

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:*  
ACF Huntington, Inc.  
R30-01100031-2010

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*John A. Benedict  
Director*

*Issued: November 5, 2010 • Effective: November 19, 2010  
Expiration: November 5, 2015 • Renewal Application Due: May 5, 2015*

Permit Number: R30-01100031-2010  
Permittee: ACF Huntington, Inc.  
Permittee Mailing Address: 2300 Third Avenue; Huntington, WV 25703

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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:	Huntington, Cabell County, West Virginia
Facility Mailing Address:	2300 Third Avenue; Huntington, WV 25703
Telephone Number:	(304) 529-3211
Type of Business Entity:	Corporation
Facility Description:	Manufacturer and surface coater of metal parts and products.
SIC Codes:	4011, 3473
UTM Coordinates:	376.20 km Easting • 4253.90 km Northing • Zone 17

Permit Writer: Rex Compston

*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	
					ID	Type
005-01	008	Weld Seam Blast	1985	1,477 lbs grit/hr	0008	Single Cyclone
005-02	009	Panghorn Interior Blast	1960s	14,335 lbs grit/hr	0009	Baghouse/Fabric Filter
005-03	00A	Auto Blast	1960s	152,681 lbs grit/hr	000A & 000B	Baghouse/Fabric Filter
005-04		Hand Blast				
005-05		Finish Blast				
003-01	001	Primary Interior Lining	1930s	Varies	0001	Baghouse/Fabric Filter
003-02	002	Exterior Prime	1930s	Varies	0002	Water Wash control system
003-03	003	Secondary Interior Lining	1930s	Varies	0003	Baghouse/Fabric Filter
003-04	004	Finish Booth	1930s	Varies	0004	Water Wash Control System
003-06	006	Stencil Booth	1930s	Varies	0006	Baghouse/Fabric Filter
003-07	007	Final Touch Up	1930s	Varies	0007	Baghouse/Fabric Filter
003-08	NAP	Pre-Priming Application	1930s	Varies	---	None
003-09	00B	Anti-Skid Application	1930s	Varies	---	None

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

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

Permit Number	Date of Issuance
R13-2038C	1/4/2006

## 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 monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

### 2.2. Acronyms

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

### **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 is prohibited except as noted in 45CSR§6-3.1. [45CSR§6-3.1.]
- 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 or allow 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.]
- 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 45CSR34]
- 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. When emissions on an annual basis of one or more of the greenhouse gases listed below are greater than the *de minimis* amounts listed below, all greenhouse gases emitted above the *de minimis* amounts shall be reported to the Secretary under 45CSR§42-4. (see Section 3.5.):

Greenhouse Gas Compound	tons/year
carbon dioxide	10,000
methane	476
nitrous oxide	32.6
hydrofluorocarbons	0.855
perfluorocarbons	1.09
sulfur hexafluoride	0.42

**[45CSR§42-3.1., State-Enforceable only.]**

## 3.2. Monitoring Requirements

- 3.2.1. *[Reserved]*

## 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:
- 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.
  - 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), 45CSR13, R13-2038, Condition 3.3.1, and 45CSR§7-8.1]**

### **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. and 45CSR13 – R13-2038, Condition 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 45CSR4, 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.]**

- 3.4.4. The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility.

**[45CSR§30-5.1.c.]**

### 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. Except for the electronic submittal of the annual certification to the USEPA as required in 3.5.5 below, 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 annual certification to the USEPA shall be submitted in electronic format only. It shall be submitted by e-mail to the following address: [R3\\_APD\\_Permits@epa.gov](mailto:R3_APD_Permits@epa.gov). 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. Greenhouse Gas Reporting Requirements. When applicable, as determined in permit section 3.1., greenhouse gas emissions shall be reported pursuant to 45CSR§42-4. as follows:

a. In accordance with a reporting cycle provided by the Secretary, affected sources shall report to the Secretary the quantity of all greenhouse gases emitted above *de minimis* amounts in the years specified by the Secretary.

**[45CSR§42-4.1., State-Enforceable only.]**

- b. Affected sources shall only be required to report annual quantities of anthropogenic non-mobile source greenhouse gases emitted at the stationary source, and shall not be required to report biogenic emissions of greenhouse gases.

**[45CSR§42-4.2., State-Enforceable only.]**

- c. Reports of greenhouse gas emissions submitted to the Secretary under 45CSR§42-4. shall be signed by a responsible official and shall include the following certification statement: "I, the undersigned, hereby certify that the data transmitted to the West Virginia Department of Environmental Protection is true, accurate, and complete, based upon information and belief formed after reasonable inquiry.

**[45CSR§42-4.5., State-Enforceable only.]**

### **3.6. Compliance Plan**

- 3.6.1. No compliance plan was submitted since the permittee certified compliance with all current applicable requirements.

### **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. **40 CFR 63, Subpart M-MMM-National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.** Facilities that emit less than 10 TPY of any single HAP and less than 25 TPY of a combination of HAPS are exempt from this subpart per 40CFR§63.3881(b). Condition 4.1.16 of permit R13-2038 sets lower limits, thus exempting this source from this MACT.
- b. **40 CFR 64-Compliance Assurance Monitoring.** The Pre-Priming Application and Anti-Skid Application are subject to emissions limitations but do not utilize control devices to achieve compliance. All other sources utilize control devices to achieve compliance with PM emission limits but have pre-control device emissions less than that required to be considered a major source. Therefore, in accordance with 40CFR§64.2(a), CAM is not applicable to this facility.

#### 4.0 Source-Specific Requirements [Manufacturing Processes Requirements (All Emission Sources)]

##### 4.1. Limitations and Standards

- 4.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in subsections 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7 of 45CSR7.  
**[45CSR§7-3.1. and 45CSR13 - R13-2038, Condition 4.1.1.]**
- 4.1.2. No person shall cause, suffer, allow, or permit emissions of smoke and/or particulate matter into the open air from any storage structure associated with any manufacturing process that pursuant to 45CSR§7-5.1 is required to have a full enclosure and be equipped with a particulate matter control device.  
**[45CSR§7-3.7. and 45CSR13 - R13-2038, Condition 4.1.2.]**
- 4.1.3. No person shall cause, suffer, allow, or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found in 45CSR7.

Emission Point ID	Emission Unit Description	Hourly PM Limit
001	Primary Interior Lining	21.2 pounds per hour
002	Exterior Prime	21.2 pounds per hour
003	Secondary Interior Lining	21.2 pounds per hour
004	Finish Booth	21.2 pounds per hour
006	Stencil Booth	21.2 pounds per hour
007	Final Touch Up	21.2 pounds per hour

**[45CSR§7-4.1. and 45CSR13 - R13-2038, Condition 4.1.3.)]**

- 4.1.4. No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.  
**[45CSR§7-5.1. and 45CSR13 - R13-2038, Condition 4.1.4.]**
- 4.1.5. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.  
**[45CSR§7-5.2. and 45CSR13 - R13-2038, Condition 4.1.5.]**
- 4.1.6. Due to unavoidable malfunction of equipment, emissions exceeding those provided for in this rule may be permitted by the Director for periods not to exceed ten (10) 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§7-9.1. and 45CSR13 - R13-2038, Condition 4.1.6.]**

4.1.7. No owner or operator of a miscellaneous metal parts and products coating line that applies multiple coatings, all of which are subject to the same numerical emission limitation in 45CSR§21-19.3a., during the same day (e.g., all coatings used on the line are subject to 0.42 kg/L [3.5 lb/gal]), shall apply coatings on that line during any day whose daily-weighted average VOC content calculated in accordance with Section 4.4.8. of this permit exceeds the coating VOC content limit corresponding to the category of coating used.

**[45CSR§21-19.4. and 45CSR13 - R13-2038, Condition 4.1.7.]**

4.1.8. An owner or operator of a miscellaneous metal parts and products coating line subject to 45CSR21, Section 19. and complying with 45CSR§21-19.4. by daily-weighted averaging shall comply with the certification, recordkeeping, and reporting requirements in Sections 4.4.6. and 4.4.7. of this permit.

**[45CSR§21-19.7. and 45CSR13 - R13-2038, Condition 4.1.9.]**

4.1.9. Maximum total emissions of Volatile Organic Compounds (VOC) from the facility shall not exceed 245 TPY.

**[45CSR13 - Permit R13-2038, Condition 4.1.10.]**

4.1.10. Particulate Matter (PM) emissions from the Weld Seam Blast (Emission Unit ID 005-01) shall be vented through a cyclone (Control Device ID 0008) prior to release to the atmosphere at emission point ID 008 and shall not exceed 4.43 pounds per hour (lb/hr) and 9.18 TPY based on operating 4,144 hours per year. Compliance with this limit shall demonstrate compliance with the less stringent limitation of 45CSR§7-4.1.

**[45CSR13 - R13-2038, Condition 4.1.11. and 45CSR§7-4.1. (*Weld Seam Blast*)]**

4.1.11. Particulate Matter (PM) emissions from the Auto Blast, Hand Blast, and Finish Blast (Emission Unit IDs 005-03, 005-04, and 005-05) shall be vented through a baghouse (Control Device ID 000A & 000B) prior to release to the atmosphere at emission point ID 00A and shall not exceed 16.34 lb/hr and 33.9 TPY based on operating 4,144 hours per year. Compliance with this limit shall demonstrate compliance with the less stringent limitation of 45CSR§7-4.1.

**[45CSR13 - R13-2038, Condition 4.1.12. and 45CSR§7-4.1. (*Auto Blast, Hand Blast, Finish Blast*)]**

4.1.12. Particulate Matter (PM) emissions from the Pangborn Interior Blast (Emission Unit ID 005-02) shall be vented through a baghouse (Control Device ID No. 0009) prior to release to the atmosphere at Emission Point ID 009 and shall not exceed 28.1 lb/hr and 58.22 TPY based on 4,144 hours per year of operation. Compliance with this limit shall demonstrate compliance with the less stringent limitation of 45CSR§7-4.1.

**[45CSR13 - R13-2038, Condition 4.1.13. and 45CSR§7-4.1. (*Panghorn Interior Blast*)]**

4.1.13. The following provisions are considered to be operating limits to demonstrate compliance with the particulate matter emission limits:

- a. The permittee shall use no more than 1,477 pounds of grit/hour in the Weld Seam Blast (008) operations.
- b. The permittee shall use no more than 14,335 pounds of grit/hour in the Pangborn Interior Blast (009) operations.
- c. The permittee shall use no more than 152,681 pounds of grit/hour in the Auto Blast, Hand Blast, and Finish Blast (00A) operations.

**[45CSR13 - R13-2038, Condition 4.4.10.]**

4.1.14. The daily weighted average of all coatings (with exception to pre-priming operations) shall not exceed 3.5 lb VOC/gallon coating. Note: VOC content values are expressed in units of mass of VOC (kg, lb) per volume of coating (liter [L], gallon [gal]), minus water and exempt compounds, as applied.

**[45CSR13 - R13-2038, Condition 4.1.14. (001, 002, 003, 004, 006, 007, & 00B Railcar Coating)]**

4.1.15. The VOC content of primer used in pre-priming operations shall not exceed 3.5 lb VOC/gallon. Note: VOC content values are expressed in units of mass of VOC (kg, lb) per volume of coating (liter [L], gallon [gal]), minus water and exempt compounds, as applied.

**[45CSR13 - R13-2038, Condition 4.1.15.]**

4.1.16. The facility-wide emission rate of the following HAPs, shall not equal or exceed, on a per-HAP basis, 9.4 tons per year and/or on an aggregate basis, 24.4 tons per year:

HAP	CAS No.	HAP	CAS No.
Cumene	98-82-8	Ethylbenzene	100-41-4
Formaldehyde	50-00-0	Methanol	67-56-1
Methyl Isobutyl Ketone (MIBK)	108-10-1	Naphthalene	91-20-3
Styrene	100-42-5	Toluene	108-88-3
Glycol Ethers	0	Xylenes (isomers and mixture, m-xylene, p-xylene, o-xylene)	1330-20-7, 108-38-3, 106-42-3, 95-47-6
Methyl Chloroform (1,1,1-Trichloroethane)	71-55-6		

Use of any surface coating containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP and not listed above shall be in accordance with the following:

- a. The permittee shall notify the Director in writing of the surface coating to be used and the HAP(s) contained therein within thirty (30) days after the initial use of the surface coating. Additionally, an MSDS sheet for the surface coating shall be supplied at this time to the Director.
- b. The use of the surface coating shall be incorporated into the record keeping requirements contained herein.
- c. The emission rate of the HAP(s) contained within the surface coating shall not equal or exceed, on a per-HAP basis, 9.4 tons per year. Compliance with the annual emission limits shall be determined using a 12-month rolling total. A 12-month rolling total shall mean the sum of the measured quantity at any given time for the previous twelve (12) consecutive calendar months.

For the purposes of this permit, surface coatings shall be defined as a material applied onto, or impregnated into, a substrate for protective, decorative, or functional purposes. Such materials include, but are not limited to, stains, thinners, solvents, sealers, varnishes, paints, primers, catalysts, acrylics, lacquers, and temporary protective coatings, or combinations of the above materials as applied.

**[45CSR13 - R13-2038, Condition 4.1.16.]**

4.1.17. The facility-wide emission rate of Formaldehyde (CAS No. 50-00-0) shall not exceed 1,000 pounds per year. Compliance with the annual emission limit shall be determined using a 12-month rolling total. A 12-month

rolling total shall mean the sum of the measured quantity at any given time for the previous twelve (12) consecutive calendar months.

Use of any surface coating containing any toxic air pollutant (TAP) as defined by West Virginia Legislative Rule 45CSR27, Section 2.10., other than Formaldehyde, shall be in accordance with the following:

- a. The permittee shall notify the Director in writing of the surface coating to be used and the TAP(s) contained therein within thirty (30) days of the use of the surface coating. Additionally, an MSDS sheet for the surface coating shall be supplied at this time to the Director.
- b. The use of the surface coating shall be incorporated into the record keeping requirements contained herein.
- c. The emission rate of the TAP(s) contained within the surface coating shall not equal or exceed, on a per-TAP basis, the annual limits contained in 45CSR27, Table A. Compliance with the annual emission limits shall be determined using a 12-month rolling total.

**[45CSR13 - R13-2038, Condition 4.1.17.]**

- 4.1.18. 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.

**[45CSR§13-5.11. and 45CSR13 - R13-2038, Condition 4.1.18.]**

- 4.1.19. Any stack serving any process source operation or air pollution control equipment on any process source operation shall contain flow straightening devices or a vertical run of sufficient length to establish flow patterns consistent with acceptable stack sampling procedures.

**[45CSR§7-4.12.]**

## **4.2. Monitoring Requirements**

- 4.2.1. For the purpose of determining compliance with the opacity limits of Section 4.1.1. of this permit, the permittee shall conduct visible emission checks and/or opacity monitoring and recordkeeping for all emission sources subject to an opacity limit.

The visible emission check shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40CFR Part 60, Appendix A, Method 22 or from the lecture portion of the 40CFR Part 60, Appendix A, Method 9 certification course.

Visible emission checks shall be conducted at least once per calendar month with a maximum of forty-five (45) days between consecutive readings. These checks shall be performed at each source (stack, transfer point, fugitive emission source, etc.) for a sufficient time interval, but no less than one (1) minute, to determine if any visible emissions are present. Visible emission checks shall be performed during periods of normal facility operation and appropriate weather conditions.

If visible emissions are present at a source(s) for three (3) consecutive monthly checks, the permittee shall conduct an opacity reading at that source(s) using the procedures and requirements of 45CSR7A as soon as practicable, but within seventy-two (72) hours of the final visual emission check. A 45CSR7A observation at a source(s) restarts the count of the number of consecutive readings with the presence of visible emissions.

**[45CSR13 - R13-2038, Condition 4.2.1.]**

- 4.2.2. The permittee shall maintain and operate the baghouse systems (009 & 00A) in accordance with good engineering practices and manufacturer's specifications. This shall include the installation of broken bag detectors or pressure-sensing devices/switches to monitor filter condition, prompt replacement of broken bags, and weekly inspections to ensure proper operation.

**[45CSR13 - R13-2038, Condition 4.2.2.]**

- 4.2.3. The permittee shall maintain and operate the cyclone (008) in accordance with good engineering practices and manufacturer's specifications. Weekly inspections of the cyclone shall be conducted to ensure proper operation.

**[45CSR13 - R13-2038, Condition 4.2.3.]**

- 4.2.4. To demonstrate compliance with particulate matter emission limitations for Railcar & MMPP Coating (001, 002, 003, 004, 006, & 007) operations listed in Section 4.1.3. of this permit, the permittee shall maintain and operate the spray booths and filter systems in accordance with good engineering practices and manufacturer's specifications. This shall include the prompt replacement of plugged or broken filters and weekly inspections to insure proper operation. Upon detection of a defect or a deterioration in quality of any of the equipment, repair or replacement of the affected equipment shall take place prior to any further surface coating operations that utilize said affected equipment.

**[45CSR13 - R13-2038, Condition 4.2.4.]**

### **4.3. Testing Requirements**

- 4.3.1. To demonstrate compliance with limitations on the daily weighted average of all coatings (with exception of coatings used in pre-priming operations) as specified in Sections 4.1.7. and 4.1.14. of this permit, the permittee shall use the procedures specified in 45CSR§21-43.1. "Test Methods and Compliance Procedures: Alternative Compliance Methods for Surface Coating." and all other applicable requirements of 45CSR21.

**[45CSR§21-19.6. and 45CSR13 - R13-2038, Conditions 4.3.1. and 4.1.8.]**

- 4.3.2. To determine compliance with the particulate matter emission standards set forth under Section 4.1.10., 4.1.11., and 4.1.12. of this permit, and the visible emission standards of 45CSR7, the permittee shall conduct tests in accordance with the Mass Emission Test Procedures that are described in 45CSR§7A-3 "Compliance Test Procedures for 45CSR7" for each emission point upon request by the Director. At least thirty (30) days prior to the tests, the permittee shall submit a test protocol for approval by the Director. The test protocol, with any appropriate refinements, shall be resubmitted to the Director prior to each subsequent test or group of tests.

**[45CSR13 - R13-2038, Condition 4.3.2. and 45CSR30-5.1.c.]**

### **4.4. Recordkeeping Requirements**

- 4.4.1. Record of Maintenance of Air Pollution Control Equipment. For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

**[45CSR13 - R13-2038, Condition 4.4.2.]**

4.4.2. Record of Malfunctions of Air Pollution Control Equipment. For all air pollution control equipment listed in Section 1.0, 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 - R13-2038, Condition 4.4.3.]**

4.4.3. The permittee shall maintain records of all monitoring data required by Section 4.2.1. documenting the date and time of each visible emission check, the emission point or equipment/source identification number, the name or means of identification of the observer, the results of the check(s), whether the visible emissions are normal for the process, and, if applicable, all corrective measures taken or planned. The permittee shall also record the general weather conditions (i.e. sunny, approximately 80°F, 6 - 10 mph NE wind) during the visual emission check(s). An example form is supplied as Appendix A. Should a visible emission observation be required to be performed per the requirements specified in 45CSR7A, the data records of each observation shall be maintained per the requirements of 45CSR7A. For an emission unit out of service during the normal monthly evaluation, the record of observation may note "out of service" (O/S) or equivalent.

**[45CSR13 - R13-2038, Condition 4.4.4.]**

4.4.4. To demonstrate compliance with requirements to minimize emissions of fugitive particulate matter, the following procedure shall be applied:

- a. Atmospheric vents and manufacturing process operations at the facility which have the potential to generate fugitive particulate matter shall be observed on a daily basis, during the course of normal operation, for fugitive particulate matter emissions. If a fugitive particulate problem is observed, appropriate corrective action(s) shall be taken to minimize emissions of fugitive particulate matter.
- b. Records concerning the date and time of the visual observations and the corrective actions taken shall be maintained on-site for no less than five (5) years.

**[45CSR13 - R13-2038, Condition 4.4.5.]**

- 4.4.5. The permittee shall maintain records indicating the use of any dust suppressants or any other suitable dust control measures applied at the facility.

**[45CSR13 - R13-2038, Condition 4.4.6.]**

- 4.4.6. Upon startup of a new coating line or operation or upon changing the method of compliance for an existing subject coating line or operation from the use of complying coatings or control devices to daily-weighted averaging, the owner or operator of the subject coating line or operation shall certify to the Director that the coating line or operation is or will be in compliance with this section on and after the initial startup date. Such certification shall include:

- a. The name and location of the facility;
- b. The address and telephone number of the person responsible for the facility;
- c. Identification of subject sources;
- d. The name and identification number of each coating line or operation which will comply by means of daily-weighted averaging;
- e. The instrument or method by which the owner or operator will accurately measure or calculate the volume of each coating (minus water and exempt compounds), as applied, used each day on each coating line or operation;
- f. The method by which the owner or operator will create and maintain records each day as required in 45CSR§21-4.4.b.;
- g. An example of the format in which the records required in 45CSR§21-4.4.b. will be kept;
- h. Calculation of the daily-weighted average, using the procedure in section 4.4.8. of this permit, for a day representative of current or projected maximum production levels; and
- i. The time at which the facility's "day" begins if a time other than midnight local time is used to define a "day".

**[45CSR§§21-4.4.a. and 45CSR13 - R13-2038, Condition 4.4.7.]**

- 4.4.7. On and after the initial startup date, the owner or operator of a coating line or operation referenced in this section and complying by means of daily-weighted averaging shall collect and record all of the following information each day for each coating line or operation and maintain the information at the facility for a period of 3 years:

- a. The name and identification number of each coating, as applied, on each coating line or operation;
- b. The mass of VOC per volume (minus water and exempt compounds) and the volume of each coating (minus water and exempt compounds), as applied, used each day on each coating line or operation; and
- c. The daily-weighted average VOC content of all coatings, as applied, on each coating line or operation calculated according to the procedure in section 4.4.8. of this permit.

**[45CSR§§21-4.4.b. and 45CSR13 - R13-2038, Condition 4.4.7.]**

- 4.4.8. The daily-weighted average VOC content, in units of mass of VOC per unit volume of coating, minus water and exempt compounds, as applied, of the coatings used on a day on a coating line or operation shall be calculated using the following equation:

$$VOC_w = \frac{\sum_{i=1}^n V_i C_i}{V_T}$$

where:

$VOC_w$  = The daily-weighted average VOC content of the coatings, as applied, used on a coating line or operation in units of kilograms of VOC per liter of coating (kg VOC/L) (pounds of VOC per gallon of coating [lb VOC/gal]), minus water and exempt compounds;

$n$  = The number of different coatings, as applied, each day on a coating line or operation;

$V_i$  = The volume of each coating, as applied, each day on a coating line or operation in units of L (gal), minus water and exempt compounds; and

$C_i$  = The VOC content of each coating, as applied, each day on a coating line or operation in units of kg VOC/L of coating (lb VOC/gal), minus water and exempt compounds; and

$V_T$  = The total volume of all coating, as applied, each day on a coating line or operation in units of L (gal), minus water and exempt compounds.

**[45CSR§21-43.1. and 45CSR13 - R13-2038, Condition 4.4.8.]**

- 4.4.9. Compliance with Section 4.1.14. of this permit shall include the following:
- The permittee shall provide the Director or a duly authorized representative of the Director with proof of VOC content of the primer used in the pre-priming operations upon request.
  - The permittee shall keep records of the amount of primer used in the pre-priming operations and shall include the emissions from such in the total VOC emission calculations for the facility as limited by Section 4.1.9. of this permit.

**[45CSR13 - R13-2038, Condition 4.4.9.]**

- 4.4.10. For the purpose of determining compliance with the particulate matter emissions limits in Sections 4.1.10., 4.1.11., and 4.1.12., as well as the abrasive grit usage limits set forth in Section 4.1.13., the permittee shall maintain monthly records of the amount of abrasive grit used and the hours of operation for Weld Seam Blast (008), Pangborn Interior Blast (009), and Auto Blast, Hand Blast & Finish Blast (00A) operations.

**[45CSR13 - R13-2038, Condition 4.4.11.]**

- 4.4.11. For each calendar month, the permittee shall prepare and maintain a summary of average hourly emissions for Pangborn Interior Blast operations (009), as well as average hourly, monthly, and aggregated total emissions of particulate matter for the previous twelve (12) months, for Weld Seam Blast (008), and Auto Blast, Hand Blast & Finish Blast (00A) operations. Said emissions summary shall be based on estimated emissions of particulate

matter, utilizing the daily records of grit usage, hours of operation, and the following methodology derived from the "Air Quality Permits" handbook<sup>(1)</sup>:

- a. The hourly emissions of particulate matter shall be calculated according to:

$$R = EF * FR * (1 - n),$$

Where:

R = Estimated controlled particulate matter emissions (lb PM/hr),

EF = Appropriate emission factor from Table 3-2 of the "Air Quality Permits" handbook (lb PM/lb abrasive grit used),

FR = Hourly abrasive grit usage (lb grit/hr) [total aggregated grit usage divided by total aggregated hours of operation for that calendar month],

n = Efficiency of control device (decimal value).

- b. Monthly particulate matter emissions estimates for Weld Seam Blast (008), and Auto Blast, Hand Blast & Finish Blast (00A) operations shall be based on the calculated hourly emission rate, according to the procedure mentioned above, and the aggregated total hours of operation for that particular calendar month.

Note: <sup>(1)</sup>A copy of the pertinent sections of the "Air Quality Permits" handbook has been placed in the company's file for reference.

**[45CSR13 - R13-2038, Condition 4.4.12.]**

- 4.4.12. To demonstrate compliance with Sections 4.2.2., 4.2.3., and 4.2.4. of this permit, the permittee shall keep records of weekly inspections, any malfunctions or times the baghouse systems, the cyclone, and the filter systems are inoperable, along with any corrective actions taken.

**[45CSR13 - R13-2038, Condition 4.4.13.]**

- 4.4.13. To demonstrate compliance with Section 4.1.16. of this permit, the permittee shall estimate facility-wide HAP emissions by maintaining a list of paints and thinners used at the facility, usage records, HAP constituents and HAP content present in the coatings. Compliance with the annual emission limits shall be determined using a 12-month rolling total.

**[45CSR§30-5.1.c.]**

## **4.5. Reporting Requirements**

- 4.5.1. Any violation(s) of the allowable visible emission requirement for any emission source discovered during observations using 45CSR7A must be reported in writing to the Director of the Division of Air Quality as soon as practicable, but within ten (10) calendar days of the occurrence and shall include, at a minimum, the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.

**[45CSR13 - R13-2038, Condition 4.5.1.]**

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- 4.5.2. The owner or operator of a subject coating line or operation referenced in this section shall notify the Director in the following instances:
- a. Any record showing noncompliance with the applicable daily-weighted average requirements shall be reported by sending a copy of the record to the Director within 30 days following the occurrence, except as provided in section 9.3 of 45CSR21.
  - b. At least 30 calendar days before changing the method of compliance from daily-weighted averaging to the use of complying coatings or control devices, the owner or operator shall comply with all requirements of section 4.3.a. or section 4.5.a. of 45CSR21, respectively. Upon changing the method of compliance from daily-weighted averaging to the use of complying coatings or control devices, the owner or operator shall comply with all requirements of 45CSR21 applicable to the coating line or operation referenced in section 4.4. of 45CSR21.

**[45CSR§21-4.4.c. and 45CSR13 - R13-2038, Condition 4.5.2.]**

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

- 4.6.1. No compliance plan was submitted since the permittee certified compliance with all applicable requirements.



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CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached \_\_\_\_\_, representing the period beginning \_\_\_\_\_ and ending \_\_\_\_\_, and any supporting documents appended hereto, is true, accurate, and complete.

Signature<sup>1</sup> \_\_\_\_\_  
(please use blue ink) Responsible Official or Authorized Representative Date

Name and Title \_\_\_\_\_  
(please print or type) Name Title

Telephone No. \_\_\_\_\_ Fax No. \_\_\_\_\_

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- <sup>1</sup> This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:
- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
    - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
    - (ii) the delegation of authority to such representative is approved in advance by the Director;
  - b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
  - c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or
  - d. The designated representative delegated with such authority and approved in advance by the Director.