

West Virginia Department of Environmental Protection  
*Division of Air Quality*

Joe Manchin, III  
Governor

Randy C. Huffman  
Cabinet Secretary

# Permit to Operate



*Pursuant to*  
**Title V**  
*of the Clean Air Act*

*Issued to:*  
**Ball Metal Food Container Corporation**  
R30-00900027-2008 (Part 2 of 2)

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*John A. Benedict*  
*Director*

*Issued: May 29, 2008 • Effective: June 12, 2008*

*Expiration: May 29, 2013 • Renewal Application Due: November 29, 2012*

Permit Number: **R30-00900027-2008 (Part 2 of 2)**  
Permittee: **Ball Metal Food Container Corporation**  
Mailing Address: **3010 Birch Drive, Weirton, West Virginia 26062**

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

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Facility Location:	Weirton, Brooke County, West Virginia
Mailing Address:	3010 Birch Drive, Weirton, West Virginia 26062
Telephone Number:	304-797-0062
Type of Business Entity:	Corporation
Facility Description:	The plant receives coils of tin-plated steel which it cuts into sheets and coats with lithographic inks and/or protective varnishes. The sheets are cured in ovens and shipped off site to be made into food, aerosol or special containers or pressed into container ends.
SIC Codes:	3411
UTM Coordinates:	531.90 km Easting • 4,470.80 km Northing • Zone 17

Permit Writer: Denton McDerment

*Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.*

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

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

### 1.1 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
001-01	1E	No. C-1 Wagner Sheet Coater	1970	6,000 sheets/hour	0001
001-02	1E	No. C-1 Oven	1970	6,000 sheets/hour	0001
001-03	1E	No. C-2 Wagner Sheet Coater	1970	6,000 sheets/hour	0001
001-04	1E	No. C-2 Oven	1970	6,000 sheets/hour	0001
001-05	1E	No. C-3 Wagner Sheet Coater	1970	6,000 sheets/hour	0001
001-06	1E	No. C-3 Oven	1970	6,000 sheets/hour	0001
001-07	1E	No. C-4 Wagner Sheet Coater	1970	6,000 sheets/hour	0001
001-08	1E	No. C-4 Oven	1970	6,000 sheets/hour	0001
001-09	1E	No. C-5 Wagner Sheet Coater	1970	6,000 sheets/hour	0001
001-10	1E	No. C-5 Oven	1970	6,000 sheets/hour	0001
001-11	1E	No. C-6 Wagner Sheet Coater	1970	6,000 sheets/hour	0001
001-12	1E	No. C-6 Oven	1970	6,000 sheets/hour	0001
002-01	4E	PC-3 HOE UV Press	1997 <sup>(1)</sup>	5,100 sheets/hour	Not Applicable
002-02	4E	PC-3 HOE UV Press	1997 <sup>(1)</sup>	5,100 sheets/hour	Not Applicable
002-03	Not Applicable	PC-3 Conventional Press	1997 <sup>(1)</sup>	5,100 sheets/hour	Not Applicable
002-04	4E	PC-4 HOE UV Press	1997 <sup>(1)</sup>	5,100 sheets/hour	Not Applicable
002-05	Not Applicable	PC-4 Conventional Press	1997 <sup>(1)</sup>	5,100 sheets/hour	Not Applicable
002-06	4E	PC-5 HOE UV Press	1970	5,100 sheets/hour	Not Applicable
002-07	Not Applicable	PC-5 Conventional Press	1997 <sup>(1)</sup>	5,100 sheets/hour	Not Applicable
002-08	Not Applicable	PC-6 Conventional Press	1970	5,100 sheets/hour	Not Applicable
002-09	Not Applicable	PC-6 Conventional Press	1970	5,100 sheets/hour	Not Applicable
002-10	4E	PC-7 HOE UV Press	1997 <sup>(1)</sup>	5,100 sheets/hour	Not Applicable
002-11	4E	PC-7 HOE UV Press	1997 <sup>(1)</sup>	5,100 sheets/hour	Not Applicable
002-12	4E	PC-7 HOE UV Press	1997 <sup>(1)</sup>	5,100 sheets/hour	Not Applicable
002-13	Not Applicable	PC-7 Conventional Press	1997 <sup>(1)</sup>	5,100 sheets/hour	Not Applicable
003-01	1E	No. PC-3 Wagner Sheet Coater	1970	6,000 sheets/hour	0001
003-02	1E	No. PC-3 Wagner Oven	1970	6,000 sheets/hour	0001
003-03	1E	No. PC-4 Wagner Sheet Coater	1970	6,000 sheets/hour	0001
003-04	1E	No. PC-4 Wagner Oven	1970	6,000 sheets/hour	0001

<b>Emission Unit ID</b>	<b>Emission Point ID</b>	<b>Emission Unit Description</b>	<b>Year Installed</b>	<b>Design Capacity</b>	<b>Control Device</b>
003-05	1E	No. PC-5 Wagner Sheet Coater	1970	6,000 sheets/hour	0001
003-06	1E	No. PC-5 Wagner Oven	1970	6,000 sheets/hour	0001
003-07	1E	No. PC-6 Wagner Sheet Coater	1970	6,000 sheets/hour	0001
003-08	1E	No. PC-6 Wagner Oven	1970	6,000 sheets/hour	0001
003-09	1E	No. PC-7 Wagner Sheet Coater	1970	6,000 sheets/hour	0001
003-10	1E	No. PC-7 Wagner Oven	1970	6,000 sheets/hour	0001
006-01	3E	No. PC-8 6-color Planeta Press	1999	7,200 sheets/hour	Not Applicable
006-02	3E	No. PC-8 Planeta Press UV Sheet Coater	1999	7,200 sheets/hour	Not Applicable
007-01	2E	No. C-7 LTG1 Sheet Coater	2008	7,800 sheets/hour	0003
007-02	2E	No. C-7 LTG1 Oven	2008	7,800 sheets/hour	0003
0001	1E	Two (2) Regenerative Thermal Oxidizers	2000	6.6 MMBtu/hr-RTO	Not Applicable
0003	2E	Thermal Oxidizer	2008	6.8 MMBtu/hr	Not Applicable

(1) No permit required per permit determination PD97-138; determined decrease in VOC emissions.

### 1.2. Active R13, R14, and R19 Permits

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

<b>Permit Number</b>	<b>Date of Issuance</b>
R13-2295C	April 2, 2008

## 2.0 General Conditions

### 2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

### 2.2. Acronyms

<b>CAAA</b>	Clean Air Act Amendments	<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>CBI</b>	Confidential Business Information	<b>NSPS</b>	New Source Performance Standards
<b>CEM</b>	Continuous Emission Monitor	<b>PM</b>	Particulate Matter
<b>CES</b>	Certified Emission Statement	<b>PM<sub>10</sub></b>	Particulate Matter less than 10µm in diameter
<b>C.F.R. or CFR</b>	Code of Federal Regulations	<b>pph</b>	Pounds per Hour
<b>CO</b>	Carbon Monoxide	<b>ppm</b>	Parts per Million
<b>C.S.R. or CSR</b>	Codes of State Rules	<b>PSD</b>	Prevention of Significant Deterioration
<b>DAQ</b>	Division of Air Quality	<b>psi</b>	Pounds per Square Inch
<b>DEP</b>	Department of Environmental Protection	<b>SIC</b>	Standard Industrial Classification
<b>FOIA</b>	Freedom of Information Act	<b>SIP</b>	State Implementation Plan
<b>HAP</b>	Hazardous Air Pollutant	<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>HON</b>	Hazardous Organic NESHAP	<b>TAP</b>	Toxic Air Pollutant
<b>HP</b>	Horsepower	<b>TPY</b>	Tons per Year
<b>lbs/hr or lb/hr</b>	Pounds per Hour	<b>TRS</b>	Total Reduced Sulfur
<b>LDAR</b>	Leak Detection and Repair	<b>TSP</b>	Total Suspended Particulate
<b>m</b>	Thousand	<b>USEPA</b>	United States Environmental Protection Agency
<b>MACT</b>	Maximum Achievable Control Technology	<b>UTM</b>	Universal Transverse Mercator
<b>mm</b>	Million	<b>VEE</b>	Visual Emissions Evaluation
<b>mmBtu/hr</b>	Million British Thermal Units per Hour	<b>VOC</b>	Volatile Organic Compounds
<b>mmft<sup>3</sup>/hr or mmcf/hr</b>	Million Cubic Feet Burned per Hour		
<b>NA or N/A</b>	Not Applicable		
<b>NAAQS</b>	National Ambient Air Quality Standards		
<b>NESHAPS</b>	National Emissions Standards for Hazardous Air Pollutants		

### **2.3. Permit Expiration and Renewal**

- 2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.  
**[45CSR§30-5.1.b.]**
- 2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.  
**[45CSR§30-4.1.a.3.]**
- 2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.  
**[45CSR§30-6.3.b.]**
- 2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.  
**[45CSR§30-6.3.c.]**

### **2.4. Permit Actions**

- 2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
**[45CSR§30-5.1.f.3.]**

### **2.5. Reopening for Cause**

- 2.5.1. This permit shall be reopened and revised under any of the following circumstances:
- a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.
  - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.
  - c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
  - d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

**[45CSR§30-6.6.a.]**

## **2.6. Administrative Permit Amendments**

- 2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.  
[45CSR§30-6.4.]

## **2.7. Minor Permit Modifications**

- 2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.  
[45CSR§30-6.5.a.]

## **2.8. Significant Permit Modification**

- 2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.  
[45CSR§30-6.5.b.]

## **2.9. Emissions Trading**

- 2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.  
[45CSR§30-5.1.h.]

## **2.10. Off-Permit Changes**

- 2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:
- a. The change must meet all applicable requirements and may not violate any existing permit term or condition.
  - b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
  - c. The change shall not qualify for the permit shield.
  - d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.
  - e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

- f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

**[45CSR§30-5.9.]**

## **2.11. Operational Flexibility**

- 2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.

**[45CSR§30-5.8]**

- 2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.

**[45CSR§30-5.8.a.]**

- 2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

- a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or
- b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

**[45CSR§30-5.8.c.]**

- 2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

**[45CSR§30-2.39]**

## **2.12. Reasonably Anticipated Operating Scenarios**

- 2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.
- a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.
  - b. The permit shield shall extend to all terms and conditions under each such operating scenario; and
  - c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

## **2.13. Duty to Comply**

- 2.13.1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

[45CSR§30-5.1.f.1.]

## **2.14. Inspection and Entry**

- 2.14.1. The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
  - d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

[45CSR§30-5.3.b.]

## **2.15. Schedule of Compliance**

- 2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:
- a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
  - b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

**[45CSR§30-5.3.d.]**

## **2.16. Need to Halt or Reduce Activity not a Defense**

- 2.16.1. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

**[45CSR§30-5.1.f.2.]**

## **2.17. Emergency**

- 2.17.1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

**[45CSR§30-5.7.a.]**

- 2.17.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of 45CSR§30-5.7.c. are met.

**[45CSR§30-5.7.b.]**

- 2.17.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The permitted facility was at the time being properly operated;
- c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

- d. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, the permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[45CSR§30-5.7.c.]

- 2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

[45CSR§30-5.7.d.]

- 2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

[45CSR§30-5.7.e.]

## **2.18. Federally-Enforceable Requirements**

- 2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.

[45CSR§30-5.2.a.]

- 2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

## **2.19. Duty to Provide Information**

- 2.19.1. The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

[45CSR§30-5.1.f.5.]

## **2.20. Duty to Supplement and Correct Information**

- 2.20.1. Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

[45CSR§30-4.2.]

## **2.21. Permit Shield**

- 2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically

identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.

**[45CSR§30-5.6.a.]**

2.21.2. Nothing in this permit shall alter or affect the following:

- a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or
- b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.
- c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

**[45CSR§30-5.6.c.]**

## **2.22. Credible Evidence**

2.22.1. Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.

**[45CSR§30-5.3.e.3.B. and 45CSR38]**

## **2.23. Severability**

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.

**[45CSR§30-5.1.e.]**

## **2.24. Property Rights**

2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.

**[45CSR§30-5.1.f.4]**

## **2.25. Acid Deposition Control**

2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.

- a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.
- b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.

- c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

**[45CSR§30-5.1.d.]**

- 2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.

**[45CSR§30-5.1.a.2.]**

### 3.0 Facility-Wide Requirements

#### 3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.  
[45CSR§6-3.1.; 45CSR13, R13-2295, B.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.  
[45CSR§6-3.2.; 45CSR13, R13-2295, B.1.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.  
[40 C.F.R. §61.145(b) and 45CSR15]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.  
[45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.  
[45CSR§11-5.2]
- 3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.  
[W.Va. Code § 22-5-4(a)(14)]
- 3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.
  - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

**[40 C.F.R. 82, Subpart F]**

- 3.1.8. **Risk Management Plan.** Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.  
**[40 C.F.R. 68]**
- 3.1.9. No person shall cause, suffer, allow or permit emissions of smoke into the atmosphere from any incinerator which is twenty (20%) percent opacity or greater. (*Emission Point IDs: 1E, 2E*)  
**[45CSR§6-4.3.]**
- 3.1.10. The provision of permit condition 3.1.9. above shall not apply to smoke which is less than forty (40%) percent opacity, for a period or periods aggregating no more than eight (8) minutes per startup. (*Emission Point IDs: 1E, 2E*)  
**[45CSR§6-4.4.]**
- 3.1.11. No person shall cause, suffer, allow, or permit the emission of particles of unburned or partially burned refuse or ash from any incinerator which are large enough to be individually distinguished in the open air. (*Emission Point IDs: 1E, 2E*)  
**[45CSR§6-4.5.]**
- 3.1.12. Incinerators, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors. (*Emission Point IDs: 1E, 2E*)  
**[45CSR§6-4.6.]**
- 3.1.13. No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter.  
**[45CSR§7-5.1.]**
- 3.1.14. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures.  
**[45CSR§7-5.2.]**

- 3.1.15. **Continuous Compliance Demonstration for the Emission Rate with Add-on Controls Option** – To demonstrate continuous compliance with the applicable emission limit in 40 C.F.R. §63.3490, the organic HAP emission rate for each compliance period, determined according to the procedures in §63.3541, must be equal to or less than the applicable emission limit in §63.3490.

When calculating the organic HAP emission rate according to §§63.3541(a) through (l), do not include any coatings or thinners used on coating operations for which you use the *compliant material option*, the *emission rate without add-on controls option*, or the *control efficiency/outlet concentration option*.

**[40 C.F.R. §§ 63.3542(a) and 63.3541(a); 45CSR34]**

- 3.1.16. **Work Practice Plan** – The permittee must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, and cleaning materials used in, and waste materials generated by, the coating operations. The work practice plan must be implemented by the compliance date set forth in permit condition 3.1.15. The permittee must generate documentation that the work practice plan is being implemented on a continuous basis. The plan must specify practices and procedures to ensure that, at a minimum, the elements specified in the following paragraphs of this permit condition are implemented.
- a. All organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be stored in closed containers.
  - b. Spills of organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be minimized.
  - c. Organic-HAP-containing coatings, thinners, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.
  - d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.
  - e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.

**[40 C.F.R. §§ 63.3493(b), 63.3500(a)(2)(iii), 63.3512(j)(8), 63.3540(b)(2), 63.3541(c), 63.3542(e), 63.3550(a)(2), 63.3550(b)(2), 63.3551(c), 63.3552(d); 45CSR34; 45CSR13, R13-2295, 4.1.6. and 4.1.7.]**

- 3.1.17. **Startup, Shutdown, and Malfunction Plan** – The permittee must develop and implement a written startup, shutdown, and malfunction plan (SSMP) according to the provisions in 40 C.F.R. § 63.6(e)(3). The plan must address startup, shutdown, and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The plan must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures. Consistent with 40 C.F.R. §§ 63.6(e) and 63.7(e)(1), deviations that occur during a period of startup, shutdown, or malfunction of the emission capture system, add-on control device, or coating operation that may affect emission capture or control device efficiency are not violations if the permittee demonstrates to the Administrator's satisfaction that the permittee was operating in accordance with the SSMP. The Administrator will determine whether deviations that occur during a period that the permittee identifies as a startup, shutdown, or malfunction are violations, according to the provisions in 40

C.F.R. § 63.6(e). Refer to permit condition 3.5.14. for the Startup, Shutdown, and Malfunction reporting requirements.

[40 C.F.R. §§ 63.3500(c), 63.3542(h), 63.3552(g); 45CSR34; 45CSR13, R13-2295, 4.1.9.]

3.1.18. The permittee must always operate and maintain a source subject to 40 C.F.R. 63 Subpart KKKK, including all air pollution control and monitoring equipment used for the purposes of complying with 40 C.F.R. 63 Subpart KKKK, according to the provisions in 40 C.F.R. §63.6(e)(1)(i).

[40 C.F.R. §63.3500(b); 45CSR34]

3.1.19. Facility wide emissions from natural gas consumption shall not exceed the following:

PM <sub>10</sub>		SO <sub>2</sub>		VOC		CO		NO <sub>x</sub>	
lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
0.51	2.0	0.05	0.2	0.36	1.4	5.60	22	6.62	26

Compliance with the annual emissions limitations from natural gas consumption only shall be on a calendar year basis.

[45CSR13, R13-2295, 4.1.11.]

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

[45CSR13, R13-2295, 4.1.14.; 45CSR§13-5.11.]

### 3.2. Monitoring Requirements

3.2.1. To demonstrate compliance with permit conditions 3.1.9., 3.1.10., and 3.1.11., at least weekly, visual emission checks of each emission point subject to an opacity limit shall be conducted. For the purpose of these checks, excess visible emissions are to include visible fugitive dust emissions that leave the plant site boundaries. These checks shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the unit has visible emissions using 40 C.F.R. 60 Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40 C.F.R. 60 Appendix A, Method 9 within twenty-four (24) hours. A Method 9 evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operating at normal operating conditions. A record of each visible emission check required above shall be maintained. Said record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirement, the results of the check, what action(s), if any, was/were taken, the name of the observer, and any data required by 40 C.F.R. 60 Appendix A, Method 22 or Method 9.

[45CSR§30-5.1.c.]

3.2.2. **Periodic visual verification of recorded data.** The permittee shall perform periodic visual verification of recorded data of the combustion chamber temperatures of the thermal oxidizers (Control Device IDs 0001 and 0002) and the PTE capture systems' differential pressures. Periodic visual verification shall ensure proper

recordkeeping by checking if there are any periods when data was not acquired or other problems in the monitoring and recording of data. Periodic visual verification shall be performed once per calendar month, and no later than six (6) weeks after the previous verification.

**[40 C.F.R. § 64.3(b)(2); 45CSR§30-5.1.c.]**

- 3.2.3. **Commencement of operation.** The permittee shall conduct the monitoring required under 40 C.F.R. 64 upon issuance of this permit that includes such monitoring.

**[40 C.F.R. § 64.7(a)]**

- 3.2.4. **Proper Maintenance** – At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

**[40 C.F.R. § 64.7(b)]**

- 3.2.5. **Continued Operation** – Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 C.F.R. 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

**[40 C.F.R. § 64.7(c)]**

- 3.2.6. **Continuous Parameter Monitoring System** – The permittee must install, operate, and maintain each continuous parameter monitoring system (CPMS) for each thermal oxidizer (combustion chamber temperature) and emission capture system (differential pressure) according to the following criteria:

- a. The data collection frequency shall be at least one (1) data point read every twenty (20) seconds by a continuous electronic recorder. Forty-five (45) consecutive data points shall be averaged to generate one (1) recorded datum every complete 15-minute cycle, equivalent to four (4) data points equally spaced over one (1) hour.
- b. The permittee must determine the average of all recorded readings for each successive 3-hour period of the emission capture system and add-on control device operation.
- c. The permittee must record the results of each inspection, calibration, and validation check of the CPMS.
- d. The permittee must maintain the CPMS at all times and have available necessary parts for routine repairs of the monitoring equipment.
- e. The permittee must operate the CPMS and collect emission capture system and add-on control device parameter data at all times that a controlled coating operation is operating, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, if applicable, calibration checks and required zero and span adjustments).

- f. The permittee must not use emission capture system or add-on control device parameter data recorded during monitoring malfunctions, associated repairs, out of control periods, or required quality assurance or control activities when calculating data averages. The permittee must use all the data collected during all other periods in calculating the data averages for determining compliance with the emission capture system and add-on control device operating limits.

[40 C.F.R. §§ 63.3547(a) and 63.3557(a); 45CSR34; 40 C.F.R. § 64.3(b)(4); 45CSR13, R13-2295, 4.2.1.]

- 3.2.7. **Documentation of Need for Improved Monitoring** – After approval of monitoring under 40 C.F.R. 64, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Director and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 C.F.R. § 64.7(e)]

- 3.2.8. **Quality Improvement Plan (QIP)** – Based on the results of a determination made under permit condition 3.4.4.(2), the Administrator or the Director may require the permittee to develop and implement a QIP. Consistent with 40 C.F.R. §64.6(c)(3), the permittee is limited to an accumulation of exceedances or excursions no greater than nine (9) during a reporting period, prior to requiring the implementation of a QIP. If a QIP is required, then it shall be developed, implemented, and modified as required according to 40 C.F.R. §§ 64.8(b) through (e). Refer to permit condition 3.5.11.(2)(iii). for reporting required when a QIP is implemented.

[40 C.F.R. § 64.8]

- 3.2.9. The permittee must install the gas temperature monitors for the thermal oxidizers (Control Device IDs 0001 and 0003) according to the following parameters:

- a. The gas temperature sensor must be installed in the firebox of the thermal oxidizer or in the duct immediately downstream of the firebox before any substantial heat exchange occurs.
- b. The gas temperature sensor must be installed in a position that provides a representative temperature.
- c. The gas temperature sensor must have a minimum accuracy of  $\pm 1.2$  degrees Celsius or  $\pm 1$  percent of the temperature value in degrees Celsius, whichever is larger.
- d. The gas temperature sensors must be calibrated annually. The scheduled calibration shall be performed within twelve (12) months of the date of the previous scheduled calibration, but no earlier than six (6) months from the date of the previous scheduled calibration. This condition does not prevent the permittee from calibrating the device(s) at any time (not part of normal annual schedule) necessary to demonstrate ongoing reliability and compliance of the device.

[40 C.F.R. §§ 63.3547(c)(1)-(3), 63.3557(c)(1)-(3); 45CSR34; 40 C.F.R. §§64.3(b)(1)-(3) and 64.6(c)(1)(iii); 45CSR13, R13-2295, 4.2.2.]

### 3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set

forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.

**[WV Code § 22-5-4(a)(15) and 45CSR13, R13-2295, C.4.]**

- 3.3.2. The Director, or the Director's duly authorized representative, may conduct such other tests as the Director may deem necessary to evaluate air pollution emissions other than those noted in 45CSR§6-7.1.  
**[45CSR§6-7.2.; 45CSR13, R13-2295, B.1.]**

### **3.4. Recordkeeping Requirements**

- 3.4.1. **Monitoring information.** The permittee shall keep records of monitoring information that include the following:
  - a. The date, place as defined in this permit and time of sampling or measurements;
  - b. The date(s) analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of the analyses; and

f. The operating conditions existing at the time of sampling or measurement.

**[45CSR§30-5.1.c.2.A.; 45CSR13, R13-2295, 4.4.1.]**

3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.

**[45CSR§30-5.1.c.2.B.]**

3.4.3. **Odors.** For the purposes of 45CSR§4-3.1 (permit condition 3.1.4.) and 45CSR§6-4.6 (permit condition 3.1.12.), the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

**[45CSR§30-5.1.c., State-Enforceable only for 45CSR4.]**

3.4.4. **Response to Excursions or Exceedances under 40 C.F.R. Part 64 (CAM)**

(1) Upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

**[40 C.F.R. § 64.7(d)]**

3.4.5. **General recordkeeping requirements for 40 C.F.R. 64 (CAM).** The permittee shall comply with the recordkeeping requirements specified in permit conditions 3.4.1. and 3.4.2. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan (QIP) required pursuant to 40 C.F.R. §64.8 (permit condition 3.2.8.) and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

**[40 C.F.R. § 64.9(b)]**

3.4.6. **Recordkeeping for 40 C.F.R. 63 Subpart KKKK.** The permittee must collect and keep records of the data and information specified in this permit condition. Failure to collect and keep the records is a deviation from the applicable standard.

(a) A copy of each notification and report that the permittee submitted to comply with 40 C.F.R. 63 Subpart KKKK, and the documentation supporting each notification and report.

(b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating and thinner and the volume fraction of coating solids for each coating. If the permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee must keep a copy of the complete test report. If the permittee uses information provided by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided to the permittee by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

(c) For each compliance period, the records specified in paragraphs (c)(1) through (4) of this section.

(1) A record of the coating operations at which the permittee used each compliance option and the time periods (beginning and ending dates and times) the permittee used each option.

(2) For the *compliant material option*, a record of the calculation of the organic HAP content for each coating, using Equation 1 of 40 C.F.R. §63.3521.

(3) For the *emission rate without add-on controls option*, a record of the calculation of the total mass of organic HAP emissions for the coatings and thinners used each month, using Equations 1, 1A through 1C, and 2 of 40 C.F.R. §63.3531 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 C.F.R. §63.3531(e)(3); the calculation of the total volume of coating solids used each month, using Equation 2 of 40 C.F.R. §63.3531; and the calculation of each 12-month organic HAP emission rate, using Equation 3 of 40 C.F.R. §63.3531.

(4) For the *emission rate with add-on controls option*, records of the calculations specified in paragraphs (c)(4)(i) through (v) of this permit condition.

(i) The calculation of the total mass of organic HAP emissions for the coatings and thinners used each month, using Equations 1 and 1A through 1C of 40 C.F.R. §63.3531 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 C.F.R. §63.3531(e)(3).

(ii) The calculation of the total volume of coating solids used each month, using Equation 2 of 40 C.F.R. §63.3531.

(iii) The calculation of the mass of organic HAP emission reduction by emission capture systems and add-on control devices, using Equations 1 and 1A through 1D of 40 C.F.R. §63.3541, and Equations 2, 3, and 3A through 3C of 40 C.F.R. §63.3541, as applicable.

(iv) The calculation of the total mass of organic HAP emissions each month, using Equation 4 of 40 C.F.R. §63.3541.

(v) The calculation of each 12-month organic HAP emission rate, using Equation 5 of 40 C.F.R. §63.3541.

(5) For the *control efficiency/outlet concentration option*, records of the measurements made by the CPMS used to demonstrate compliance. For any coating operation(s) for which the permittee uses this option, the

permittee does not have to keep the records specified in paragraphs (d) through (g) of this section.

- (d) A record of the name and volume of each coating and thinner used during each compliance period.
- (e) A record of the mass fraction of organic HAP for each coating and thinner used during each compliance period.
- (f) A record of the volume fraction of coating solids for each coating used during each compliance period.
- (g) A record of the density for each coating used during each compliance period; and, if the permittee used either the *emission rate without add-on controls* or the *emission rate with add-on controls compliance option*, the density for each thinner used during each compliance period.
- (h) If the permittee used an allowance in Equation 1 of 40 C.F.R. §63.3531 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.3531(e)(3) or otherwise managed in accordance with applicable Federal and State waste management regulations, the permittee must keep records of the information specified in paragraphs (h)(1) through (3) of this permit condition.

- (1) The name and address of each TSDF or other applicable waste management location to which the permittee sent waste materials for which the permittee used an allowance in Equation 1 of 40 C.F.R. §63.3531, a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility and the date of each shipment.

- (2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 1 of 40 C.F.R. §63.3531.

- (3) The methodology used in accordance with 40 C.F.R. §63.3531(e)(3) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF or other applicable waste management location each month and the methodology to determine the mass of organic HAP contained in these waste materials. That must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.

- (i) The permittee must keep records of the date, time, and duration of each deviation.

- (j) If the permittee used the *emission rate with add-on controls option* or the *control efficiency/outlet concentration option*, the permittee must keep the records specified in paragraphs (j)(1) through (8) of this permit condition.

- (1) For each deviation, a record of whether the deviation occurred during a period of startup, shutdown, or malfunction.

- (2) The records in 40 C.F.R. §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

- (3) The records required to show continuous compliance with each operating limit specified in Table 4 to 40 C.F.R. 63 Subpart KKKK that applies to the permittee.

- (4) For each capture system that is a PTE, the data and documentation the permittee used to support a determination that the capture system meets the criteria in Method 204 of appendix M to 40 C.F.R. Part 51 for a PTE and has a capture efficiency of 100 percent, as specified in 40 C.F.R. §63.3544(a).

(5) For each capture system that is not a PTE, the data and documentation the permittee used to determine capture efficiency according to the requirements specified in 40 C.F.R. §§ 63.3543 and 63.3544(b) through (e) including the records specified in paragraphs (j)(5)(i) through (iii) of this permit condition that apply to the permittee.

(i) *Records for a liquid-to-uncaptured gas protocol using a temporary total enclosure or building enclosure.* Records of the mass of total volatile hydrocarbon (TVH) as measured by Method 204A or F of appendix M to 40 C.F.R. part 51 for each material used in the coating operation and the total TVH for all materials used during each capture efficiency test run including a copy of the test report. Records of the mass of TVH emissions not captured by the capture system that exited the temporary total enclosure (TTE) or building enclosure during each capture efficiency test run, as measured by Method 204D or E of appendix M to 40 C.F.R. part 51, including a copy of the test report. Records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of appendix M to 40 C.F.R. part 51 for either a TTE or a building enclosure.

(ii) *Records for a gas-to-gas protocol using a temporary total enclosure or a building enclosure.* Records of the mass of TVH emissions captured by the emission capture system as measured by Method 204B or C of appendix M to 40 C.F.R. part 51 at the inlet to the add-on control device including a copy of the test report. Records of the mass of TVH emissions not captured by the capture system that exited the TTE or building enclosure during each capture efficiency test run as measured by Method 204D or E of appendix M to 40 C.F.R. part 51 including a copy of the test report. Records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of appendix M to 40 C.F.R. part 51 for either a TTE or a building enclosure.

(iii) *Records for an alternative protocol.* Records needed to document a capture efficiency determination using an alternative method or protocol as specified in 40 C.F.R. §63.3544(e) if applicable.

(6) The records specified in paragraphs (j)(6)(i) and (ii) of this permit condition for each add-on control device organic HAP destruction or removal efficiency determination as specified in 40 C.F.R. §63.3545 or §63.3555.

(i) Records of each add-on control device performance test conducted according to 40 C.F.R. §63.3543 or §63.3553 and 40 C.F.R. §63.3545 or §63.3555.

(ii) Records of the coating operation conditions during the add-on control device performance test showing that the performance test was conducted under representative operating conditions.

(7) Records of the data and calculations the permittee used to establish the emission capture and add-on control device operating limits as specified in 40 C.F.R. §63.3546 or 40 C.F.R. §63.3556 and to document compliance with the operating limits as specified in Table 4 to 40 C.F.R. 63 Subpart KKKK.

(8) A record of the work practice plan required by 40 C.F.R. §63.3493 (permit condition 3.1.16.) and documentation that the permittee is implementing the plan on a continuous basis.

**[40 C.F.R. §§ 63.3512, 63.3531(h), 63.3532(d), 63.3542(i), 63.3552(h); 45CSR34]**

3.4.7. **Format and Retention of Records for 40 C.F.R. 63 Subpart KKKK.** The permittee must maintain records of the data and information specified in 40 C.F.R. 63 Subpart KKKK in accordance with the following requirements:

(a) The permittee's records must be kept in a form suitable and readily available for expeditious review, according to 40 C.F.R. §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

(b) As specified in 40 C.F.R. §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) The permittee must keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 C.F.R. §63.10(b)(1). The permittee may keep the records off site for the remaining 3 years.

**[40 C.F.R. §§ 63.3513, 63.3531(h), 63.3532(d), 63.3542(i), 63.3552(h); 45CSR34]**

3.4.8. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.1, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

**[45CSR13, R13-2295, 4.4.2.]**

3.4.9. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.1, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

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

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

**[45CSR13, R13-2295, 4.4.3.]**

### 3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.  
[45CSR§§30-4.4. and 5.1.c.3.D.]
- 3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.  
[45CSR§30-5.1.c.3.E.]
- 3.5.3. All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, mailed first class or by private carrier with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

**If to the DAQ:**

Director  
WVDEP  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
  
Phone: 304/926-0475  
FAX: 304/926-0478

**If to the US EPA:**

Associate Director  
Office of Enforcement and Permits Review  
(3AP12)  
U. S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

- 3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality.  
[45CSR§30-8.]
- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification.  
[45CSR§30-5.3.e.]
- 3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4.  
[45CSR§30-5.1.c.3.A.]

3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

3.5.8. **Deviations.**

- a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:
1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.
  2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.
  3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.
  4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

**[45CSR§30-5.1.c.3.C.]**

- b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.

**[45CSR§30-5.1.c.3.B.]**

3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.

**[45CSR§30-4.3.h.1.B.]**

3.5.10. Due to unavoidable malfunction of equipment, emissions exceeding those provided for in 45CSR6 may be permitted by the Director for periods not to exceed five (5) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.

**[45CSR§6-8.2.]**

**3.5.11. General reporting requirements for 40 C.F.R. 64 (CAM)**

- (1) On and after the date specified in 40 C.F.R. §64.7(a) by which the permittee must use monitoring that meets the requirements of 40 C.F.R. 64, the permittee shall submit monitoring reports to the DAQ in accordance with permit condition 3.5.6.
- (2) A report for monitoring under 40 C.F.R. 64 shall include, at a minimum, the information required under permit condition 3.5.8. and the following information, as applicable:
  - (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
  - (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
  - (iii) A description of the actions taken to implement a QIP during the reporting period as specified in 40 C.F.R. §64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

**[40 C.F.R. § 64.9(a)]**

**3.5.12. Semiannual Compliance Reports for 40 C.F.R. 63 Subpart KKKK.** The permittee must submit semiannual compliance reports for each affected source according to the following requirements:

(1) *Dates.* Unless the Administrator has approved a different schedule for submission of reports under 40 C.F.R. §63.10(a), the permittee must prepare and submit each semiannual compliance report according to the dates specified in paragraphs (1)(i) through (iv) of this permit condition. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(i) The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in 40 C.F.R. §§ 63.3520, 63.3530, 63.3540, or 63.3550, that applies to permittee, which is December 1, 2007. The first semiannual reporting period ends on December 31, 2007.

(ii) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(iii) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(iv) The permittee may submit the first and subsequent compliance reports according to the dates established in permit condition 3.5.6. instead of the date specified in paragraph (1)(iii) of this permit condition.

(2) *Inclusion with Title V report.* The permittee, which has obtained a Title V operating permit, must report all deviations as defined in 40 C.F.R. 63 Subpart KKKK in the semiannual monitoring report required by permit condition 3.5.6. If the permittee submits a semiannual compliance report pursuant to 40 C.F.R. §63.3511 along with, or as part of, the semiannual monitoring report required by permit condition 3.5.6., and the semiannual compliance report includes all required information concerning deviations from any emission limitation in 40

C.F.R. 63 Subpart KKKK, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the permittee may have to report deviations from permit requirements to the Director.

(3) *General requirements.* The semiannual compliance report must contain the information specified in paragraphs (3)(i) through (v) of this permit condition and the information specified in paragraphs (4) through (8) of this permit condition, as well as the information in permit condition 3.5.14.(1) that is applicable to the affected source.

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(iv) Identification of the compliance option or options specified in 40 C.F.R. §63.3491 that the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee must report the beginning and ending dates when the permittee used each option.

(v) If the permittee used the emission rate without add-on controls or the emission rate with add-on controls compliance option (40 C.F.R. §63.3491(b) or (c)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.

(4) *No deviations.* If there were no deviations from the emission limitations, operating limits, or work practice standards in 40 C.F.R. §§ 63.3490, 63.3492, and 63.3493 [permit conditions 3.1.16., 4.1.1., 4.1.2., 4.1.3., 5.1.1., 5.1.2., 5.1.3., 5.1.4., 6.1.1., 7.1.1., and 7.1.2.], the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. If you used the emission rate with add-on controls option or the control efficiency/outlet concentration option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out of control as specified in 40 C.F.R. §63.8(c)(7), the semiannual compliance report must include a statement that there were no periods during which the CPMS were out of control during the reporting period.

(5) *Deviations: compliant material option.* If the permittee used the compliant material option and there was a deviation from the applicable emission limit in § 63.3490, the semiannual compliance report must contain the information in paragraphs (5)(i) through (iv) of this section.

(i) Identification of each coating used that deviated from the emission limit, each thinner used that contained organic HAP, and the dates and time periods each was used.

(ii) The calculation of the organic HAP content (using Equation 1 of § 63.3521) for each coating identified in paragraph (5)(i) of this permit condition. The permittee does not need to submit background data supporting this calculation (*e.g.*, information provided by coating suppliers or manufacturers, or test reports).

(iii) The determination of mass fraction of organic HAP for each coating and thinner identified in

paragraph 5)(i) of this permit condition. The permittee does not need to submit background data supporting this calculation (*e.g.*, information provided by material suppliers or manufacturers, or test reports).

(iv) A statement of the cause of each deviation.

(6) *Deviations: emission rate without add-on controls option.* If the permittee used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in 40 C.F.R. §63.3490, the semiannual compliance report must contain the information in paragraphs (6)(i) through (iii) of this permit condition.

(i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.3490.

(ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The permittee must provide the calculations for Equations 1, 1A through 1C, 2, and 3 in § 63.3531; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to § 63.3531(e)(3). The permittee does not need to submit background data supporting these calculations (*e.g.*, information provided by materials suppliers or manufacturers, or test reports).

(iii) A statement of the cause of each deviation.

(7) *Deviations: emission rate with add-on controls option.* If the permittee used the emission rate with add-on controls option and there was a deviation from an emission limitation (including any periods when emissions bypassed the add-on control device and were diverted to the atmosphere), the semiannual compliance report must contain the information in paragraphs (7)(i) through (xiv) of this permit condition. That includes periods of startup, shutdown, and malfunction during which deviations occurred.

(i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in 40 C.F.R. §63.3490.

(ii) The calculations used to determine the 12-month organic HAP emission rate for each compliance period in which a deviation occurred. The permittee must provide the calculation of the total mass of organic HAP emissions for the coatings and thinners used each month, using Equations 1 and 1A through 1C of 40 C.F.R. §63.3531 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 C.F.R. §63.3531(e)(3); the calculation of the total volume of coating solids used each month, using Equation 2 of 40 C.F.R. §63.3531; the calculation of the mass of organic HAP emission reduction each month by emission capture systems and add-on control devices, using Equations 1 and 1A through 1D of 40 C.F.R. §63.3541, and Equations 2, 3, and 3A through 3C of 40 C.F.R. §63.3541, as applicable; the calculation of the total mass of organic HAP emissions each month, using Equation 4 of 40 C.F.R. §63.3541; and the calculation of the 12-month organic HAP emission rate, using Equation 5 of § 63.3541. The permittee does not need to submit the background data supporting these calculations (*e.g.*, information provided by materials suppliers or manufacturers, or test reports).

(iii) The date and time that each malfunction started and stopped.

(iv) A brief description of the CPMS.

(v) The date of the latest CPMS certification or audit.

(vi) The date and time that each CPMS was inoperative, except for zero (low-level) and high-level checks.

(vii) The date, time, and duration that each CPMS was out of control, including the information in 40 C.F.R. §63.8(c)(8).

(viii) The date and time period of each deviation from an operating limit in Table 4 to 40 C.F.R. 63 Subpart KKKK; date and time period of any bypass of the add-on control device; and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.

(ix) A summary of the total duration of each deviation from an operating limit in Table 4 to 40 C.F.R. 63 Subpart KKKK and each bypass of the add-on control device during the semiannual reporting period and the total duration as a percent of the total source operating time during that semiannual reporting period.

(x) A breakdown of the total duration of the deviations from the operating limits in Table 4 to 40 C.F.R. 63 Subpart KKKK and bypasses of the add-on control device during the semiannual reporting period into those that were due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

(xi) A summary of the total duration of CPMS downtime during the semiannual reporting period and the total duration of CPMS downtime as a percent of the total source operating time during that semiannual reporting period.

(xii) A description of any changes in the CPMS, coating operation, emission capture system, or add-on control device since the last semiannual reporting period.

(xiii) For each deviation from the work practice standards, a description of the deviation; the date and time period of the deviation; and the actions the permittee took to correct the deviation.

(xiv) A statement of the cause of each deviation.

(8) *Deviations: control efficiency/outlet concentration option.* If the permittee used the control efficiency/outlet concentration option, and there was a deviation from an emission limitation (including any periods when emissions bypassed the add-on control device and were diverted to the atmosphere), the semiannual compliance report must contain the information in paragraphs (8)(i) through (xii) of this permit condition. This includes periods of startup, shutdown, and malfunction during which deviations occurred.

(i) The date and time that each malfunction started and stopped.

(ii) A brief description of the CPMS (permit condition 3.2.6.).

(iii) The date of the latest certification or audit of the CPMS.

(iv) The date and time that each CPMS was inoperative, except for zero (low-level) and high-level checks.

(v) The date, time, and duration that each CPMS was out-of-control, including the information in 40 C.F.R. §63.8(c)(8).

(vi) The date and time period of each deviation from an operating limit in Table 4 to 40 C.F.R. 63 Subpart KKKK; date and time of any bypass of the add-on control device; and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.

(vii) A summary of the total duration of each deviation from an operating limit in Table 4 to 40 C.F.R. 63 Subpart KKKK and each bypass of the add-on control device during the semiannual reporting period and the total duration as a percent of the total source operating time during that semiannual reporting period.

(viii) A breakdown of the total duration of the deviations from the operating limits in Table 4 to 40 C.F.R. 63 Subpart KKKK and bypasses of the add-on control device during the semiannual reporting period into those that were due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

(ix) A summary of the total duration of CPMS downtime during the semiannual reporting period and the total duration of CPMS downtime as a percent of the total source operating time during that semiannual reporting period.

(x) A description of any changes in the CPMS, coating operation, emission capture system, or add-on control device since the last semiannual reporting period.

(xi) For each deviation from the work practice standards (permit condition 3.1.16.), a description of the deviation; the date and time period of the deviation; and the actions you took to correct the deviation.

(xii) A statement of the cause of each deviation.

**[40 C.F.R. §§ 63.3511(a), 63.3532(b) and (c), 63.3542(b), (c), (e), and (f), 63.3552(b), (d), and (e); 45CSR34]**

3.5.13. **Performance test reports for 40 C.F.R. 63 Subpart KKKK.** If the permittee used the *Emission rate with add-on controls option* or the *control efficiency/outlet concentration option*, the permittee must submit reports of performance test results for emission capture systems and add-on control devices no later than 60 days after completing the tests as specified in 40 C.F.R. §63.10(d)(2).

**[40 C.F.R. §63.3511(b); 45CSR34]**

3.5.14. **Startup, shutdown, malfunction reports for 40 C.F.R. 63 Subpart KKKK.** If the permittee used the *Emission rate with add-on controls option* or the *Control efficiency/outlet concentration option* and the permittee had a startup, shutdown, or malfunction during the semiannual reporting period, the permittee must submit the reports specified in paragraphs (1) and (2) of this permit condition.

(1) If the permittee's actions were consistent with the SSMP (permit condition 3.1.17.), the permittee must include the information specified in 40 C.F.R. §63.10(d) in the semiannual compliance report required by permit condition 3.5.12.

(2) If the permittee's actions were not consistent with the SSMP (permit condition 3.1.17.), the permittee must submit an immediate startup, shutdown, and malfunction report as described in paragraphs (2)(i) and (ii) of this permit condition.

(i) The permittee must describe the actions taken during the event in a report delivered by facsimile, telephone, or other means to the Administrator within 2 working days after starting actions that are inconsistent with the SSMP.

(ii) The permittee must submit a letter to the Administrator within 7 working days after the end of the event, unless the permittee has made alternative arrangements with the Administrator as specified in 40 C.F.R. §63.10(d)(5)(ii). The letter must contain the information specified in 40 C.F.R. §63.10(d)(5)(ii).

**[40 C.F.R. §63.3511(c); 45CSR34]**

### 3.6. Compliance Plan

- 3.6.1. There is no facility-wide compliance plan since the permittee certified compliance with all applicable requirements in the renewal application.

### 3.7. Permit Shield

- 3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.

- 3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

- A. **45CSR2 - To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.** All manufacturing process combustion sources located at the facility (at the time of this renewal) are not classified as *fuel burning units*, according to the definition in 45CSR§2-2.10. The definition specifically describes a fuel burning unit as a device that produces heat or power by *indirect heat transfer*. None of the sources produce heat or power by indirect heat transfer; therefore, these sources are not subject to 45CSR2.
- B. **45CSR10 - To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.** None of the combustion sources at the facility emit more than 500 pounds per year of sulfur oxides; therefore, none of the manufacturing process combustion sources are subject to the 2,000 ppmv limit (45CSR§10-4.1.) in accordance with 45CSR§10-4.1.e. Furthermore, all manufacturing process combustion sources located at the facility (at the time of this renewal) are not classified as *fuel burning units*, according to the definition in 45CSR§10-2.8. The definition specifically describes a fuel burning unit as a device that produces heat or power by *indirect heat transfer*. None of the sources produce heat or power by indirect heat transfer; therefore, these sources are not subject to 45CSR10.
- C. **45CSR21 - Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds.** The facility is not located in Cabell, Kanawha, Putnam, Wayne, or Wood counties and is not subject to this rule according to 45CSR§21-1.1.
- D. **45CSR27 – To Prevent and Control the Emissions of Toxic Air Pollutants.** The facility does not emit any of the listed toxic air pollutants in quantities greater than the indicated thresholds (i.e. formaldehyde emissions less than 1,000 pounds).
- E. **45CSR29 - Emission Statements for Volatile Organic Compounds.** This facility is located in Brooke County, West Virginia. Since it is not located in Putnam, Kanawha, Cabell, Wayne, Wood, or Greenbrier Counties, 45CSR29 does not apply to this facility according to 45CSR§29-3.3.
- F. **40 C.F.R. Part 60 Subpart TT - Standards of Performance for Metal Coil Surface Coating.** This facility cuts the metal coils prior to coating, and as such, Subpart TT is not applicable. However, since the facility is similar to Subpart TT type facilities and has approximately the same capture and destruction rates, there were conditions in R13-2295A that required emission tests to be done in accordance with methods set forth in 40 C.F.R. 60 Subpart TT.

- G. **40 C.F.R. Part 63 Subpart T – *National Emission Standards for Halogenated Solvent Cleaning.*** The permittee does not use any halogenated solvents in a concentration greater than 5 percent by weight as a cleaning and/or drying agent in the parts washers at the facility.
- H. **40 C.F.R. Part 63 Subpart SSSS – *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil.*** According to 40 C.F.R. §63.5090(a), this subpart applies to each facility that is a major source of HAP at which a coil coating line is operated. The facility does not operate a coil coating line (which is defined in 40 C.F.R. §63.5110); therefore, 40 C.F.R. Part 63 Subpart SSSS is not applicable to the facility.

#### **4.0 Source-Specific Requirements [Coaters C-1, C-2, C-3, C-4, C-5, and C-6; Emission Unit IDs: 001-01, 001-03, 001-05, 001-07, 001-09, 001-11; Emission Point ID: 1E]**

##### **4.1. Limitations and Standards**

- 4.1.1. The operating temperature in the Regenerative Thermal Oxidizers' (RTO's) combustion chamber shall be maintained at a minimum of 1,450°F (815°C) initially, and thereafter at a minimum temperature as established by 40 CFR §63.3556(a).  
**[45CSR13, R13-2295, 4.1.13.; 40 C.F.R. §§ 63.3492(b), 63.3546(a), 63.3556(a); 45CSR34]**
- 4.1.2. The permittee shall maintain the direction of the air flow at all times into the permanent total enclosure (PTE according to U.S. EPA Method 204 of 40 C.F.R. Part 51, Appendix M) capture device; and the differential pressure across the PTE of the coaters (Em. Unit IDs 001-01, 001-03, 001-05, 001-07, 001-09, 001-11) shall not be less than 0.007 inches of water relative to atmospheric pressure.  
**[40 C.F.R. § 63.3492(b); 45CSR34]**
- 4.1.3. For the coaters (Em. Unit IDs 001-01, 001-03, 001-05, 001-07, 001-09, 001-11), the permittee must limit organic HAP emissions to the atmosphere to no more than 0.26 lb HAPs/gal solids; or reduce organic HAP emissions as THC (as carbon) to the atmosphere by 95 percent.  
**[40 C.F.R. § 63.3490(b); 45CSR34; 45CSR13, R13-2295, 4.1.12.]**
- 4.1.4. The maximum allowable particulate emissions for the Regenerative Thermal Oxidizers (controlling the emissions from the coaters and presses, which are grandfathered) are 1.4 pounds per hour per RTO.  
**[45CSR§6-4.1.]**

##### **4.2. Monitoring Requirements**

- 4.2.1. **Combustion Chamber Temperature in RTO (Control Device ID: 0001).** To determine compliance with the minimum temperature within the Regenerative Thermal Oxidizers (Control Device ID 0001) combustion chamber set forth in permit condition 4.1.1., the permittee shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated. This device shall have an accuracy as set forth in condition 3.2.9. The permittee shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in the incinerator remains more than 28°C (50°F) below the temperature set forth in permit condition 4.1.1. A period of time meeting these aforementioned temperature and time criteria shall be deemed an excursion for purposes of 40 C.F.R. Part 64, thus initiating an inspection and evaluation, corrective action, recordkeeping and reporting requirement (permit conditions 3.4.4., 3.4.5., and 3.5.11.). This is Indicator 1 of 2 under the proposed 40 C.F.R. 64 plan for the coaters and regenerative thermal oxidizer. This is also Indicator 1 of 2 under the proposed 40 C.F.R. 64 plan for the coaters (Em. Unit IDs 003-03, 003-05, 003-07, 003-09) in Section 7.0. of this permit.  
**[40 C.F.R. §§ 64.3(a)(1), 64.3(a)(2), 64.3(a)(3)(i), 64.3(b)(3), 64.6(c)(1), and 64.6(c)(2); 40 C.F.R. § 63.3492(b), 63.3546(a), 63.3500(a)(2)(ii), 63.3551(b), 63.3552(b); 45CSR34]**
- 4.2.2. **Air Flow Direction and Differential Pressure across PTE** – The permittee shall collect (*i.e.*, monitor) at all times the direction of air flow into the PTE; and shall install, calibrate, maintain, and continuously operate a monitoring device for the continuous measurement of the pressure loss at the permanent total enclosure (PTE) for the coaters (Em. Unit IDs 001-01, 001-03, 001-05, 001-07, 001-09, 001-11), which directs emissions to thermal oxidizer 0001. The pressure drop will be measured inside the permanent total enclosure. An excursion shall be defined as recorded differential pressure readings less than the acceptable minimum pressure drop of

90% of the limit in permit condition 4.1.2. (which product is equal to 0.0063 inches of water column) for a period of time in excess of 30 minutes. Excursions initiate an inspection and evaluation, corrective action, recordkeeping and reporting requirement (permit conditions 3.4.4., 3.4.5., and 3.5.11.). The monitoring device accuracy is to be certified by the manufacturer and recalibrated as necessary in accordance with permit condition 4.3.2. The monitoring system shall continually sense the indicator and function in accordance with permit condition 3.2.6. This is Indicator 2 of 2 under the proposed 40 C.F.R. 64 plan for the coaters (Em. Unit IDs 001-01, 001-03, 001-05, 001-07, 001-09, 001-11) and thermal oxidizer (Control Device ID 0001).

**[40 C.F.R. §§ 64.3(a)(1), 64.3(a)(2), 64.3(a)(3)(i), 64.3(b)(3), 64.6(c)(1), and 64.6(c)(2); 40 C.F.R. §§ 63.3492(b), 63.3500(a)(2)(ii), 63.3551(b), 63.3552(b)]**

- 4.2.3. **Valve Inspection Plan for Regenerative Thermal Oxidizers.** The permittee must develop, implement, and submit a valve inspection plan for the regenerative thermal oxidizers (Control Device ID 0001) that documents the steps taken to minimize the amount of leakage during the regenerative process. This plan can include, but is not limited to, routine inspection of key parameters of the valve operating system (*e.g.*, solenoid valve operation, air pressure, hydraulic pressure); visual inspection of the valves during internal inspections; and/or actual testing of the emission stream for leakage. If a problem is discovered during an inspection, the permittee must take corrective action as soon as practicable.

**[40 C.F.R. §§ 63.3492(b), 63.3546(c)(2), 63.3556(c)(2); 45CSR34]**

#### **4.3. Testing Requirements**

- 4.3.1. **Calibration of Temperature Measuring Device.** The permittee shall annually calibrate the temperature measuring devices (thermocouple) used to monitor and record the combustion chamber temperature of the regenerative thermal oxidizers (Control Device ID 0001, Emission Point ID 1E). The calibration shall be performed within twelve (12) months of the date of the previous calibration, but no earlier than six (6) months from the date of the previous calibration. This requirement does not prevent the permittee from calibrating if necessary on a more frequent basis as needed.

**[40 C.F.R. §§ 64.3(b)(3) and 64.6(c)(1)(iii)]**

- 4.3.2. **Calibration of Pressure Measuring Device.** The permittee shall annually calibrate the pressure measuring devices used to monitor and record the differential pressure across the PTE leading to the thermal oxidizers 0001. The calibration shall be performed within twelve (12) months of the date of the previous calibration, but no earlier than six (6) months from the date of the previous calibration. The pressure measuring devices shall have a minimum accuracy sufficient to demonstrate compliance with applicable pressure limits (permit conditions 4.1.2., and 4.2.2.). This requirement does not prevent the permittee from calibrating if necessary on a more frequent basis as needed.

**[40 C.F.R. §§ 64.3(b)(3) and 64.6(c)(1)(iii)]**

#### **4.4. Recordkeeping Requirements**

- 4.4.1. The permittee shall maintain records required to show continuous compliance with the combustion chamber temperature (permit condition 4.1.1.) of the regenerative thermal oxidizers (Control Device ID 0001), and the differential pressure (permit condition 4.1.2.) across the permanent total enclosure (PTE) capture device of the coaters.

**[40 C.F.R. §63.3512(j)(3); 45CSR34; 40 C.F.R. §64.6(c)(2)]**

- 4.4.2. Refer to permit condition 3.4.6. and 3.4.7. for recordkeeping requirements to demonstrate compliance with permit condition 4.1.3.

4.4.3. Refer to permit condition 3.4.5. for recordkeeping requirements pursuant to 40 C.F.R. Part 64.

#### **4.5. Reporting Requirements**

4.5.1. Refer to permit conditions 3.5.11., 3.5.12., 3.5.13., and 3.5.14.

#### **4.6. Compliance Plan**

4.6.1. There is no compliance plan since the permittee certified compliance in the renewal application.

## 5.0 Source-Specific Requirements [LTG-1 Coater and Oven, Emission Unit ID: 007-01 and 007-02; Thermal Oxidizer, Control Device ID: 0003, Emission Point ID: 2E]

### 5.1. Limitations and Standards

- 5.1.1. For the LTG-1 coater, the permittee must limit organic HAP emissions to the atmosphere to no more than 0.26 lb HAPs/gal solids; or reduce organic HAP emissions as THC (as carbon) to the atmosphere by at least 95 percent.  
[40 C.F.R. § 63.3490(b); 45CSR34]
- 5.1.2. The permanent total enclosure (PTE) for sheet coating line LTG1 shall have capture efficiency of 100% and shall meet the criteria given for PTEs in U.S. EPA Method 204 of 40 C.F.R. Part 51, Appendix M.  
[45CSR13, R13-2295, 4.1.4.; 40 C.F.R. §§ 63.3490(a), 63.3491(d); 45CSR34]
- 5.1.3. The operating temperature in the Integrated Thermal Oxidizers' combustion chamber shall be maintained at a minimum of 1,400°F (760°C) initially, and then after the initial performance test at a minimum temperature as established by 40 CFR §63.3556(a).  
[45CSR13, R13-2295, 4.1.8.; 40 C.F.R. § 63.3492(b); 45CSR34]
- 5.1.4. At all times, the direction of the air flow shall be into the PTE for sheet coating line LTG1, and the pressure drop across the enclosures shall be at least 0.007 inch H<sub>2</sub>O, as established in U.S. EPA Method 204 of 40 C.F.R. Part 51, Appendix M.  
[45CSR13, R13-2295, 4.1.5.; 40 C.F.R. § 63.3492(b); 45CSR34]
- 5.1.5. Emissions from the new coating line LTG-1 shall not exceed the following:

Source Description	VOC	
	lb/hr	tpy
LTG-1	6.91	30.26

[45CSR13, R13-2295, 4.1.10.]

- 5.1.6. Old coating line LTG2, first permitted in R13-2295 (approved June 2, 1999), was never installed. Therefore, permission to install that line is hereby revoked.  
[45CSR13, R13-2295, 4.1.1.]
- 5.1.7. Old coating line LTG C-7 shall be disconnected and permanently removed from service before new sheet coating line LTG-1 is placed into service.  
[45CSR13, R13-2295, 4.1.2.]
- 5.1.8. The integrated thermal oxidizer for the new sheet coating line LTG-1 shall reduce emissions of total HAPs, measured as THC (as carbon) by at least 97%.  
[45CSR13, R13-2295, 4.1.3.]

### 5.2. Monitoring Requirements

- 5.2.1. **Combustion Chamber Temperature in the Integrated Thermal Oxidizers (Control Device ID: 0003).** To determine compliance with the minimum temperature within the LTG-1 integrated oxidizer combustion

chamber set forth in permit condition 5.1.3., the permittee shall install, calibrate, operate and maintain a device that continuously records the combustion temperature of any effluent gases incinerated. This device shall have an accuracy as set forth in condition 3.2.9. The permittee shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in the incinerator remains more than 28°C (50°F) below the temperature set forth in permit condition 5.1.3. A period of time meeting these aforementioned temperature and time criteria shall be deemed an excursion for purposes of 40 C.F.R. Part 64, thus initiating an inspection and evaluation, corrective action, recordkeeping and reporting requirement (permit conditions 3.4.4., 3.4.5., and 3.5.11.). This is Indicator 1 of 2 under the proposed 40 C.F.R. 64 plan for the LTG-1 coater and thermal oxidizer 0003.

**[40 C.F.R. §§ 64.3(a)(1), 64.3(a)(2), 64.3(a)(3)(i), 64.3(b)(3), 64.6(c)(1), and 64.6(c)(2); 40 C.F.R. §§ 63.3500(a)(2)(ii), 63.3550(b)(1), 63.3551(b), 63.3552(b), 63.3556(a); 45CSR34]**

- 5.2.2. **Air Flow Direction and Differential Pressure across PTE** – The permittee shall collect (*i.e.*, monitor) at all times the direction of air flow into the PTE; and shall install, calibrate, maintain, and continuously operate a monitoring device for the continuous measurement of the pressure loss at the permanent total enclosure (PTE) for the LTG-1 coater, which directs emissions to thermal oxidizer 0003. The pressure drop will be measured inside the permanent total enclosure. For the purposes of 40 C.F.R. Part 64, an excursion shall be defined as recorded differential pressure readings less than the acceptable minimum pressure drop of 90% of the limit in permit condition 5.1.4. (which product is equal to 0.0063 inches of water column) for a period of time in excess of 30 minutes. Excursions initiate an inspection and evaluation, corrective action, recordkeeping and reporting requirement (permit conditions 3.4.4., 3.4.5., and 3.5.11.). The monitoring device accuracy is to be certified by the manufacturer and recalibrated as necessary in accordance with permit condition 5.3.3. The monitoring system shall continually sense the indicator and function in accordance with permit condition 3.2.6. This is Indicator 2 of 2 under the proposed 40 C.F.R. 64 plan for the LTG-1 coater and thermal oxidizers 0003.

**[40 C.F.R. §§ 64.3(a)(1), 64.3(a)(2), 64.3(a)(3)(i), 64.3(b)(3), 64.6(c)(1), and 64.6(c)(2); 40 C.F.R. §§ 63.3500(a)(2)(ii), 63.3550(b)(1), 63.3551(b), 63.3552(b); 45CSR34]**

### 5.3. Testing Requirements

- 5.3.1. To determine compliance with the emission limits set forth in permit condition 5.1.5., the criteria for permanent total enclosure pursuant to permit condition 5.1.2. must be satisfied, and records kept pursuant to permit condition 5.4.1., or equivalent shall be used. Or, as required by the Director, the permittee shall perform stack tests, at maximum production capacity, in accordance with the appropriate test outlined in 40 CFR 60 APPENDIX A – TEST METHODS, or alternate method approved by the Director. These tests shall be performed upon request by the Director or a duly authorized representative of the Director. The annual emission rate shall be determined by multiplying the results of the stack test (in pounds/hour) by the hours of operation as reported under permit condition 5.4.1. More specifically, Reference Method 25 shall be used, both for measuring the VOC concentration in each gas stream entering and leaving the control device (incinerators) and for measuring the VOC concentration in each gas stream emitted directly to the atmosphere. Method 1 shall be used for sample and velocity traverses; Method 2 for velocity and volumetric flow rate; Method 3 for gas analysis; Method 4 for stack gas moisture; Method 5 for particulate matter; and Method 6 for sulfur dioxide. For Method 25, the sampling time for each of three runs is to be at least 60 minutes, and the minimum sampling volume is to be at least 0.003 dry standard cubic meters (DSCM). However, shorter sampling times or small volumes, when necessitated by process variables or other factors, may be approved by the Administrator.

**[45CSR13, R13-2295, B.6.; 45CSR§30-5.1.c.]**

- 5.3.2. **Calibration of Temperature Measuring Device.** The permittee shall annually calibrate the temperature measuring devices (thermocouple) used to monitor and record the combustion chamber temperature of the integrated thermal oxidizer (Control Device ID 0002, Emission Point ID 2E). The calibration shall be performed within twelve (12) months of the date of the previous calibration, but no earlier than six (6) months from the date of the previous calibration. This requirement does not prevent the permittee from calibrating if necessary on a more frequent basis as needed.  
**[40 C.F.R. §§ 64.3(b)(3), and 64.6(c)(1)(iii)]**
- 5.3.3. **Calibration of Pressure Measuring Device.** The permittee shall annually calibrate the pressure measuring devices used to monitor and record the differential pressure across the PTE leading to the thermal oxidizer 0002. The calibration shall be performed within twelve (12) months of the date of the previous calibration, but no earlier than six (6) months from the date of the previous calibration. The pressure measuring devices shall have a minimum accuracy sufficient to demonstrate compliance with applicable pressure limits (permit conditions 5.1.4., 5.2.2.). This requirement does not prevent the permittee from calibrating if necessary on a more frequent basis as needed.  
**[40 C.F.R. §§ 64.3(b)(3), and 64.6(c)(1)(iii)]**
- 5.3.4. All emission capture systems, add-on control devices, and CPMS must be installed and operating no later than initial startup date. The permittee must conduct a performance test of each capture system and add-on control device according to §§ 63.3553, 63.3554, and 63.3555 and establish the operating limits required by 40 C.F.R. §63.3492 no later than 180 days after the initial startup date.  
**[40 C.F.R. § 63.3550(a)(1); 45CSR34; 45CSR13, R13-2295, 4.3.1.]**

#### **5.4. Recordkeeping Requirements**

- 5.4.1. For the sheet coating line LTG-1, the following records shall be maintained on-site for a period of 5 years and upon the request of the Secretary shall be certified by the plant manager or corporate officer and copies of these certified records shall be sent to the Secretary no later than fifteen (15) days following the Secretary's request:
- (a) The monthly usage of each Coating, Varnish, Thinner, Solvent, Fountain Solution, and the VOC Content of each.
  - (b) The hours of operation of the LTG-1 coating line during each month.
  - (c) Tons per month of VOC emitted from the LTG-1 coating line.
  - (d) Average pounds per hour of VOCs emitted from the LTG-1 coating line.
- [45CSR13, R13-2295, 4.4.4.]**
- 5.4.2. The permittee shall maintain records required to show continuous compliance with the combustion chamber temperature (permit condition 5.1.3.) of the thermal oxidizer (Control Device ID 0003), and the differential pressure (permit condition 5.1.4.) across the permanent total enclosure (PTE) capture device of the LTG-1 coater.  
**[40 C.F.R. § 63.3512(j)(3); 45CSR34; 40 C.F.R. §64.6(c)(2)]**
- 5.4.3. Refer to permit condition 3.4.6. and 3.4.7. for recordkeeping requirements to demonstrate compliance with permit condition 5.1.1.

- 5.4.4. Refer to permit condition 3.4.5. for recordkeeping requirements pursuant to 40 C.F.R. Part 64.
- 5.4.5. For LTG-1, the permittee does not need to comply with the operating limits for the emission capture system and add-on control device required by 40 C.F.R. §63.3492 until after the permittee has completed the performance tests specified in permit condition 5.3.4. Instead, the permittee must maintain a log detailing the operation and maintenance of the emission capture system, add-on control device, and continuous parameter monitors during the period between the compliance date and the performance test. The permittee must begin complying with the operating limits on the date the permittee completes the performance tests specified in permit condition 5.3.4. **[40 C.F.R. §63.3550(a)(4); 45CSR34]**

## **5.5. Reporting Requirements**

- 5.5.1. Refer to permit conditions 3.5.11., 3.5.12., 3.5.13., and 3.5.14.

## **5.6. Compliance Plan**

- 5.6.1. There is no compliance plan since the permittee certified compliance in the renewal application.

## 6.0 Source-Specific Requirements [Planeta Coater Line PC-8; Emission Unit IDs: 006-01, 006-02; Emission point ID: 3E]

### 6.1. Limitations and Standards

6.1.1. The permittee shall use coatings and thinners used in the coating operation to limit the organic HAP emission rate to be less than or equal to 0.26 lbs HAP/gal solids, calculated as a rolling 12-month emission rate and determined on a monthly basis using the procedures in 40 C.F.R. §§ 63.3531(a) through (g) [40 C.F.R. § 63.3490(b), 63.3500(a)(2)(i), 63.3531(a) through (h), 63.3532(a); 45CSR34]

6.1.2. Emissions from the Planeta Press (PC8) shall not exceed the following:

Source Description	VOC	
	lb/hr	tpy
Planeta Press (PC-8)	0.32	1.35

[45CSR13, R13-2295, 4.1.10.]

### 6.2. Monitoring Requirements

6.2.1. Reserved.

### 6.3. Testing Requirements

6.3.1. Reserved.

### 6.4. Recordkeeping Requirements

6.4.1. To demonstrate continuous compliance with the limit in permit condition 6.1.1., the organic HAP emission rate for each compliance period, determined according to §§ 63.3531(a) through (g), must be less than or equal to the emission limit in permit condition 6.1.1. [40 C.F.R. §§ 63.3500(a)(2)(i), 63.3532(a); 45CSR34]

6.4.2. When calculating the organic HAP emission rate according to §63.3531, do not include any coatings or thinners used on coating operations for which you use the *compliant material option*, the *emission rate with add-on controls option*, or the *control efficiency/outlet concentration option* or coating operations in a different affected source in a different subcategory. [40 C.F.R. § 63.3531; 45CSR34]

6.4.3. The permittee shall perform recordkeeping according to permit conditions 3.4.6. and 3.4.7.

6.4.4. For the Planeta UV coating line [PC-8 (#006)], the following records shall be maintained on-site for a period of 5 years and upon the request of the Secretary shall be certified by the plant manager or corporate officer and copies of these certified records shall be sent to the Secretary no later than fifteen (15) days following the Secretary's request:

(a) The monthly usage of each Coating, Varnish, Thinner, Solvent, etc., and the VOC Content of each.

- (b) The hours of operation of the Planeta Press during each month.
- (c) Tons per month of VOC emitted from the Planeta Press.
- (d) Average pounds per hour of VOCs emitted from the Planeta Press.

[45CSR13, R13-2295, 4.4.4.]

## **6.5. Reporting Requirements**

- 6.5.1. Refer to permit condition 3.5.12. concerning reporting requirements pursuant to 40 C.F.R. Part 63 Subpart KKKK.

## **6.6. Compliance Plan**

- 6.6.1. There is no compliance plan since the permittee certified compliance in the renewal application.

**7.0 Source-Specific Requirements [Coater Lines PC-3, PC-4, PC-5, PC-6, and PC-7; Emission Unit IDs: 003-03, 003-04, 003-05, 003-06, 003-07, 003-08, 003-09, 003-10; Emission Point ID: 1E]**

**7.1. Limitations and Standards**

- 7.1.1. The permittee shall use coatings and thinners used in the coating operations and the emission reductions achieved by the emission capture system and thermal oxidizers to limit the organic HAP emission rate to be less than 0.26 lbs HAP/gal solids, calculated as a rolling 12-month emission rate and determined on a monthly basis. **[40 C.F.R. § 63.3490(b); 45CSR34]**
- 7.1.2. The differential pressure at the inlet duct of the regenerative thermal oxidizer (Control Device ID 0001), that controls emissions from the coaters, shall not be less than 1.70 inches of water relative to atmospheric pressure. **[40 C.F.R. § 63.3492(b); 45CSR34]**
- 7.1.3. The maximum allowable particulate emissions for the Regenerative Thermal Oxidizers (controlling the emissions from the coaters and presses, which are grandfathered) are 1.4 pounds per hour per RTO. **[45CSR§6-4.1.]**

**7.2. Monitoring Requirements**

- 7.2.1. **Initial and Continuous Compliance with the 40 C.F.R. 63 Subpart KKKK Emission Limit.** The permittee shall follow the procedures in 40 C.F.R. §§ 63.3541(e) through (n) to demonstrate initial and continuous compliance with the emission limit set forth in permit condition 7.1.1. **[40 C.F.R. §§ 63.3541(d), 63.3542(a), and 45CSR34]**
- 7.2.2. **Differential Pressure at RTO Inlet** – The permittee shall install, calibrate, maintain, and continuously operate a monitoring device for the continuous measurement of the pressure loss at the thermal oxidizer inlet (control device ID 0001), which controls emissions from the coaters (Em. Unit IDs 003-03, 003-05, 003-07, 003-09). The pressure drop will be measured inside the oxidizer inlet duct. An excursion shall be defined as recorded differential pressure readings less than the acceptable minimum pressure drop of 90% of the limit in permit condition 7.1.2. (which product is equal to 1.53 inches of water column) for a period of time in excess of 30 minutes. Excursions initiate an inspection and evaluation, corrective action, recordkeeping and reporting requirement (permit conditions 3.4.4., 3.4.5., and 3.5.11.). The monitoring system shall continually sense the indicator and function in accordance with permit condition 3.2.6. This is Indicator 2 of 2 under the proposed 40 C.F.R. 64 plan for the press lines PC-3 through PC-7 (Em. Unit IDs 003-03, 003-05, 003-07, 003-09) and thermal oxidizer (Control Device ID 0001). **[40 C.F.R. §§ 64.3(a)(1), 64.3(a)(2), 64.3(a)(3)(i), 64.3(b)(3), 64.6(c)(1), and 64.6(c)(2); 40 C.F.R. §§ 63.3492(b), 63.3500(a)(2)(ii), 63.3541(b), 63.3542(c)]**
- 7.2.3. **Combustion Chamber Temperature in RTO (Control Device ID: 0001).** Monitoring of the combustion chamber temperature according to permit condition 4.2.1. will satisfy the same temperature monitoring requirements for the coater lines PC-3 through PC-7.
- 7.2.4. Compliance with the particulate matter emissions limitations established for the Regenerative Thermal Oxidizers (permit condition 7.1.3.) shall be shown by demonstrating that natural gas was used as the only fuel in the RTOs. **[45CSR§30-5.1.c.]**

### **7.3. Testing Requirements**

- 7.3.1. **Calibration of Pressure Measuring Device.** The permittee shall annually calibrate the pressure measuring devices used to monitor and record the differential pressure at the inlet of the regenerative thermal oxidizers (Control Device ID 0001). The calibration shall be performed within twelve (12) months of the date of the previous calibration, but no earlier than six (6) months from the date of the previous calibration. The pressure measuring devices shall have a minimum accuracy of 0.01 inches of water. This requirement does not prevent the permittee from calibrating if necessary on a more frequent basis as needed.  
**[40 C.F.R. §§ 64.3(b)(3) and 64.6(c)(1)(iii)]**
- 7.3.2. **Calibration of Temperature Measuring Device.** Calibration of the combustion chamber temperature measuring device according to permit condition 4.3.1. will satisfy the calibration requirements for the regenerative thermal oxidizer controlling emissions from the coater lines PC-3 through PC-7.
- 7.3.3. **Destruction Efficiency Testing for RTOs (Control Device ID 0001).** Destruction efficiency testing performed according to permit condition 4.3.3. will satisfy the testing requirements for the regenerative thermal oxidizer controlling emissions from the coater lines PC-3 through PC-7.

### **7.4. Recordkeeping Requirements**

- 7.4.1. Refer to permit condition 3.4.6. and 3.4.7. for recordkeeping requirements to demonstrate compliance with permit condition 7.1.1.
- 7.4.2. Refer to permit condition 3.4.5. for recordkeeping requirements pursuant to 40 C.F.R. Part 64.

### **7.5. Reporting Requirements**

- 7.5.1. Refer to permit conditions 3.5.11., 3.5.12., 3.5.13., and 3.5.14.

### **7.6. Compliance Plan**

- 7.6.1. There is no compliance plan since the permittee certified compliance in the renewal application.