO 5 MINUTES DURING ANY 60-MINUTE PERIOD.
4. 45CSR7-4.2, R13-1910B, CONDITION 4.1.4: MINERAL ACIDS SHALL NOT BE RELEASED IN EXCESS OF THE QUANTITIES IN TABLE 45-7B OD 45CSR7. COMPLIANCE SHALL BE DEMONSTRATED THROUGH COMPLIANCE WITH THE HOURLY MINERAL ACID LIMITS OF SECTION 4.1.1.
5. 45CSR7-4.2, R13-1910B, CONDITION 4.1.5: CIRCUMVENTION OF 45CSR7 THROUGH ADDITION OF GAS TO EXHAUST FOR PURPOSE OF REDUCING GAS CONCENTRATIONS IS PROHIBITED.

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.)

1. WEEKLY VISUAL EMISSION CHECKS OF EACH EMISSION POINT SUBJECT TO AN OPACITY LIMIT. CHECKS WILL BE CONDUCTED DURING PERIODS OF NORMAL OPERATION USING PROCEDURES PER 40CFR60, APPENDIX A, METHOD 22. IF VISUAL EMISSIONS ARE DETECTED, A METHOD 9 EVALUATION WILL BE CONDUCTED WITHIN 24 HOURS.
2. COMPLIANCE WITH EMISSION LIMITS SHALL BE DEMONSTRATED BY:
 - a. SOURCE TESTING FOR CHROMIUM, HYDROGEN CHLORIDE, HYDROGEN FLUORIDE, NITRIC ACID, AND PHOSPHORIC ACID IN ACCORDANCE WITH 45CSR7A ONCE EACH PERMIT RENEWAL.
 - b. TEST METHODS AS SPECIFIED IN CONDITION 4.3.1 SHALL BE USED.
3. MAINTAIN RECORDS OF VISUAL EMISSION CHECKS FOR NO LESS THAN 5 YEARS.
4. SUBMIT RECORDS FROM STACK TESTS TO THE DIRECTOR WITHIN 60 DAYS FROM THE DATE OF COMPLETING THE TESTING.

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

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

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number:

2s

Emission unit name:

PRIME COATING

List any control devices associated with this emission unit: NONE

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

Prime coating consists of a shuttle-type coater with two application heads for the top of the metal strip and a shuttle-type coater with two application heads for the bottom of the metal strip. Primer is pumped from 55-gallon drums into a paint pan where it is picked up by a pickup roller, metered, and transferred to the metal strip. The process is enclosed in a room. Air intakes for the prime oven have intakes which remove VOCs and pass them through the ovens to the afterburner where they are destroyed.

Manufacturer:

GFG

Model number:

NONE

Serial number:

NONE

Construction date:

Spring 1996

Installation date:

08/01/1996

Modification date(s):

NA

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

79.1 TONS OF BARE METAL COIL PER HOUR AND 180 GALLONS SOLVENT LOAD PER HOUR

Maximum Hourly Throughput:

79.1 TONS METAL STRIP and
180 GAL/HR SOLVENT

Maximum Annual Throughput:

693,000 TONS METAL STRIP
1.577 MMGAL SOLVENT

Maximum Operating Schedule:

24 HRS/DAY, 7 DAYS/WK, 52
WKS/YR

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? ___ Yes 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
NA			

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0	0
Nitrogen Oxides (NO _x)	0	0
Lead (Pb)	0	0
Particulate Matter (PM _{2.5})	0	0
Particulate Matter (PM ₁₀)	0	0
Total Particulate Matter (TSP)	0	0
Sulfur Dioxide (SO ₂)	0	0
Volatile Organic Compounds (VOC)	10	43.8
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
FORMALDEHYDE	0.02	0.09
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>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.).</p> <p>BASED ON THE PERMIT LIMITS AND AN ASSUMED 8,760 HRS/YR OPERATION.</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). 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.

1. 45CSR13, R13-1910B, CONDITION 5.1.1: FORMALDEHYDE EMISSION LIMITS OF 0.04 LB/HR AND 0.18 TPY AND TOTAL VOC EMISSION LIMITS OF 20.0 LB/HR AND 87.6 TPY
2. 45CSR13, R13-1910B, CONDITION 5.1.2: USE COATINGS LISTED PER MSDS SUBMITTED WITH THE PERMIT APPLICATION R13-1910 OR SUBMITTED AS NEEDED FOR APPROVAL.
3. 45CSR13, R13-1910B, CONDITION 5.1.3: COATING INFORMATION WITH REQUIRED CONTENT MAY BE SUBMITTED INSTEAD OF MSDS.
4. 40CFR60.462(2), SUBPART TT, R13-1910B, CONDITION 5.1.4: EMISSION LIMIT OF 1.15 LB VOC PER GALLON OF COATING SOLIDS PER CALENDAR MONTH.

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.)

1. MSDS SHALL BE MAINTAINED ON SITE AND AVAILABLE FOR INSPECTION.
2. STACK TESTING SHALL BE PERFORMED TO DETERMINE VOC EMISSIONS FROM EMISSION POINT 2E USING METHODS 1, 2, 3, 4, 24, AND 25 OF 40 CFR 60, APPENDIX A. TESTING SHALL OCCUR ONCE DURING EACH PERMIT RENEWAL.
3. RECORDS SHALL BE MAINTAINED AS FOLLOWS:
 - a. MONTHLY USAGE OF EACH COATING AND SOLVENT WITH VOC CONTENT OF EACH
 - b. HOURS OF OPERATION EACH MONTH
 - c. TON PER MONTH OF VOCS EMITTED FROM THE COATER PROCESS
 - d. AVERAGE POUNDS PER HOUR OF VOCS EMITTED FROM THE COATING PROCESS
4. MAINTAIN RECORDS OF FORMALDEHYDE EMISSIONS. ESTIMATE EMISSIONS USING A MAXIMUM PERCENTAGE OF FORMALDEHYDE BY WEIGHT OF 0.075. MAINTAIN AND UPDATE ESTIMATES ON A MONTHLY BASIS.
5. A RESPONSIBLE OFFICIAL WILL CERTIFY AND SUBMIT RECORDS TO THE DIRECTOR NO LATER THAN 15 DAYS AFTER THE END OF EACH QUARTER.
6. SUBMIT RESULTS OF STACK TESTS TO THE DIRECTOR WITHIN 60 DAYS FROM THE DATE TESTING IS COMPLETED.

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

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

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 3s	Emission unit name: FINISH COATING	List any control devices associated with this emission unit: NONE
---------------------------------------	--	--

Provide a description of the emission unit (type, method of operation, design parameters, etc.):
 Finish coating consists of two independent coater heads with applicator, pickup, and metering rolls for the top of the strip and a shuttle-type coater with two application heads for the bottom of the strip. Finish paint is pumped from 55-gallon drums into a paint pan where it is picked up by a pickup roll and transferred to the metal strip. The process is enclosed in a room. Air intakes for the finish oven have intakes which remove VOCs and pass them through the ovens to the afterburner where they are destroyed.

Manufacturer: GFG	Model number: NONE	Serial number: NONE
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Construction date: Spring 1996	Installation date: 08/01/1996	Modification date(s): NA
--	---	------------------------------------

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
 80.1 TONS COATED METAL STRIP PER HOUR AND 180 GALLONS SOLVENT LOAD PER HOUR

Maximum Hourly Throughput: 80.1 TONS COATED METAL STRIP, 180 GAL/HR SOLVENT	Maximum Annual Throughput: 702,000 TONS METAL STRIP 1.577 MMGAL SOLVENT	Maximum Operating Schedule: 24 HRS/DAY, 7 DAYS/WK, 52 WKS/YR
---	--	--

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, is it? <input type="checkbox"/> Indirect Fired <input type="checkbox"/> 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
NA			

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0	0
Nitrogen Oxides (NO _x)	0	0
Lead (Pb)	0	0
Particulate Matter (PM _{2.5})	0	0
Particulate Matter (PM ₁₀)	0	0
Total Particulate Matter (TSP)	0	0
Sulfur Dioxide (SO ₂)	0	0
Volatile Organic Compounds (VOC)	10	43.8
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
FORMALDEHYDE	0.02	0.09
Regulated Pollutants other than Criteria and HAP	Potential Emissions	
	PPH	TPY
<p>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.).</p> <p>BASED ON THE PERMIT LIMITS AND AN ASSUMED 8,760 HRS/YR OPERATION.</p>		

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). 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.

1. 45CSR13, R13-1910B, CONDITION 5.1.1: FORMALDEHYDE EMISSION LIMITS OF 0.04 LB/HR AND 0.18 TPY AND TOTAL VOC EMISSION LIMITS OF 20.0 LB/HR AND 87.6 TPY
2. 45CSR13, R13-1910B, CONDITION 5.1.2: USE COATINGS LISTED PER MSDS SUBMITTED WITH THE PERMIT APPLICATION R13-1910 OR SUBMITTED AS NEEDED FOR APPROVAL.
3. 45CSR13, R13-1910B, CONDITION 5.1.3: COATING INFORMATION WITH REQUIRED CONTENT MAY BE SUBMITTED INSTEAD OF MSDS.
4. 40CFR60.462(2), SUBPART TT, R13-1910B, CONDITION 5.1.4: EMISSION LIMIT OF 1.15 LB VOC PER GALLON OF COATING SOLIDS PER CALENDAR MONTH.

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.)

1. MSDS SHALL BE MAINTAINED ON SITE AND AVAILABLE FOR INSPECTION.
2. STACK TESTING SHALL BE PERFORMED TO DETERMINE VOC EMISSIONS FROM EMISSION POINT 2E USING METHODS 1, 2, 3, 4, 24, AND 25 OF 40 CFR 60, APPENDIX A. TESTING SHALL OCCUR ONCE DURING EACH PERMIT RENEWAL.
3. RECORDS SHALL BE MAINTAINED AS FOLLOWS:
 - a. MONTHLY USAGE OF EACH COATING AND SOLVENT WITH VOC CONTENT OF EACH
 - b. HOURS OF OPERATION EACH MONTH
 - c. TON PER MONTH OF VOCS EMITTED FROM THE COATER PROCESS
 - d. AVERAGE POUNDS PER HOUR OF VOCS EMITTED FROM THE COATING PROCESS
4. MAINTAIN RECORDS OF FORMALDEHYDE EMISSIONS. ESTIMATE EMISSIONS USING A MAXIMUM PERCENTAGE OF FORMALDEHYDE BY WEIGHT OF 0.075. MAINTAIN AND UPDATE ESTIMATES ON A MONTHLY BASIS.
5. A RESPONSIBLE OFFICIAL WILL CERTIFY AND SUBMIT RECORDS TO THE DIRECTOR NO LATER THAN 15 DAYS AFTER THE END OF EACH QUARTER.
6. SUBMIT RESULTS OF STACK TESTS TO THE DIRECTOR WITHIN 60 DAYS FROM THE DATE TESTING IS COMPLETED.

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

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

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 4s	Emission unit name: PRIME OVEN	List any control devices associated with this emission unit: AFTERBURNER (4e-1)
---------------------------------------	--	---

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

The prime oven cures and dries the surface coat on the metal strip through a combination of radiant and convection heat. This is an insulated enclosure with ducts connecting the coater room and the entry and the quench at the exit. VOCs present in the enclosure are exhausted, mixed with the finish oven exhaust, and ducted to the afterburner for destruction.

Manufacturer: PROENCO SYSTEMS	Model number: NONE	Serial number: NONE
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Construction date: Spring 1996	Installation date: 08/01/1996	Modification date(s): NA
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
80 TONS COATED METAL COIL PER HOUR AND 180 GALLONS SOLVENT LOAD PER HOUR

Maximum Hourly Throughput: 80 TONS COATED METAL STRIP 180 GAL/HR SOLVENT	Maximum Annual Throughput: 702,000 TONS COATED STRIP 1.577 MMGAL SOLVENT	Maximum Operating Schedule: 24 HRS/DAY, 7 DAYS/WK, 52 WKS/YR
---	---	---

Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input checked="" type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
--	---

Maximum design heat input and/or maximum horsepower rating: 41 MMBtu/hr	Type and Btu/hr rating of burners: MAXON Model 400 OVENPAK burners: 2 @ 6 MMBtu/hr and 4 @ 5 MMBtu/hr, plus one 9 MMBtu/hr pre-heater burner.
---	--

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.
NATURAL GAS (LHV 950 Btu/scf) ~ 43,200 scf/hr and 378 MMscf/yr

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	2,000 grains/MMscf	NIL	950-1050/scf

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	7	30.65
Nitrogen Oxides (NO _x)	7.8	34.15
Lead (Pb)	0	0
Particulate Matter (PM _{2.5})	0.47	2.05
Particulate Matter (PM ₁₀)	0.47	2.05
Total Particulate Matter (TSP)	0.47	2.05
Sulfur Dioxide (SO ₂)	0.138	0.6
Volatile Organic Compounds (VOC)	16.2	70.95
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
FORMALDEHYDE	0.03	0.13
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.).

BASED ON THE PERMIT LIMITS AND AN ASSUMED 8,760 HRS/YR OPERATION.
 PM2.5 ASSUMED TO BE EQUAL TO PM10 AND TSP FOR NATURAL GAS COMBUSTION.
 ASSUMES 98.5% MINIMUM AFTERBURNER CONTROL EFFICIENCY.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). 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.

1. 45CSR13, R13-1910B, CONDITION 6.1.1: EMISSION LIMITS FOR THE COMBINED PRIME AND FINISH OVENS (4E) ARE: CARBON MONOXIDE (14.0 LB/HR & 61.3 TPY), FORMALDEHYDE (0.060 LB/HR & 0.26 TPY), NITROGEN OXIDES (15.6 LB/HR & 68.3 TPY), PARTICULATE MATTER (0.94 LB/HR & 4.1 TPY), SULFUR DIOXIDE (0.275 LB/HR & 1.20 TPY), TOTAL VOC (32.4 LB/HR & 141.9 TPY).
2. 45CSR13, R13-1910B, CONDITION 6.1.2: NO MORE THAN 60% OF THE EFFLUENT COMBUSTION STREAM FROM THE AFTERBURNER SHALL BE DIVERTED FROM EMISSION POINT 4E TO THE WASTE HEAT BOILER.
3. 45CSR13, R13-1910B, CONDITION 6.1.3: THE AFTERBURNER USED TO CONTROL EMISSIONS FROM THE PRIME AND FINISH OVENS SHALL BE AT LEAST 98.5% EFFICIENT IN DESTROYING VOCS.
4. 45CSR13, R13-1910B, CONDITION 6.1.4: THE FINISH OVEN SHALL BE OPERATED TO BE AT LEAST 50.0% EFFICIENT IN DESTROYING VOCS.
6. 45CSR7-3.1, R13-1910B, CONDITION 6.1.5: OPACITY LIMIT OF 20% EXCEPT PER 6.1.6
7. 45CSR7-3.2, R13-1910B, CONDITION 6.1.6: OPACITY < 40% IS PERMITTED FOR UP TO 5 MINUTES DURING ANY 60-MINUTE PERIOD.
8. 45CSR7-4.1, R13-1910B, CONDITION 6.1.8: PARTICULATE MATTER EMISSIONS MAY NOT EXCEED LIMITS SET FOR THE APPROPRIATE SOURCE TYPE IN TABLE 45-71 OF 45CSR7. COMPLIANCE WITH 45CSR7-4.1 HOURLY LIMITS FOR THIS EMISSION GROUP SHALL BE DEMONSTRATED THROUGH COMPLIANCE WITH THE HOURLY LIMITS SET IN CONDITION 6.1.1.
9. 45CSR7-4.2, R13-1910B, CONDITION 6.1.7: CIRCUMVENTION OF 45CSR7 THROUGH ADDITION OF GAS TO EXHAUST FOR PURPOSE OF REDUCING GAS CONCENTRATIONS IS PROHIBITED.
10. 45CSR7-5.1, R13-1910B, CONDITION 6.1.9: FUGITIVE PARTICULATE EMISSIONS SHALL BE LIMITED THROUGH A SYSTEM INSTALLED, MAINTAINED, AND OPERATED TO ENSURE THE LOWEST EMISSIONS REASONABLY ACHIEVABLE.
11. 45CSR7-10.3, R13-1910B, CONDITION 6.1.10: MAINTENANCE OPERATIONS SHALL BE EXEMPT FROM SECTION 4 OF 45CSR7 PROVIDED SUCH OPERATIONS ARE CONDUCTED IN A MANNER CONSISTENT WITH GOOD AIR POLLUTION CONTROL PRACTICES.
12. 45CSR10-3.7, R13-1910B, CONDITION 6.1.11: WASTE HEAT BOILER FUEL COMBUSTION EMISSIONS MAY NOT CAUSE SULFUR DIOXIDE EMISSIONS IN EXCESS OF 2.2 LB/MMBTU HEAT INPUT PER HOUR.
13. 45CSR10-4.1, R13-1910B, CONDITION 6.1.12: EMISSIONS FROM ANY SOURCE OPERATION SHALL NOT EXCEED AN IN-STACK SULFUR DIOXIDE CONCENTRATION OF 2,000 PPMV.
14. 45CSR13, R13-1910B, CONDITION 6.1.13: TO THE EXTENT PRACTICABLE, INSTALL, MAINTAIN, AND OPERATE ALL POLLUTION CONTROL EQUIPMENT (I.E., AFTERBURNER) AND ASSOCIATED MONITORING EQUIPMENT IN A MANNER CONSISTENT WITH SAFETY AND GOOD AIR POLLUTION CONTROL PRACTICES FOR MINIMIZING EMISSIONS OR COMPLY WITH ANY MORE STRINGENT APPLICABLE LIMITS.

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.)

1. 45CSR13, R13-1910, CONDITION 6.2.1: WEEKLY VISUAL EMISSION CHECKS OF EACH EMISSION POINT SUBJECT TO AN OPACITY LIMIT. CHECKS WILL BE CONDUCTED DURING PERIODS OF NORMAL OPERATION USING PROCEDURES PER 40CFR60, APPENDIX A, METHOD 22. IF VISUAL EMISSIONS ARE DETECTED, A METHOD 9 EVALUATION WILL BE CONDUCTED WITHIN 24 HOURS.
2. 40CFR60.464(C) AND 60.465, SUBPART TT AND 45CSR13, R13-1910, CONDITION 6.2.2: INSTALL, CALIBRATE, OPERATE, AND MAINTAIN A DEVICE FOR CONTINUOUS RECORDING OF TEMPERATURE OF ANY EFFLUENT GASES INCINERATED TO ACHIEVE 98.5% EFFICIENCY. SPECIFIC ACCURACY REQUIREMENTS APPLY PER THIS CONDITION. ALL PERIODS IN EXCESS OF 3 HOURS DURING WHICH THE AVERAGE TEMPERATURE IN THE AFTERBURNER REMAINS MORE THAN 28°C (50°F) BELOW THE TEMPERATURE AT WHICH COMPLIANCE WAS DEMONSTRATED DURING THE MOST RECENT MEASUREMENT SHALL BE RECORDED AND REPORTED EVERY CALENDAR MONTH (OR SEMIANNUALLY IN NO SUCH EVENTS OCCUR IN A QUARTER).
3. 45CSR13, R13-1910B, CONDITION 6.2.3: UPON DEMONSTRATION OF COMPLIANCE WITH NOX AND CO LIMITS PER TESTING REQUIREMENTS, CONTINUAL COMPLIANCE SHALL BE DEMONSTRATED THROUGH DOCUMENTATION THAT NATURAL GAS IS THE ONLY FUEL COMBUSTED IN THE PRIME OVEN, FINISH OVEN, AND AFTERBURNER.
4. 45CSR13, R13-1910B, CONDITION 6.2.4: CONTINUAL COMPLIANCE WITH THE PARTICULATE MATTER AND SULFUR DIOXIDE LIMITS SHALL BE DEMONSTRATED THROUGH DOCUMENTATION THAT NATURAL GAS IS THE ONLY FUEL COMBUSTED IN THE PRIME OVEN, FINISH OVEN, AND AFTERBURNER.
5. 45CSR13, R13-1910B, CONDITION 6.3.1: STACK TESTING WILL BE PERFORMED TO DETERMINE CO AND NOX EMISSIONS FROM POINT 4E PER METHODS 10 AND 7 (40CFR60, APPENDIX A) ONCE PER PERMIT TERM.
6. 45CSR13, R13-1910B, CONDITION 6.3.2: VOC TESTING WILL BE PERFORMED TO DETERMINE CO AND NOX EMISSIONS FROM POINT 4E PER METHODS 10 AND 7 (40CFR60, APPENDIX A) ONCE PER PERMIT TERM.
7. 45CSR13, R13-1910B, CONDITION 6.3.3: TESTING OF THE WASTE HEAT BOILER EXHAUST SHALL BE CONDUCTED WHEN THE MAXIMUM 60% OF AFTERBURNER EXHAUST IS DIRECTED TO THE BOILER.
8. 45CSR13, R13-1910B, CONDITION 6.4.1: MAINTAIN RECORDS OF FORMALDEHYDE EMISSIONS AND CALCUALTE EMISSIONS USING A MAXIMUM PERCENTAGE BY WEIGHT OF 0.075. UPDATE EMISSION ESTIMATES ON A MONTHLY BASIS.
9. 45CSR13, R13-1910B, CONDITION 6.4.2: DEMONSTRATE COMPLIANCE WITH THE SO2 LIMIT BY MAINTAINING RECORDS OF THE HOURS OF OPERATION AND THE QUANTITY AND QUALITY OF FUEL COMBUSTED EACH MONTH IN THE PRIME AND FINISH OVENS AND THE AFTERBURNER.
10. 40 CFR60.464(a), SUBPART TT AND 45CSR13, R13-1910B, CONDITION 6.4.3: COMPUTE AND RECORD THE AVERAGE VOC CONTENT OF COATINGS APPLIED DURING EACH CALENDAR MONTH ACCORDING TO EQUATIONS PROVIDED IN 40CFR60.463, SUBPART TT.
11. 45CSR13, R13-1910B, CONDITIONS 6.2.1 AND 6.4.4: MAINTAIN RECORDS OF THE VISUAL EMISSION CHECK REQUIRED IN SECTION 6.2.1. FOR A PERIOD NO LESS THAN 5 YEARS.
12. 45CSR13, R13-1910B, CONDITION 6.4.5: MAINTAIN ACCURATE RECORDS OF ALL REQUIRED POLLUTION CONTROL EQUIPMENT INSPECTIONS AND/OR PREVENTATIVE MAINTENANCE PROCEDURES FOR THE AFTERBURNER.

Are you in compliance with all applicable requirements for this emission unit? 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.)

13. 45CSR13, R13-1910B, CONDITION 6.4.6: MAINTAIN RECORDS OF THE OCCURRENCE AND DURATION OF ANY MALFUNCTION OR OPERATIONAL SHUTDOWN OR THE AFTERBURNER DURING WHICH EXCESS EMISSIONS OCCUR. RECORD: THE EQUIPMENT, STEPS TAKEN TO MINIMIZE EMISSIONS DURING THE EVENT, THE EVENT DURATION, THE ESTIMATED INCREASE IN EMISSIONS DURING THE EVENT. IF THE EVENT IS CAUSED BY A MALFUNCTION, INCLUDE: CAUSE OF THE MALFUNCTION, STEPS TAKEN TO CORRECT THE MALFUNCTION, ANY CHANGES OR MODIFICATIONS TO EQUIPMENT OR PROCEDURES THAT WOULD HELP PREVENT FUTURE RECURRENCES OF THE MALFUNCTION.
14. 40CFR60.48c, SUBPART Dc AND 45CSR13, R13-1910B, CONDITION 6.5.1: REPORTS REQUIRED BY SECTION 6.4.3 SHALL BE SUBMITTED EVERY SIX MONTHS BY THE 30TH DAY FOLLOWING THE END OF THE REPORTING PERIOD.
15. 40CFR60.465, SUBPART TT AND 45CSR13, R13-1910B, CONDITION 6.5.2: EACH REPORT REQUIRED AT THE PERMIT RENEWAL WILL INCLUDE: THE WEIGHTED AVERAGE OF THE VOC CONTENT OF COATINGS USED DURING A PERIOD OF ONE CALENDAR MONTH, THE OVERALL VOC DESTRUCTION RATE USED TO ATTAIN COMPLIANCE WITH 40CFR60.462(a)(2), SUBPART TT, AND THE COMBUSTION TEMPERATURE OF THE AFTERBURNER USED TO ATTAIN COMPLIANCE WITH 40CFR60.462(A)(2), SUBPART TT.

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

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

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 5s	Emission unit name: FINISH OVEN	List any control devices associated with this emission unit: AFTERBURNER (4e-1)
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):

The finish oven cures and dries the surface coat on the metal strip through a combination of radiant and convection heat. This is an insulated enclosure with ducts connecting the coater room and the entry and the quench at the exit. VOCs present in the enclosure are exhausted, mixed with the prime oven exhaust, and ducted to the afterburner for destruction.

Manufacturer: PROENCO SYSTEMS	Model number: NONE	Serial number: NONE
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Construction date: Spring 1996	Installation date: 08/01/1996	Modification date(s): NA
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
80 TONS COATED METAL COIL PER HOUR AND 180 GALLONS SOLVENT LOAD PER HOUR

Maximum Hourly Throughput: 80 TONS COATED METAL STRIP 180 GAL/HR SOLVENT	Maximum Annual Throughput: 702,000 TONS COATED STRIP 1.577 MMGAL SOLVENT	Maximum Operating Schedule: 24 HRS/DAY, 7 DAYS/WK, 52 WKS/YR
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Fuel Usage Data (fill out all applicable fields)

Does this emission unit combust fuel? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, is it? <input checked="" type="checkbox"/> Indirect Fired <input type="checkbox"/> Direct Fired
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Maximum design heat input and/or maximum horsepower rating: 41 MMBtu/hr	Type and Btu/hr rating of burners: MAXON Model 400 OVENPAK burners: 2 @ 6 MMBtu/hr and 4 @ 5 MMBtu/hr, plus one 9 MMBtu/hr pre-heater burner.
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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.
NATURAL GAS (LHV 950 Btu/scf) ~ 43,200 scf/hr and 378 MMscf/yr

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	2,000 grains/MMscf	NIL	950-1050/scf

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	7	30.65
Nitrogen Oxides (NO _x)	7.8	34.15
Lead (Pb)	0	0
Particulate Matter (PM _{2.5})	0.47	2.05
Particulate Matter (PM ₁₀)	0.47	2.05
Total Particulate Matter (TSP)	0.47	2.05
Sulfur Dioxide (SO ₂)	0.138	0.6
Volatile Organic Compounds (VOC)	16.2	70.95
Hazardous Air Pollutants	Potential Emissions	
	PPH	TPY
FORMALDEHYDE	0.03	0.13
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.).

BASED ON THE PERMIT LIMITS AND AN ASSUMED 8,760 HRS/YR OPERATION.
 PM2.5 ASSUMED TO BE EQUAL TO PM10 AND TSP FOR NATURAL GAS COMBUSTION.
 ASSUMES 98.5% MINIMUM AFTERBURNER CONTROL EFFICIENCY.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). 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.

1. 45CSR13, R13-1910B, CONDITION 6.1.1: EMISSION LIMITS FOR THE COMBINED PRIME AND FINISH OVENS (4E) ARE: CARBON MONOXIDE (14.0 LB/HR & 61.3 TPY), FORMALDEHYDE (0.060 LB/HR & 0.26 TPY), NITROGEN OXIDES (15.6 LB/HR & 68.3 TPY), PARTICULATE MATTER (0.94 LB/HR & 4.1 TPY), SULFUR DIOXIDE (0.275 LB/HR & 1.20 TPY), TOTAL VOC (32.4 LB/HR & 141.9 TPY).
2. 45CSR13, R13-1910B, CONDITION 6.1.2: NO MORE THAN 60% OF THE EFFLUENT COMBUSTION STREAM FROM THE AFTERBURNER SHALL BE DIVERTED FROM EMISSION POINT 4E TO THE WASTE HEAT BOILER.
3. 45CSR13, R13-1910B, CONDITION 6.1.3: THE AFTERBURNER USED TO CONTROL EMISSIONS FROM THE PRIME AND FINISH OVENS SHALL BE AT LEAST 98.5% EFFICIENT IN DESTROYING VOCS.
4. 45CSR13, R13-1910B, CONDITION 6.1.4: THE FINISH OVEN SHALL BE OPERATED TO BE AT LEAST 50.0% EFFICIENT IN DESTROYING VOCS.
5. 45CSR7-3.1, R13-1910B, CONDITION 6.1.5: OPACITY LIMIT OF 20% EXCEPT PER 6.1.6
6. 45CSR7-3.2, R13-1910B, CONDITION 6.1.6: OPACITY < 40% IS PERMITTED FOR UP TO 5 MINUTES DURING ANY 60-MINUTE PERIOD.
7. 45CSR7-4.1, R13-1910B, CONDITION 6.1.8: PARTICULATE MATTER EMISSIONS MAY NOT EXCEED LIMITS SET FOR THE APPROPRIATE SOURCE TYPE IN TABLE 45-71 OF 45CSR7. COMPLIANCE WITH 45CSR7-4.1 HOURLY LIMITS FOR THIS EMISSION GROUP SHALL BE DEMONSTRATED THROUGH COMPLIANCE WITH THE HOURLY LIMITS SET IN CONDITION 6.1.1.
8. 45CSR7-4.2, R13-1910B, CONDITION 6.1.7: CIRCUMVENTION OF 45CSR7 THROUGH ADDITION OF GAS TO EXHAUST FOR PURPOSE OF REDUCING GAS CONCENTRATIONS IS PROHIBITED.
9. 45CSR7-5.1, R13-1910B, CONDITION 6.1.9: FUGITIVE PARTICULATE EMISSIONS SHALL BE LIMITED THROUGH A SYSTEM INSTALLED, MAINTAINED, AND OPERATED TO ENSURE THE LOWEST EMISSIONS REASONABLY ACHIEVABLE.
10. 45CSR7-10.3, R13-1910B, CONDITION 6.1.10: MAINTENANCE OPERATIONS SHALL BE EXEMPT FROM SECTION 4 OF 45CSR7 PROVIDED SUCH OPERATIONS ARE CONDUCTED IN A MANNER CONSISTENT WITH GOOD AIR POLLUTION CONTROL PRACTICES.
11. 45CSR10-3.7, R13-1910B, CONDITION 6.1.11: WASTE HEAT BOILER FUEL COMBUSTION EMISSIONS MAY NOT CAUSE SULFUR DIOXIDE EMISSIONS IN EXCESS OF 2.2 LB/MMBTU HEAT INPUT PER HOUR.
12. 45CSR10-4.1, R13-1910B, CONDITION 6.1.12: EMISSIONS FROM ANY SOURCE OPERATION SHALL NOT EXCEED AN IN-STACK SULFUR DIOXIDE CONCENTRATION OF 2,000 PPMV.
13. 45CSR13, R13-1910B, CONDITION 6.1.13: TO THE EXTENT PRACTICABLE, INSTALL, MAINTAIN, AND OPERATE ALL POLLUTION CONTROL EQUIPMENT (I.E., AFTERBURNER) AND ASSOCIATED MONITORING EQUIPMENT IN A MANNER CONSISTENT WITH SAFETY AND GOOD AIR POLLUTION CONTROL PRACTICES FOR MINIMIZING EMISSIONS OR COMPLY WITH ANY MORE STRINGENT APPLICABLE LIMITS.

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.)

1. 45CSR13, R13-1910, CONDITION 6.2.1: WEEKLY VISUAL EMISSION CHECKS OF EACH EMISSION POINT SUBJECT TO AN OPACITY LIMIT. CHECKS WILL BE CONDUCTED DURING PERIODS OF NORMAL OPERATION USING PROCEDURES PER 40CFR60, APPENDIX A, METHOD 22. IF VISUAL EMISSIONS ARE DETECTED, A METHOD 9 EVALUATION WILL BE CONDUCTED WITHIN 24 HOURS.
2. 40CFR60.464(C) AND 60.465, SUBPART TT AND 45CSR13, R13-1910, CONDITION 6.2.2: INSTALL, CALIBRATE, OPERATE, AND MAINTAIN A DEVICE FOR CONTINUOUS RECORDING OF TEMPERATURE OF ANY EFFLUENT GASES INCINERATED TO ACHIEVE 98.5% EFFICIENCY. SPECIFIC ACCURACY REQUIREMENTS APPLY PER THIS CONDITION. ALL PERIODS IN EXCESS OF 3 HOURS DURING WHICH THE AVERAGE TEMPERATURE IN THE AFTERBURNER REMAINS MORE THAN 28°C (50°F) BELOW THE TEMPERATURE AT WHICH COMPLIANCE WAS DEMONSTRATED DURING THE MOST RECENT MEASUREMENT SHALL BE RECORDED AND REPORTED EVERY CALENDAR MONTH (OR SEMIANNUALLY IN NO SUCH EVENTS OCCUR IN A QUARTER).
3. 45CSR13, R13-1910B, CONDITION 6.2.3: UPON DEMONSTRATION OF COMPLIANCE WITH NOX AND CO LIMITS PER TESTING REQUIREMENTS, CONTINUAL COMPLIANCE SHALL BE DEMONSTRATED THROUGH DOCUMENTATION THAT NATURAL GAS IS THE ONLY FUEL COMBUSTED IN THE PRIME OVEN, FINISH OVEN, AND AFTERBURNER.
4. 45CSR13, R13-1910B, CONDITION 6.2.4: CONTINUAL COMPLIANCE WITH THE PARTICULATE MATTER AND SULFUR DIOXIDE LIMITS SHALL BE DEMONSTRATED THROUGH DOCUMENTATION THAT NATURAL GAS IS THE ONLY FUEL COMBUSTED IN THE PRIME OVEN, FINISH OVEN, AND AFTERBURNER.
5. 45CSR13, R13-1910B, CONDITION 6.3.1: STACK TESTING WILL BE PERFORMED TO DETERMINE CO AND NOX EMISSIONS FROM POINT 4E PER METHODS 10 AND 7 (40CFR60, APPENDIX A) ONCE PER PERMIT TERM.
6. 45CSR13, R13-1910B, CONDITION 6.3.2: VOC TESTING WILL BE PERFORMED TO DETERMINE CO AND NOX EMISSIONS FROM POINT 4E PER METHODS 10 AND 7 (40CFR60, APPENDIX A) ONCE PER PERMIT TERM.
7. 45CSR13, R13-1910B, CONDITION 6.3.3: TESTING OF THE WASTE HEAT BOILER EXHAUST SHALL BE CONDUCTED WHEN THE MAXIMUM 60% OF AFTERBURNER EXHAUST IS DIRECTED TO THE BOILER.
8. 45CSR13, R13-1910B, CONDITION 6.4.1: MAINTAIN RECORDS OF FORMALDEHYDE EMISSIONS AND CALCULATE EMISSIONS USING A MAXIMUM PERCENTAGE BY WEIGHT OF 0.075. UPDATE EMISSION ESTIMATES ON A MONTHLY BASIS.
9. 45CSR13, R13-1910B, CONDITION 6.4.2: DEMONSTRATE COMPLIANCE WITH THE SO2 LIMIT BY MAINTAINING RECORDS OF THE HOURS OF OPERATION AND THE QUANTITY AND QUALITY OF FUEL COMBUSTED EACH MONTH IN THE PRIME AND FINISH OVENS AND THE AFTERBURNER.
10. 40 CFR60.464(a), SUBPART TT AND 45CSR13, R13-1910B, CONDITION 6.4.3: COMPUTE AND RECORD THE AVERAGE VOC CONTENT OF COATINGS APPLIED DURING EACH CALENDAR MONTH ACCORDING TO EQUATIONS PROVIDED IN 40CFR60.463, SUBPART TT.
11. 45CSR13, R13-1910B, CONDITIONS 6.2.1 AND 6.4.4: MAINTAIN RECORDS OF THE VISUAL EMISSION CHECK REQUIRED IN SECTION 6.2.1. FOR A PERIOD NO LESS THAN 5 YEARS.
12. 45CSR13, R13-1910B, CONDITION 6.4.5: MAINTAIN ACCURATE RECORDS OF ALL REQUIRED POLLUTION CONTROL EQUIPMENT INSPECTIONS AND/OR PREVENTATIVE MAINTENANCE PROCEDURES FOR THE AFTERBURNER.

Are you in compliance with all applicable requirements for this emission unit? 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.)

13. 45CSR13, R13-1910B, CONDITION 6.4.6: MAINTAIN RECORDS OF THE OCCURRENCE AND DURATION OF ANY MALFUNCTION OR OPERATIONAL SHUTDOWN OR THE AFTERBURNER DURING WHICH EXCESS EMISSIONS OCCUR. RECORD: THE EQUIPMENT, STEPS TAKEN TO MINIMIZE EMISSIONS DURING THE EVENT, THE EVENT DURATION, THE ESTIMATED INCREASE IN EMISSIONS DURING THE EVENT. IF THE EVENT IS CAUSED BY A MALFUNCTION, INCLUDE: CAUSE OF THE MALFUNCTION, STEPS TAKEN TO CORRECT THE MALFUNCTION, ANY CHANGES OR MODIFICATIONS TO EQUIPMENT OR PROCEDURES THAT WOULD HELP PREVENT FUTURE RECURRENCES OF THE MALFUNCTION.
14. 40CFR60.48c, SUBPART Dc AND 45CSR13, R13-1910B, CONDITION 6.5.1: REPORTS REQUIRED BY SECTION 6.4.3 SHALL BE SUBMITTED EVERY SIX MONTHS BY THE 30TH DAY FOLLOWING THE END OF THE REPORTING PERIOD.
15. 40CFR60.465, SUBPART TT AND 45CSR13, R13-1910B, CONDITION 6.5.2: EACH REPORT REQUIRED AT THE PERMIT RENEWAL WILL INCLUDE: THE WEIGHTED AVERAGE OF THE VOC CONTENT OF COATINGS USED DURING A PERIOD OF ONE CALENDAR MONTH, THE OVERALL VOC DESTRUCTION RATE USED TO ATTAIN COMPLIANCE WITH 40CFR60.462(a)(2), SUBPART TT, AND THE COMBUSTION TEMPERATURE OF THE AFTERBURNER USED TO ATTAIN COMPLIANCE WITH 40CFR60.462(A)(2), SUBPART TT.

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

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

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 6s	Emission unit name: WASTEWATER TREATMENT	List any control devices associated with this emission unit: NONE
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
As part of the chrome waste treatment process, during the conversion of hexavalent chromium to trivalent chromium, sulfurous acid is formed. Some of the sulfurous acid decomposes to sulfur dioxide and water. Sulfur dioxide is vented to the atmosphere through source 6e.

Manufacturer: DMP	Model number: NONE	Serial number: NONE
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Construction date: Spring 1996	Installation date: 08/01/1996	Modification date(s): NA
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Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
40 GALLONS PER MINUTE WASTE WATER

Maximum Hourly Throughput: 2,400 GALLONS	Maximum Annual Throughput: 21 MILLION GALLONS	Maximum Operating Schedule: 24 HRS/DAY, 7 DAYS/WK, 52 WKS/YR
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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
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Maximum design heat input and/or maximum horsepower rating: NA	Type and Btu/hr rating of burners: NA
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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
Carbon Monoxide (CO)	0	0
Nitrogen Oxides (NO _x)	0	0
Lead (Pb)	0	0
Particulate Matter (PM _{2.5})	0	0
Particulate Matter (PM ₁₀)	0	0
Total Particulate Matter (TSP)	0	0
Sulfur Dioxide (SO ₂)	0.2	0.88
Volatile Organic Compounds (VOC)	0	0
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.).

BASED ON THE PERMIT LIMITS AND AN ASSUMED 8,760 HRS/YR OPERATION.

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). 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.

1. 45CSR13, R13-1910B, CONDITION 7.1.1: SULFUR DIOXIDE EMISSION LIMITS OF 0.20 LB/HR AND 0.88 TPY
2. 45CSR10-4.1, R13-1910B, CONDITION 7.1.2: EMISSIONS FROM ANY SOURCE OPERATION SHALL NOT EXCEED AN IN-STACK SULFUR DIOXIDE CONCENTRATION OF 2,000 PPMV.

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.)

1. 45CSR13, R13-1910B, CONDITION 7.2.1: THE WASTEWATER TREATMENT PROCESS SHALL BE OPERATED BY PROVIDING ADEQUATE MIXING OF THE WASTEWATER AND CHEMICALS, MAINTAINING PROPER PH LEVELS, AND ALLOWING SUFFICIENT REACTION TIME.
2. 45CSR13, R13-1910B, CONDITION 7.3.1: KEEP MONTHLY ENGINEERING ESTIMATES, ALONG WITH THE SUPPORTING DOCUMENTATION, OF THE AMOUNT OF SULFUR DIOXIDE EMITTED.

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

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

ATTACHMENT E - Emission Unit Form

Emission Unit Description

Emission unit ID number: 7s	Emission unit name: BRUSH UNIT	List any control devices associated with this emission unit: NONE
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Provide a description of the emission unit (type, method of operation, design parameters, etc.):
 Particulate emissions are generated by brushing steel strip with 6 aluminum oxide brushes rotating at 900 rpm. Brushes are flushed with water to wash away dirt. The system is enclosed and ducted to a ventilation fan.

Manufacturer: PROECO	Model number: NONE	Serial number: NONE
--------------------------------	------------------------------	-------------------------------

Construction date: Spring 1996	Installation date: 08/01/1996	Modification date(s): NA
--	---	------------------------------------

Design Capacity (examples: furnaces - tons/hr, tanks - gallons):
 79.1 TONS METAL COIL PROCESSES PER HOUR
 3,300 SQUARE FEET PER MINUTE PER SIDE

Maximum Hourly Throughput: 79.1 TONS METAL COIL 3,300 SQFT/MIN/SIDE	Maximum Annual Throughput: 693,000 TONS METAL COIL 1.73 BILLION SQFT/SIDE	Maximum Operating Schedule: 24 HRS/DAY, 7 DAYS/WK, 52 WKS/YR
--	--	--

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
NA			

Emissions Data		
Criteria Pollutants	Potential Emissions	
	PPH	TPY
Carbon Monoxide (CO)	0	0
Nitrogen Oxides (NO _x)	0	0
Lead (Pb)	0	0
Particulate Matter (PM _{2.5})	0.25	1.1
Particulate Matter (PM ₁₀)	0.25	1.1
Total Particulate Matter (TSP)	0.25	1.1
Sulfur Dioxide (SO ₂)	0	0
Volatile Organic Compounds (VOC)	0	0
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.).

BASED ON THE PERMIT LIMITS AND AN ASSUMED 8,760 HRS/YR OPERATION.
ASSUMING ALL PM = PM10 = PM2.5

Applicable Requirements

List all applicable requirements for this emission unit. For each applicable requirement, include the underlying rule/regulation citation and/or construction permit with the condition number. (Note: Title V permit condition numbers alone are not the underlying applicable requirements). 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.

1. 45CSR13, R13-1910B, CONDITION 8.1.1: PM EMISSION LIMITS OF 0.25 LB/HR AND 1.1 TPY
2. 45CSR7-3.1, R13-1910B, CONDITION 8.1.2: OPACITY LIMIT OF 20% EXCEPT PER 8.1.3
3. 45CSR7-3.2, R13-1910B, CONDITION 8.1.3: OPACITY < 40% IS PERMITTED FOR UP TO 5 MINUTES DURING ANY 60-MINUTE PERIOD.
4. 45CSR7-4.3, R13-1910B, CONDITION 8.1.4: CIRCUMVENTION OF 45CSR7 THROUGH ADDITION OF GAS TO EXHAUST FOR PURPOSE OF REDUCING GAS CONCENTRATIONS IS PROHIBITED.

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.)

1. WEEKLY VISUAL EMISSION CHECKS OF EACH EMISSION POINT SUBJECT TO AN OPACITY LIMIT. CHECKS WILL BE CONDUCTED DURING PERIODS OF NORMAL OPERATION USING PROCEDURES PER 40CFR60, APPENDIX A, METHOD 22. IF VISUAL EMISSIONS ARE DETECTED, A METHOD 9 EVALUATION WILL BE CONDUCTED WITHIN 24 HOURS.
2. MONTHLY VISUAL INSPECTIONS FOR EXCESS PARTICULATE MATTER ON THE ROOF IN THE AREA OF THE STACK.
3. MAINTAIN RECORDS OF VISUAL EMISSION CHECKS FOR NO LESS THAN 5 YEARS.

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

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

ATTACHMENT F
TITLE V PERMIT RENEWAL
Plant ID No. 03-54-00900054

Roll Coater, Inc.
Weirton
Permit No. R30-00900054-2003

SCHEDULE OF COMPLIANCE FORM

NOT APPLICABLE

ALL SOURCES ARE IN COMPLIANCE WITH APPLICABLE REQUIREMENTS.

ATTACHMENT G
TITLE V PERMIT RENEWAL
Plant ID No. 03-54-00900054

Roll Coater, Inc.
Weirton
Permit No. R30-00900054-2003

AIR POLLUTION CONTROL DEVICE FORMS

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: 4e-1	List all emission units associated with this control device. 4s PRIME OVEN & 5S FINISH OVEN
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Manufacturer: PROENCO SYSTEMS	Model number: NA	Installation date: 08/01/1996
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Type of Air Pollution Control Device:

<input type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input checked="" type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input type="checkbox"/> Other (describe) _____
<input type="checkbox"/> Wet Plate Electrostatic Precipitator	<input type="checkbox"/> 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	95.6	99.9
FORMALDEHYDE	95.6	99.9

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

COMBUSTION CHAMBER: 35 FEET LONG X 37 SQFT CROSS-SECTION
 RETENTION TIME: 1 SEC.
 COMBUSTION CHAMBER TEMPERATURE: 1400°F TO 1500°F

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

If Yes, **Complete ATTACHMENT H**

If No, **Provide justification.**

THIS EMISSION UNIT IS EXEMPT FROM CAM RULE REQUIREMENTS BECAUSE THE PRIME AND FINISH OVENS ARE SUBJECT TO THE NESHAP FOR SURFACE COATING OF METAL COIL (40 CFR 63, SUBPART SSSS, FINAL RULE 6/10/02) AS WELL AS THE NSPS FOR METAL SURFACE COATING (40 CFR 60, SUBPART TT).

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

ROLL COATER HAS IMPLEMENTED A CAPTURE SYSTEM MONITORING PLAN TO COMPLY WITH THE REQUIREMENTS OF THE METAL COIL SURFACE COATING NESHAP, SUBPART SSSS. THE OPERATING PARAMETER MONITORED BY THE PLAN IS THE PRESSURE DIFFERENTIAL ACROSS THE COATER ROOM ENCLOSURE (WORK STATION). THE COATER ROOMS WERE DETERMINED TO MEET THE DEFINITION OF TEMPORARY TOTAL ENCLOSURES ACCORDING TO EPA METHOD 204. APPROPRIATE MEASURES HAVE BEEN USED TO DETERMINE THE CAPTURE EFFICIENCY FOR THE COATER ROOMS. BECAUSE THE COATER ROOMS ARE PERMANENT STRUCTURES, THEY ARE CONSIDERED TO BE BUILDING ENCLOSURES.

TO ENSURE COMPLIANCE, THE SYSTEM IS PROGRAMMED TO DISENGAGE THE COATER HEADS PRIOR TO ANY 3-HOUR BLOCK AVERAGE DIFFERENTIAL PRESSURE DROPPING BELOW -0.007 INCHES WATER COLUMN.

COMPLIANCE WITH THE METAL COIL SURFACE COATING NSPS (SUBPART TT) IS ACHIEVED THROUGH CONTINUOUS RECORDING OF COMBUSTION TEMPERATURE IN ACCORDANCE WITH PERMIT CONDITION 6.2.2.

ATTACHMENT G - Air Pollution Control Device Form

Control device ID number: 4e-2	List all emission units associated with this control device. 4s PRIME OVEN & 5S FINISH OVEN	
Manufacturer: SUPERIOR BOILER	Model number: 5-WH-5000-S150-M	Installation date: 08/01/1996

Type of Air Pollution Control Device:

<input type="checkbox"/> Baghouse/Fabric Filter	<input type="checkbox"/> Venturi Scrubber	<input type="checkbox"/> Multiclone
<input type="checkbox"/> Carbon Bed Adsorber	<input type="checkbox"/> Packed Tower Scrubber	<input type="checkbox"/> Single Cyclone
<input type="checkbox"/> Carbon Drum(s)	<input type="checkbox"/> Other Wet Scrubber	<input type="checkbox"/> Cyclone Bank
<input type="checkbox"/> Catalytic Incinerator	<input type="checkbox"/> Condenser	<input type="checkbox"/> Settling Chamber
<input type="checkbox"/> Thermal Incinerator	<input type="checkbox"/> Flare	<input checked="" type="checkbox"/> Other (describe) WASTE HEAT BOILER (EXCHANGER)
<input type="checkbox"/> Wet Plate Electrostatic Precipitator	<input type="checkbox"/> 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
NA	NA	NA

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

THE WASTEHEAT BOILER IS USED TO GENERATE STEAM ON AN AS-NEEDED BASIS THROUGH INDIRECT HEAT TRANSFER FROM AFTERBURNER EXHAUST. WHEN STEAM IS NOT NEEDED, AFTERBURNER EXHAUST IS VENTED THROUGH THE BY-PASS STACKS.

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

If Yes, Complete ATTACHMENT H

If No, Provide justification.

THIS IS NOT A POLLUTANT-SPECIFIC EMISSION UNIT. IT IS INCLUDED IN THE LIST OF EMISSION UNITS BECAUSE IT VENTS AFTERBURNER EXHAUST WHEN STEAM PRODUCTION IS NEEDED, BUT EMISSION LIMITS ARE ASSOCIATED WITH THE PRIME AND FINISH OVENS AND AFTERBURNER, NOT THIS WASTEHEAT BOILER.

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

NA

ATTACHMENT H
TITLE V PERMIT RENEWAL
Plant ID No. 03-54-00900054

Roll Coater, Inc.
Weirton
Permit No. R30-00900054-2003

COMPLIANCE ASSURANCE MONITORING (CAM) PLAN FORM

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.