

West Virginia Department of Environmental Protection
Division of Air Quality

Earl Ray Tomblin
Governor

Randy C. Huffman
Cabinet Secretary

Permit to Operate



Pursuant to
Title V
of the Clean Air Act

Issued to:
Wheeling Corrugating Company
Beech Bottom Plant
R30-00900004-2012

John A. Benedict
Director

Issued: October 10, 2012 • Effective: October 24, 2012
Expiration: October 10, 2017 • Renewal Application Due: April 10, 2017

Permit Number: **R30-00900004-2012**
Permittee: **Wheeling Corrugating Company**
Facility Name: **Beech Bottom Plant**
Mailing Address: **1134 Market Street, Wheeling, West Virginia 26003**

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.

Facility Location:	Beech Bottom, Brooke County, West Virginia
Mailing Address:	1134 Market Street, Wheeling, West Virginia, 26003
Telephone Number:	304-234-2662
Type of Business Entity:	Corporation
Facility Description:	The Beech Bottom plant manufactures coated steel coils and formed steel siding and decking products.
SIC Codes:	3479
UTM Coordinates:	528.81 km Easting • 4452.42 km Northing • Zone 17

Permit Writer: Rex Compston, P.E.

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.

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
Boilers					
003-01	Boiler #1	Cleaver Brooks natural gas boiler	1960	25.2 MMBTU/hr	None
003-02	Boiler #2	Cleaver Brooks natural gas boiler	1960	25.2 MMBTU/hr	None
003-03	Boiler #3	Cleaver Brooks natural gas boiler	1960	25.2 MMBTU/hr	None
003-04	Boiler #4	Cleaver Brooks natural gas boiler	1960	25.2 MMBTU/hr	None
Coating Line #1					
001-01	Surface Cleaning Section	Three hot rinse tanks, cold rinse tank, phosphoric acid rinse tank, zinc phosphating tank, cleaner, brush machine, and pre-clean tanks.	1960	N/A	None
001-02	Drying Oven	Natural gas fired oven to remove water from steel strip after exiting the cleaning tanks and chrome roll coater and prior to application of the primer coat.	1960	4 MMBTU/hr	None
1S	11E	CCL #1 Primer coating application room	2005	12 gal/hr	3C
2S	11E	CCL #1 Finish coating application room	2005	58 gal/hr	3C
3S	11E	CCL #1 Primer Quench	2005	16,200 gal/hr	3C
4S	11E	CCL #1 Finish Quench	2005	16,200 gal/hr	3C
7S	11E	CCL #1 Primer Curing Oven	2005	(3) 5 MMBTU/hr	3C
8S	11E	CCL #1 Finish Curing Oven	2005	(3) 5 MMBTU/hr	3C
Coating Line #2					
008/1	Stack P15	CCL #2-Surface Treatment. The seven-stage surface treatment section consists of Stage 1 – alkaline sprays, Stage 2 – cold water brushing, Stage 3 – alkaline sprays, Stage 4 – hot water spray rinse, Stage 5 – phosphoric acid sprays, Stage 6 – hot water spray rinse, and Stage 7 – hot water spray rinse	2002	Exhaust fan rated at 5000 acfm	None
	Stack P18			Exhaust fan rated at 6000 acfm	

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
008/2	Stack P16	CCL#2-Drying Oven. Natural gas fired oven to remove water from steel strip after exiting the surface treatment tanks and chemical roll coater and prior to the application of coating.	2002	6 MMBTU/hr (Exhaust fan rated at 6500 acfm)	None
008/3	Stack P17	CCL#2-Coater. Top and bottom roll coater to apply coating to steel strip.	2002	38 gal/hr	CO3
008/4	Stack P17	CCL#2-Curing Oven. Natural gas fired oven to cure coating onto steel strip.	2002	12 MMBTU/hr	CO3
008/5	Stack P17	CCL#2-Quench Tank. Water sprays applied to cool steel strip exiting the curing oven.	2002	N/A	CO3
Miscellaneous Plant Operations					
006-01	Roads and Parking Areas	Facility paved roads and parking lots.	1960	N/A	None
006-03	Roll Forming	Roll forming	1960	N/A	None
Control Devices					
3C	11E	CCL #1 Regenerative Thermal Oxidizer	2005	(2) 9 MMBTU/hr	N/A
CO3	17E	CCL #2 Regenerative Thermal Oxidizer	2001	5 MMBTU/hr	N/A

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
R13-2379C	3/15/2005

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	PM	Particulate Matter
CEM	Continuous Emission Monitor	PM₁₀	Particulate Matter less than 10µm in diameter
CES	Certified Emission Statement	pph	Pounds per Hour
C.F.R. or CFR	Code of Federal Regulations	ppm	Parts per Million
CO	Carbon Monoxide	PSD	Prevention of Significant Deterioration
C.S.R. or CSR	Codes of State Rules	psi	Pounds per Square Inch
DAQ	Division of Air Quality	SIC	Standard Industrial Classification
DEP	Department of Environmental Protection	SIP	State Implementation Plan
FOIA	Freedom of Information Act	SO₂	Sulfur Dioxide
HAP	Hazardous Air Pollutant	TAP	Toxic Air Pollutant
HON	Hazardous Organic NESHAP	TPY	Tons per Year
HP	Horsepower	TRS	Total Reduced Sulfur
lbs/hr or lb/hr	Pounds per Hour	TSP	Total Suspended Particulate
LDAR	Leak Detection and Repair	USEPA	United States Environmental Protection Agency
m	Thousand	UTM	Universal Transverse Mercator
MACT	Maximum Achievable Control Technology	VEE	Visual Emissions Evaluation
mm	Million	VOC	Volatile Organic Compounds
mmBtu/hr	Million British Thermal Units per Hour		
mmft³/hr or mmcf/hr	Million Cubic Feet Burned per Hour		
NA or N/A	Not Applicable		
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		
NO_x	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. The permitted facility shall be constructed and operated in accordance with information filed in Permit Applications R13-2379, R13-2379A, R13-2379B, R13-2379C, and any amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to.

[Permit No. R13-2379 - (Condition C.3)]

3.2. Monitoring Requirements

- 3.2.1. N/A

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.

- d. The permittee shall submit a report of the results of the stack test within 60 days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
 1. The permit or rule evaluated, with the citation number and language.
 2. The result of the test for each permit or rule condition.
 3. A statement of compliance or non-compliance with each permit or rule condition.

[WV Code §§ 22-5-4(a)(14-15) and 45CSR13]

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.]

- 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.]

3.5. 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 57th Street SE
Charleston, WV 25304

Phone: 304/926-0475
FAX: 304/926-0478

If to the US EPA:

Associate Director
Office of Air Enforcement and Compliance
Assistance (3AP20)
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. 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.]

3.6. Compliance Plan

3.6.1. N/A

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. 45CSR17 – This rule does not apply, as stated in 45CSR§17-6.1. Sources that are subject to the fugitive particulate matter emission requirements of 45CSR7 are exempt from 45CSR17.
 - b. 45CSR21 – This rule is not applicable because the facility is not located in any of the affected counties.
 - c. 45CSR27 – This rule does not apply because this facility does not emit Toxic Air Pollutants above the benchmark values given in 45CSR27.
 - d. 45CSR29 – This rule is not applicable because the facility is not located in any of the affected areas specified in the regulation.
 - e. 40 C.F.R. Part 63, Subpart DDDDD Boiler MACT – The facility is not a major source of HAPs, therefore this subpart does not apply.
 - f. 40CFR Part 68 Risk Management Plan – This regulation is not applicable because none of the storage thresholds are triggered.
 - g. 40 C.F.R. Part 64 - Compliance Assurance Monitoring (CAM) - This facility does not have pollutant specific emissions units that have potential pre-control device emissions greater than major source thresholds, and therefore is not subject to Compliance Assurance Monitoring.

4.0 Boilers [emission unit ID(s): 003-01, 003-02, 003-03, 003-04]

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 fuel burning unit which is greater than ten (10) percent opacity based on a six minute block average.

[45CSR§2-3.1.]

- 4.1.2. No person shall cause, suffer, allow, or permit the discharge of particulate matter into the open air from all fuel burning units located at one plant, measured in terms of pounds per hour in excess of the amount determined as follows:

For Type 'b' fuel burning units, the product of 0.09 and the total design heat inputs for such units in million BTU's per hour, provided however that no more than six hundred (600) pounds per hour of particulate matter shall be discharged into the open air from all such units. The heat input of the four boilers is 25.2 million BTU's per hour each. The calculated allowable particulate emission rate for the four boilers is 2.27 lbs/hr each.

[45CSR§2-4.1.b.]

- 4.1.3. At all times, including periods of start-ups, shutdowns and malfunctions, owners and operators shall, to the extent practicable, maintain and operate any fuel burning unit(s) including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, visible emission observations, review of operating and maintenance procedures and inspection of the source.

[45CSR§2-9.2.]

- 4.1.4. No person shall cause, suffer, allow, or permit the discharge of sulfur dioxide into the open air from all stacks located at one plant, measured in terms of pounds per hour, in excess of the amount determined as follows:

For Type 'b' and Type 'c' fuel burning units, the product of 3.1 and the total design heat inputs for such units discharging through those stacks in million BTU's per hour. The heat input of the four boilers are 25.2 million BTU's per hour. The calculated allowable sulfur dioxide emission rate for the four boilers is 78.12 lbs/ hr each.

[45CSR§10-3.1.e.]

4.2 Monitoring Requirements

- 4.2.1. N/A

4.3 Testing Requirements

- 4.3.1. N/A

4.4 Recordkeeping Requirements

- 4.4.1. The owner or operator of a fuel burning unit(s) shall maintain records of the operating schedule, and the quality and quantity of fuel burned in each fuel burning unit as specified below:

For fuel burning unit(s) which burn only pipeline quality natural gas, such records shall include, but not be limited to, the date and time of start-up and shutdown, and the quantity of fuel consumed on a monthly basis.

[45CSR§2A-7.1.a.]

4.5. Reporting Requirements

4.5.1. N/A

4.6. Compliance Plan

4.6.1. N/A

5.0 Coating Line #1 [emission unit ID(s): 001-01, 001-02; emission point ID(s): 11E]

5.1. Limitations and Standards

- 5.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any incinerator which is twenty (20) percent opacity or greater, except as noted in 5.1.2.
[45CSR13, Permit No. R13-2379 – (Condition B.1.), 45CSR§6-4.3. (11E)]
- 5.1.2. The provisions of Condition 5.1.1 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 start-up.
[45CSR13, Permit No. R13-2379 -(Condition B.1.), 45CSR§6-4.4. (11E)]
- 5.1.3. 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 45CSR§§7-3.2, 3.3, 3.4, 3.5, 3.6, and 3.7.
[45CSR13, Permit No. R13-2379 - (Condition B.1. and B.3.), 45CSR§7-3.1. (001-02, 11E)]
- 5.1.4. The provisions of Condition 5.1.3 shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period.
[45CSR13, Permit No. R13-2379 - (Condition B.1. and B.3.), 45CSR§7-3.2 (001-02, 11E)]
- 5.1.5. No person shall cause, suffer, allow or permit particulate matter to be discharged from any incinerator into the open air in excess of the quantity determined by use of the following formula:

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

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

Table I: Factor, f, for Determining Maximum Allowable Particulate Emissions

Incinerator Capacity	Factor F
A. Less than 15,000 lbs./hr	5.43

The capacity of the incinerator is 770 lbs/hr for 3C. The corresponding allowable particulate matter emission rate for Coil Coating Line #1 type A incinerators is 2.09 lbs/hr for the regenerative thermal oxidizer (3C).

[45CSR13, Permit No. R13-2379 - (Condition B.1. and B.2.), 45CSR§6-4.1. (11E)]

- 5.1.6. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of the rule. The process weight rate for Coating Line #1 is 45,660 lbs./hr. The corresponding allowable particulate matter emission rate for Coil Coating Line #1 a type "b" source from Table 45-7A is interpolated to be 29.7 lb./hr.
[45CSR13, Permit No. R13-2379 - (Condition B.1. and B.3.), 45CSR§7-4.1. (Coating Line #1)]

- 5.1.7. No person shall cause, suffer, allow or permit the emission into the open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 parts per million by volume from existing source operations, except as provided in 45CSR§§10-4.1.a through 4.1.e.
[45CSR§10-4.1. (001-02, 11E)]
- 5.1.8. The average combustion temperature of the regenerative thermal oxidizer shall be reduced to 3-hour block averages, and in any 3-hour period must not fall below 1,450 degrees Fahrenheit.
[45CSR13, Permit No. R13-2379 - (Condition B1., B.5., and B.7.), 45CSR16, 45CSR34, 40CFR§60.465(b)(2), 40CFR§63.5160(d)(3)(i)(B), and 40CFR§63.5121(a). (3C)]
- 5.1.9. For each prime coat operation, each finish coat operation, and each prime and finish coat operation combined when the finish coat is applied wet on wet over the prime coat and both coatings are cured simultaneously, the Permittee shall not cause to be discharged into the atmosphere more than:
- a. 0.14 kg VOC/l of coating solids applied for each calendar month for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or
 - b. 10 percent of the VOC's applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency.
- [45CSR13, Permit No. R13-2379 - (Condition B.1. and B.5.), 45CSR16, 40CFR§60.460(a), 40CFR§60.462. (11E)]**
- 5.1.10. The Permittee must limit organic HAP emissions to the level specified:
- a. No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction); or
 - b. No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or
 - c. If you use an oxidizer to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 percent.

[45CSR13, Permit No. R13-2379 - (Condition B.1. and B.7.), 45CSR34, 40CFR§63.5120(a). (11E)]

5.1.11. Emissions from the regenerative thermal oxidizer (3C) shall not exceed the following:

	RTO (3C)	
	lb/hr	tpy
PM	1.6	7.01
CO	4.03	17.65
NO _x	5.16	22.6
SO ₂	0.028	0.12
VOC	11.02	48.27
Methyl Isobutyl Ketone	1.04	1.46
Isophorone	2.09	2.93
Ethylbenzene	1.38	1.94
Formaldehyde	0.26	0.37
Hexane	0.002	0.008
Cumene	0.26	0.37
Napthalene	1.47	2.07
Xylene	4.63	6.51

[45CSR13, Permit No. R13-2379 -(Condition A.6.) (11E)]

5.1.12. A regenerative thermal oxidizer, identified in permit application R13-2379C as 3C, shall be installed, maintained, and operated so as to achieve a minimum 98.00% destruction efficiency in the control of Volatile Organic Compound (VOC) emissions from the Primer Oven (7S), Finishing Oven (8S), Primer Coater (1S), Primer Quench Tank (3S), Finish Coater (2S) and Finish Quench Tank (4S).

[45CSR13, Permit No. R13-2379 -(Condition A.7. and B.1.), 45CSR16, 40CFR§60.465(b)(1). (11E)]

5.1.13. The RTO (3C) shall be in operation at all times when the equipment listed in Condition 5.1.12 are in operation and shall not be by-passed, disconnected, or otherwise rendered ineffective in the control of VOCs. The permittee shall record any and all times when a violation of this condition occurs. The certified record shall contain, at a minimum, the amount of time the coating line was in operation without utilizing the thermal oxidizer and the cause for the shutdown.

The thermal oxidizer shall burn only natural gas as its supplementary fuel source. Alternative fuels may be used only after receiving prior written approval from the Director.

[45CSR13, Permit No. R13-2379 -(Condition A.8.) (3C)]

5.1.14. The maximum amount of natural gas fuel combusted in the following sources shall not exceed 48,000 cubic foot per hour nor 420,480,000 cubic feet per year:

Identification	Description
7S	Primer Oven
8S	Finishing Oven
3C	RTO

[45CSR13, Permit No. R13-2379 -(Condition A.9.) (3C, 7S, 8S)]

- 5.1.15. Use of any surface coating containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP and not listed below shall be in accordance with the following:
- The permittee shall notify the Director in writing of the surface coating to be used and the HAP(s) contained therein within thirty (30) days of the use of the surface coating. Additionally, an MSDS sheet for the surface coating shall be supplied at this time to the Director.
 - The use of the surface coating shall be incorporated into the record keeping requirements contained herein.

HAP	CAS Number	HAP	CAS Number
Cumene	98828	Xylene	1330207
Ethyl Benzene	100414	Isophorone	78591
Methyl Isobutyl Ketone	108101	Naphthalene	91203
Formaldehyde	50000		

[45CSR13, Permit No. R13-2379 -(Condition A.10.)]

- 5.1.16. The coater rooms shall be constructed in order to achieve 100 percent capture efficiency.
[45CSR13, Permit No. R13-2379 - (Condition A.11.)]
- 5.1.17. The permittee shall maintain records of the amount and type of coatings applied to the steel and VOC and HAP emissions for the coating lines.
[45CSR13, Permit No. R13-2379 - (Condition A.12.)]
- 5.1.18. 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.
[45CSR13, Permit No. R13-2379 - (Condition B.1. and B.3.), 45CSR§7-5.1]

5.2. Monitoring Requirements

- 5.2.1. Initially, monthly 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 facility operation for a sufficient time interval to determine if the unit has visible emissions using procedures

outlined in 40CFR60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40CFR60, Appendix A, Method 9 evaluation within seventy-two (72) hours. A Method 9 evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions. A record of each visible emission check required above shall be maintained on site for a period of no less than five (5) years. 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, and the name of the observer. Initially, the Method 22 test shall be performed once per month. If visible emissions are not identified from Method 22 during six (6) consecutive months, the emissions checks need only be once per quarter. If visible emissions are identified from Method 22 at any emission check, the Permittee must start over with another six (6) consecutive months of no visible emissions detected before going to quarterly monitoring.

[45CSR§30-5.1.c. (11E)]

- 5.2.2. Initially, monthly visual emission checks of each emission point subject to an opacity limit shall be conducted. For units emitting directly into the open air from points other than a stack outlet, visible emissions are to include visible fugitive dust emissions that leave the plant site boundaries. These checks shall be conducted during periods of facility operation for a sufficient time interval to determine if the unit has visible emissions using procedures outlined in 40CFR60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct an evaluation as outlined in 45CSR§7A-2.1.a, b within seventy-two (72) hours. A 45CSR§7A-2.1.a, b evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions. A record of each visible emission check required above shall be maintained on site for a period of no less than five (5) years. 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, and the name of the observer.

Initially, the Method 22 test shall be performed once per month. If visible emissions are not identified from Method 22 during six (6) consecutive months, the emission checks need only be once per quarter. If visible emissions are identified from Method 22 at any test, the Permittee must start over with another six (6) consecutive months of no visible emissions detected before going to quarterly monitoring.

[45CSR§7A-2.1.a, b (001-02)]

- 5.2.3. The permittee shall employ a regenerative thermal oxidizer to comply with the requirements of the standards in Condition 5.1.10 and demonstrate continuous compliance through monitoring of a thermal oxidizer combustion chamber temperature as provided below:
- a. Install, calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months; or the chart recorder, data logger, or temperature indicator must be replaced. You must replace the equipment either if you choose not to perform the calibration, or if the equipment cannot be calibrated properly. Each temperature monitoring device must be equipped with a continuous recorder. The device must have an accuracy of ± 1 percent of the temperature being monitored in degrees Celsius, or ± 1 Celsius, whichever is greater.
 - b. For an oxidizer other than a catalytic oxidizer, to demonstrate continuous compliance with the operating limit established according to Condition 5.1.8, the Permittee shall install the thermocouple or temperature sensor in the combustion chamber at a location in the combustion zone.
 - c. The temperature data shall be reduced to 3-hour block averages.

- d. Maintain the 3-hour average combustion temperature at or above 1,450 degrees Fahrenheit.

[45CSR13, Permit No. R13-2379 -(Condition B.1. and B.7.), 45CSR34, 40CFR§63.5150(a)(3), 40CFR§63.5121(a). (3C)]

- 5.2.4. The permittee shall comply with the requirements of the standards in Condition 5.1.10 through the use of a capture system and control device, and develop a capture system monitoring plan containing the information specified in paragraphs (a) and (b) below. The permittee shall monitor the capture system in accordance with paragraph (c) below. The monitoring plan shall be available for inspection by the permitting authority upon request.

- a. The monitoring plan must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.
- b. The plan also must specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the standards in Condition 5.1.10. The operating limits must represent the conditions indicative of proper operation and maintenance of the capture system.
- c. The permittee must conduct monitoring in accordance with the plan.

[45CSR13, Permit No. R13-2379 -(Condition B.1.), 45CSR34, 40CFR§63.5150(a)(4). (3C)]

- 5.2.5. The Permittee shall include all coating materials (as defined in 40CFR§63.5110) used in the affected source when determining compliance with Condition 5.1.10. To make this determination, the Permittee shall use at least one of the four compliance options listed below:

- a. *Use of “as purchased” compliant coatings:*

- 1. Each coating material used during the 12-month compliance period does not exceed 0.046 kg HAP per liter solids, as purchased. Compliance shall be shown by 40CFR§63.5170(a).

- b. *Use of “as applied” compliant coatings:*

- 1. Each coating material used does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. Compliance shall be shown by 40CFR§63.5170(b)(1).
- 2. Average of all coating materials used does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. Compliance shall be shown by 40CFR§63.5170(b)(2).

- c. *Use of a capture system and control device:*

- 1. Overall organic HAP control efficiency is at least 98 percent on a monthly basis for individual or groups of coil coating lines; or overall organic HAP control efficiency is at least 98 percent during initial performance test and operating limits are achieved continuously for individual coil coating lines; or oxidizer outlet HAP concentration is no greater than 20 ppmv and there is 100 percent capture efficiency during initial performance test and operating limits are achieved continuously for individual coil coating lines. Compliance shall be shown by 40CFR§63.5170(c).

- d. *Use of a combination of compliant coatings and control devices and maintaining an acceptable equivalent emission rate:*
 1. Average equivalent emission rate does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. Compliance shall be shown by 40CFR§63.5170(c).

The Permittee may apply any of the compliance options to an individual coil coating line, or to multiple lines as a group, or to the entire affected source. The Permittee may use different compliance options for different coil coating lines, or at different times on the same line. However, the Permittee may not use different compliance options at the same time on the same coil coating line. If the Permittee switches between compliance options for any coil coating line or group of lines, they shall document the switch as required by Condition 5.4.3, and the Permittee must report it in the next semiannual compliance report required in Condition 5.5.2.

[45CSR13, Permit No. R13-2379 - (Conditions B.1. and B.7.), 45CSR34, 40CFR§63.5170. (3C)]

- 5.2.6. Compliance with Condition 5.1.16 shall be shown by a pressure drop across the coating room of at least 0.007 inches H₂O. The Permittee shall take pressure drop measurements at least 1/shift.
[45CSR§30-5.1.c]

5.3. Testing Requirements

- 5.3.1. Compliance with 40CFR60, Subparts A and TT testing requirements for Coil Coating Line #1 shall be demonstrated as follows:
 - a. The owner or operator of an affected facility shall conduct a performance test for each calendar month for each affected facility according to the procedures in 40CFR§60.463.
 - b. Tests that are required by the Director to determine compliance with the destruction efficiency as set forth in Condition 5.1.12 of this permit shall be conducted in accordance with the methods as set forth below. The Director may require a different test method or approve an alternative method in light of any new technology advancements that may occur. Compliance testing shall be conducted at the maximum permitted operating conditions unless otherwise specified by the Director. Should the maximum permitted operating conditions allowed in this permit not be attainable during the initial compliance testing, then the facility shall be limited in operation to the maximum operating conditions attained during testing. The permittee shall again be required to perform such compliance testing when maximum permitted operating conditions are attainable. The maximum operating conditions attained during compliance testing shall be the maximum operating conditions allowed by this permit.
 - i. Tests to determine compliance with VOC emission limits shall be conducted in accordance with Method 25, or 25A as set forth in 40CFR60, Appendix A.
 - c. With regard to testing required by the Director, the permittee shall submit to the Director of Air Quality a test protocol detailing the proposed test methods, the date, and the time the proposed testing is to take place, as well as identifying the sampling locations and other relevant information. The test protocol shall include the procedure for the determination of the maximum unit capacity (maximum airflow through Regenerative thermal oxidizer (3C) and the operational constraint(s) placed on the system that shall not allow operation of 3C above this maximum capacity. The test protocol must be received by the Director no less than thirty (30) days prior to the date the testing is to take place. Test results shall be submitted to the Director within thirty (30) days after the stack testing completion date.

[45CSR13, Permit No. R13-2379 - (Condition B.1., B.5., B.8., and B.9.), 45CSR16, 40CFR§60.463. (3C)]

- 5.3.2. The permittee shall determine capture efficiency to meet the requirements of 40CFR§§63.5170(i)(2) through (3) and employ the procedures below:
- a. For an enclosure that meets the criteria for a PTE, the permittee may assume it achieves 100 percent capture efficiency. The permittee must confirm that the capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40 CFR part 51, appendix M (or an EPA approved alternative method), and that all exhaust gases from the enclosure are delivered to a control device.
 - b. The permittee may determine capture efficiency, CE, according to the protocols for testing with temporary total enclosures that are specified in Method 204A through F of 40CFR part 51, appendix M.

[45CSR13, Permit No. R13-2379 -(Condition B.1.), 45CSR34, 40CFR§63.5160(e). (3C)]

5.4. Recordkeeping Requirements

- 5.4.1. Compliance with the particulate matter and sulfur dioxide emission limitation established Coil Coating Line #1 shall be demonstrated as follows:
- a. Demonstrate that natural gas was used as the only fuel
 - b. Continual compliance shall be demonstrated by maintaining records of fuel usage.

[45CSR§30-5.1.c. (3C)]

- 5.4.2. Compliance with 40 CFR 60, Subpart TT monitoring and recordkeeping requirements for Coil Coating Line #1 shall be demonstrated as follows:
- a. The permittee shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with Condition 5.1.9. This device shall have an accuracy of $\pm 2.5^{\circ}\text{C}$ or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. Each owner or operator shall also record all periods (during actual coating operations) in excess of three hours during which the average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28°C (50°F) below the temperature at which compliance with Condition 5.1.9 was demonstrated during the most recent measurement of incinerator efficiency required by 40CFR§60.8. The records required by 40CFR§60.7 shall identify each such occurrence and its duration.
 - b. At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate, any affected facility including associated air pollution equipment in a manner consistent with good air pollution control practice for minimizing emissions.
 - c. Each owner or operator subject to the provisions of 40 CFR 60, Subpart TT shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, the permittee shall maintain, at the source, daily records of the incinerator combustion temperature.

[45CSR13, Permit No. R13-2379 - (Condition B.1. and B.5.), 45CSR16, 40CFR§60.464(c), 40CFR§60.465(e), Subpart A, 40CFR§60.11(d)]

- 5.4.3. 40CFR§63.5190(a) - The permittee shall maintain records specified in this Condition in accordance with 40CFR§63.10(b)(1):
- a. Records of the coating lines on which you used each compliance option and the time periods (beginning and ending dates and times) the permittee used each option.
 - b. Records specified in 40CFR§63.10(b)(2) of all measurements needed to demonstrate compliance with 40 C.F.R. 63, Subpart SSSS, including:
 1. Continuous emission monitor data in accordance with 40CFR§63.5150(a)(2);
 2. Control device and capture system operating parameter data in accordance with 40CFR§§63.5150(a)(1), (3), and (4);
 3. Organic HAP content data for the purpose of demonstrating compliance in accordance with 40CFR§63.5160(b);
 4. Volatile matter and solids content data for the purpose of demonstrating compliance in accordance with 40CFR§63.5160(c);
 5. Overall control efficiency determination or alternative outlet HAP concentration using capture efficiency tests and control device destruction or removal efficiency tests in accordance with 40CFR§§63.5160(d), (e), and (f); and
 6. Material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with 40CFR§§63.5170(a), (b), and (d);
 - c. Records specified in 40CFR§63.10(b)(3); and
 - d. Additional records specified in 40CFR§63.10(c) for each continuous monitoring system operated by the permittee in accordance with 40CFR§63.5150(a)(2).

[45CSR13, Permit No. R13-2379 -(Condition B.1.), 45CSR34, 40CFR§63.5190(a)]

- 5.4.4. For the purposes of determining compliance with the limits set forth in Condition 5.1.11 the permittee shall maintain records of the following:
- a. The name of each surface coating, as applied; and
 - b. The mass of VOC, HAP, and solids per volume of each surface coating and the volume of each surface coating, as applied, used each month.

Additionally, within fifteen (15) days of the last day of each month, the permittee shall create a summary report that contains the following information: hourly, monthly, and rolling yearly emission rates for VOCs and aggregate and speciated HAPs from Emission Point 11E. Said records shall be maintained on-site for a period of five (5) years and shall be certified and made available to the Director of the Division of Air Quality or his/her duly authorized representative upon request.

[45CSR13, Permit No. R13-2379 - (Condition B.10)]

- 5.4.5. For the purposes of determining compliance with the maximum fuel usage limits set forth in Condition 5.1.14, the permittee shall maintain accurate records of the hours of operation and the aggregate amount of natural gas consumed by the equipment therein. Said records shall be certified by a responsible official and

shall be maintained on-site for a period of five (5) years. Said records shall be made available to the Director of the Division of Air Quality or his/her duly authorized representative upon request.

[45CSR13, Permit No. R13-2379 - (Condition B.11)]

5.5. Reporting Requirements

5.5.1. Compliance with 40CFR60, Subpart TT reporting requirements for Coil Coating Line #1 shall be demonstrated as follows:

- a. If 5.1.9.a is used to show compliance for the Condition 5.1.9 VOC emission limits, the facility shall identify, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under Condition 5.1.9. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.
- b. The facility shall also submit reports at the frequency specified in 40CFR§60.7(c) semiannually when the incinerator temperature drops as defined under Condition 5.4.2. If no such periods occur, the owner or operator shall state this in the semiannual report.

[45CSR13, Permit No. R13-2379 - (Condition B.1. and B.5.), 45CSR16, 40CFR§§60.465(c) and (d)]

5.5.2. The Permittee shall submit the following reports to USEPA Region III and to the delegated State agency:

- a. The permittee employs a regenerative thermal oxidizer and shall submit start-up, shutdown, and malfunction reports as specified in 40CFR§63.10(d)(5). If your actions during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in 40CFR§63.6(e)(3), you must state such information in the report. The start-up, shutdown, or malfunction report will consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy. Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in 5.5.2.b.
- b. The permittee must submit semi-annual compliance reports containing the following information:
 1. Compliance report dates.
 - i. The first compliance report period ends on December 31.
 - ii. The first compliance report must be postmarked or delivered no later than January 31.
 - iii. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
 - iv. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31.
 - v. For each affected source that is subject to permitting regulations pursuant to 40CFR part 70 or part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to 40CFR§70.6(a)(3)(iii)(A) or 40CFR§71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (g)(1)(i) through (iv) of this Condition.

2. The semi-annual compliance report must contain the following information:
 - i. Company name and address.
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the accuracy 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 Table 1 to 40CFR§63.5170 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning dates you used each option.
 - v. A statement that there were no deviations from the standards during the reporting period.
- c. The permittee shall submit, for each deviation occurring at CCL#1 the semi-annual compliance report containing the information in paragraphs (b)(2)(i) through (iv) of this Condition and the following information:
 1. The total operating time of each affected source during the reporting period.
 2. Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable, and the corrective action taken monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes.
 3. Information on the number, duration, and cause for monitor downtime incidents (including unknown cause other than downtime associated with zero and span and other daily calibrations checks, if applicable).

[45CSR13, Permit No. R13-2379 -(Condition B.1.), 45CSR34, 40CFR§63.5180(a)]

5.6. Compliance Plan

5.6.1. N/A

6.0 Coating Line #2 [emission unit ID(s): 008/1, 008/2, 008/3, 008/4, 008/5; Control Device ID: CO3]

6.1 Limitations and Standards

- 6.1.1. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any incinerator which is twenty (20) percent opacity or greater, except as noted in 6.1.2.
[45CSR13, Permit No. R13-2379 -(Condition B.1.), 45CSR§6-4.3. (CO3)]
- 6.1.2. The provisions of Condition 6.1.1 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 start-up.
[45CSR13, Permit No. R13-2379 -(Condition B.1.), 45CSR§6-4.4. (CO3)]
- 6.1.3. 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 45CSR§§7-3.2, 3.3, 3.4, 3.5, 3.6, and 3.7.
[45CSR§7-3.1, 45CSR13, Permit No. R13-2379 - (Condition B.1. and B.3.) (008/1, 008/2, CO3)]
- 6.1.4. The provisions of Condition 6.1.3. shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period.
[45CSR§7-3.2, 45CSR13, Permit No. R13-2379 - (Condition B.1. and B.3.) (008/1, 008/2, CO3)]
- 6.1.5. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of the rule. The process weight rate for Coating Line #2 is 50,500 lbs/hr. The corresponding allowable particulate matter emission rate for Coil Coating Line #2, a type "b" source from Table 45-7A, is interpolated to be 31.31 lbs./hr.
[45CSR§7-4.1, 45CSR13, Permit No. R13-2379 - (Condition B.1. and B.3.) (Coating Line #2)]
- 6.1.6. No person shall cause, suffer, allow or permit the emission into the open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 parts per million by volume from existing source operations, except as provided in 45CSR§§10-4.1.a through 4.1.e.
[45CSR§10-4.1. (008/2, 17E)]
- 6.1.7. A thermal oxidizer, identified in permit application R13-2379 as CO3, shall be installed, maintained, and operated so as to achieve a minimum 98.00% destruction efficiency in the control of Volatile Organic Compound (VOC) emissions from the operations noted below and operate and monitor said CO3 according to the following conditions:
- a. In accordance with the information filed in permit application R13-2379, its amendments, and any subsequent revisions thereto, the Coater Room identified as 008/3, the Curing oven identified as 008/4, and the Quench Tank identified as 008/5 shall be installed, maintained, and operated so as to utilize CO3 as a control of VOCs.
 - b. The thermal oxidizer shall be in operation at all times when the equipment listed in 6.1.7.a are in operation and shall not be by-passed, disconnected, or otherwise rendered ineffective in the control of VOCs. The permittee shall record any and all times when a violation of 6.1.7.b occurs. The certified record shall contain, at a minimum, the amount of time the coating line was in operation without utilizing the thermal oxidizer and the cause for the shutdown.

- c. The thermal oxidizer shall burn only natural gas as its supplementary fuel source. Alternative fuels may be used only after receiving prior written approval from the Director.
- d. The thermal oxidizer shall maintain a combustion chamber temperature of no less than 1400 degrees Fahrenheit (760 degrees Celsius). The owner or operator shall install, calibrate, maintain, and continuously operate a monitoring device for the measurement of the thermal oxidizer combustion chamber temperature. The monitoring device is to be certified by the manufacturer to be accurate within $\pm 1\%$ in degrees Fahrenheit.
- e. With respect to section 6.1.7.d, the minimum value specified is considered valid until such time as other values are established during an approved compliance demonstration that guarantees the required minimum destruction efficiency. Any change in required minimum, maximum, or range of values shall not become effective until approved by the Director of the Division of Air Quality.

[45CSR13, Permit No. R13-2379 - (Condition A.1.) (CO3)]

6.1.8. Emissions from thermal oxidizer, identified as CO3, shall not exceed the following limits:

Pollutant	lbs/hr	tons/year
Carbon Monoxide (CO)	1.93	7.65
Oxides of Nitrogen (NO _x)	3.05	12.10
Sulfur Dioxide (SO ₂)	0.01	0.05
Particulate Matter(PM ₁₀)	0.17	0.69
Volatile Organic Compounds (VOCs)	2.90	11.53
Hazardous Air Pollutants (HAPs)	1.10	4.13

Compliance with the annual emission limits shall be determined using a 12 month rolling total.

Compliance with the more stringent particulate matter hourly limit ensures compliance with 45CSR§6-4.1.
[45CSR§6-4.1, 45CSR13, Permit No. R13-2379 - (Condition A.2, B.1., and B.2.) (CO3)]

6.1.9. Emissions from the chemical dryer identified as 008/2 shall not exceed the following limits:

Pollutant	lbs/hr	tons/year
Carbon Monoxide (CO)	0.50	1.70
Oxides of Nitrogen (NO _x)	0.60	2.38
Sulfur Dioxide (SO ₂)	0.01	0.03
Particulate Matter(PM ₁₀)	0.05	0.18
Volatile Organic Compounds (VOCs)	0.03	0.13

Compliance with the annual emission limits shall be determined using 12 month rolling totals.
[45CSR13, Permit No. R13-2379 - (Condition A.3.) (008/2)]

- 6.1.10. The maximum amount of natural gas fuel combusted in the following sources shall not exceed 23,000 cubic foot per hour nor 197,064,000 cubic feet per year:

Identification	Description
008/2	Chemical Dryer
008/4	Curing Oven
CO3	Thermal Oxidizer

Compliance with the combustion limit shall be determined using a 12 month rolling total.
[45CSR13, Permit No. R13-2379 - (Condition A.4.) (008/2, 008/4, CO3)]

- 6.1.11. Use of any surface coating containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP and not listed below shall be in accordance with the following:
- The permittee shall notify the Director in writing of the surface coating to be used and the HAP(s) contained therein within thirty (30) days of the use of the surface coating. Additionally, an MSDS sheet for the surface coating shall be supplied at this time to the Director.
 - The use of the surface coating shall be incorporated into the record keeping requirements contained herein.

HAP	CAS Number	HAP	CAS Number
Cumene	98828	Xylene	1330207
Ethyl Benzene	100414	Isophorone	78591
Methyl Isobutyl Ketone	108101	Naphthalene	91203
Formaldehyde	50000		

[45CSR13, Permit No. R13-2379 -(Condition A.10.)]

- 6.1.12. The coater rooms shall be constructed in order to achieve 100 percent capture efficiency.
[45CSR13, Permit No. R13-2379 - (Condition A.11.)]
- 6.1.13. The permittee shall maintain records of the amount and type of coatings applied to the steel and VOC and HAP emissions for the coating lines.
[45CSR13, Permit No. R13-2379 - (Condition A.12.)]
- 6.1.14. 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.

[45CSR13, Permit No. R13-2379 - (Condition B.1. and B.3.), 45CSR§7-5.1]

- 6.1.15. The Permittee must limit organic HAP emissions to the level specified:
- No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 percent reduction); or
 - No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or
 - If you use an oxidizer to control organic HAP emissions, operate the oxidizer such that an outlet organic HAP concentration of no greater than 20 parts per million by volume (ppmv) on a dry basis is achieved and the efficiency of the capture system is 100 percent.

[45CSR13, Permit No. R13-2379 -(Condition B.1 and B.7.), 45CSR34, 40CFR§63.5120(a). (CO3)]

- 6.1.16. The average combustion temperature of the regenerative thermal oxidizer shall be reduced to 3-hour block averages, and in any 3-hour period must not fall below 1661 degrees Fahrenheit.

[45CSR13, Permit No. R13-2379 -(Condition B.1., B.5., and B.7.), 45CSR16, 45CSR34, 40CFR§60.465(b)(2), 40CFR§63.5160(d)(3)(i), and 40CFR§63.5121(a). (CO3)]

- 6.1.17. The Permittee shall not cause to be discharged into the atmosphere more than:

- 0.14 kg VOC/l of coating solids applied for each calendar month for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or
- 10 percent of the VOC's applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency.

[45CSR13, Permit No. R13-2379 - (Condition B.1. and B.5.), 45CSR16, 40CFR§60.460(a), 40CFR§60.462. (CO3)]

6.2. Monitoring Requirements

- 6.2.1. At least monthly, 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 facility operation for a sufficient time interval to determine if the unit has visible emissions using procedures outlined in 40 CFR 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 40CFR60, Appendix A, Method 9 evaluation within seventy-two (72) hours. A Method 9 evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions. A record of each visible emission check required above shall be maintained on site for a period of no less than five (5) years. 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, and the name of the observer. If visible emissions are not identified from Method 22 during six (6) consecutive months, the emissions checks need only be once per quarter. If visible emissions are identified from Method 22 at any emission check, the Permittee must start over with another six (6) consecutive months of no visible emissions detected before going to quarterly monitoring.

[45CSR§30-5.1.c (CO3)]

- 6.2.2. At least monthly, visual emission checks of each emission point subject to an opacity limit shall be conducted. For units emitting directly into the open air from points other than a stack outlet, visible emissions are to include visible fugitive dust emissions that leave the plant site boundaries. These checks shall be conducted during periods of facility operation for a sufficient time interval to determine if the unit has visible emissions using procedures outlined in 40 CFR 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct an evaluation as outlined in 45CSR§7A-2.1.a,b within seventy-two (72) hours. A 45CSR§7A-2.1.a,b evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions. A record of each visible emission check required above shall be maintained on site for a period of no less than five (5) years. 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, and the name of the observer. If visible emissions are not identified from Method 22 during six (6) consecutive months, the emissions checks need only be once per quarter. If visible emissions are identified from Method 22 at any emission check, the Permittee must start over with another six (6) consecutive months of no visible emissions detected before going to quarterly monitoring.

[45CSR§7A-2.1.a,b (008/1, 008/2, CO3)]

- 6.2.3. The permittee employs a regenerative thermal oxidizer to comply with the requirements of the standards in Condition 6.1.15 and demonstrates continuous compliance through monitoring of a thermal oxidizer combustion chamber temperature as provided in paragraphs (a) and (b). The Permittee shall:
- a. Install, calibrate, maintain, and operate temperature monitoring equipment according to manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months; or the chart recorder, data logger, or temperature indicator must be replaced. The permittee must replace the equipment either if you choose not to perform the calibration, or if the equipment cannot be calibrated properly. Each temperature monitoring device must be equipped with a continuous recorder. The device must have an accuracy of ± 1 percent of the temperature being monitored in degrees Celsius, or ± 1 Celsius, whichever is greater.
 - b. For an oxidizer other than a catalytic oxidizer, to demonstrate continuous compliance with the operating limit established according to Condition 6.1.16, the Permittee shall install the thermocouple or temperature sensor in the combustion chamber at a location in the combustion zone.
 - c. The temperature data shall be reduced to 3-hour block averages.
 - d. Maintain the 3-hour average combustion temperature at or above 1661 degrees Fahrenheit.

[45CSR13, Permit No. R13-2379 -(Condition B.1. and B.7.), 45CSR34, 40CFR§63.5150(a)(3) and 40CFR§63.5121(a) (CO3)]

- 6.2.4. The permittee complies with the requirements of the standards in Condition 6.1.15 through the use of a capture system and control device, and has developed a capture system monitoring plan containing the information specified in paragraphs (a) and (b). The permittee monitors the capture system in accordance with paragraph (c) of this section. The monitoring plan is available for inspection by the permitting authority upon request.
- a. The monitoring plan must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained, explain why this parameter is appropriate for demonstrating ongoing compliance, and identify the specific monitoring procedures.

- b. The plan also must specify operating limits at the capture system operating parameter value, or range of values, that demonstrates compliance with the standards in Condition 6.1.15. The operating limits must represent the conditions indicative of proper operation and maintenance of the capture system.
- c. The permittee must conduct monitoring in accordance with the plan.

[45CSR13, Permit No. R13-2379 -(Condition B.1. and B.7.), 45CSR34, 40CFR§63.5150(a)(4)]

- 6.2.5. Compliance with Conditions 6.1.12 shall be shown by a pressure drop across the coating room of at least 0.007 inches H₂O. The Permittee shall take pressure drop measurements at least 1/shift.

[45CSR§30-5.1.c]

- 6.2.6. The Permittee shall include all coating materials (as defined in 40CFR§63.5110) used in the affected source when determining compliance with Condition 6.1.15. To make this determination, the Permittee shall use at least one of the four compliance options listed below:

a. *Use of “as purchased” compliant coatings:*

- 1. Each coating material used during the 12-month compliance period does not exceed 0.046 kg HAP per liter solids, as purchased. Compliance shall be shown by 40CFR§63.5170(a).

b. *Use of “as applied” compliant coatings:*

- 1. Each coating material used does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. Compliance shall be shown by 40CFR§63.5170(b)(1).
- 2. Average of all coating materials used does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. Compliance shall be shown by 40CFR§63.5170(b)(2).

c. *Use of a capture system and control device:*

- 1. Overall organic HAP control efficiency is at least 98 percent on a monthly basis for individual or groups of coil coating lines; or overall organic HAP control efficiency is at least 98 percent during initial performance test and operating limits are achieved continuously for individual coil coating lines; or oxidizer outlet HAP concentration is no greater than 20 ppmv and there is 100 percent capture efficiency during initial performance test and operating limits are achieved continuously for individual coil coating lines. Compliance shall be shown by 40CFR§63.5170(c).

d. *Use of a combination of compliant coatings and control devices and maintaining an acceptable equivalent emission rate:*

- 1. Average equivalent emission rate does not exceed 0.046 kg HAP per liter solids on a rolling 12-month average as applied basis, determined monthly. Compliance shall be shown by 40CFR§63.5170(c).

The Permittee may apply any of the compliance options to an individual coil coating line, or to multiple lines as a group, or to the entire affected source. The Permittee may use different compliance options for different coil coating lines, or at different times on the same line. However, the Permittee may not use

different compliance options at the same time on the same coil coating line. If the Permittee switches between compliance options for any coil coating line or group of lines, they shall document the switch as required by 6.4.3, and the Permittee must report it in the next semiannual compliance report required in 6.5.2.

[45CSR13, Permit No. R13-2379 -(Condition B.1. and B.7.), 45CSR34, 40CFR§63.5170]

6.3. Testing Requirements

- 6.3.1. Compliance with 40CFR60, Subparts A and TT testing requirements for Coil Coating Line #2 shall be demonstrated as follows:
- a. The owner or operator of an affected facility shall conduct an initial performance test as required under 40CFR§60.8(a) and thereafter a performance test for each calendar month for each affected facility according to the procedures in 40CFR§60.463.
 - b. Tests that are required by the Director to determine compliance with the destruction efficiency as set forth in Condition 6.1.7 of this permit shall be conducted in accordance with the methods as set forth below. The Director may require a different test method or approve an alternative method in light of any new technology advancements that may occur. Compliance testing shall be conducted at the maximum permitted operating conditions unless otherwise specified by the Director. Should the maximum permitted operating conditions allowed in this permit not be attainable during the initial compliance testing, then the facility shall be limited in operation to the maximum operating conditions attained during testing. The permittee shall again be required to perform such compliance testing when maximum permitted operating conditions are attainable. The maximum operating conditions attained during compliance testing shall be the maximum operating conditions allowed by this permit.
 1. Tests to determine compliance with VOC emission limits shall be conducted in accordance with Method 25, or 25A as set forth in 40 CFR 60, Appendix A.
 - c. With regard to testing required by the Director, the permittee shall submit to the Director of Air Quality a test protocol detailing the proposed test methods, the date, and the time the proposed testing is to take place, as well as identifying the sampling locations and other relevant information. The test protocol shall include the procedure for the determination of the maximum unit capacity (maximum airflow through Regenerative thermal oxidizer CO3) and the operational constraint(s) placed on the system that shall not allow operation of CO3 above this maximum capacity. The test protocol must be received by the Director no less than thirty (30) days prior to the date the testing is to take place. Test results shall be submitted to the Director within thirty (30) days after the stack testing completion date.

[45CSR13, Permit No. R13-2379 -(Condition B.1., B.5., and B.8.), 45CSR16, 40CFR§60.463]

- 6.3.2. The permittee has determined capture efficiency to meet the requirements of 40CFR§§63.5170(i)(2) through (3) and employed the procedures in paragraphs (a) or (b).
- a. For an enclosure that meets the criteria for a PTE, you may assume it achieves 100 percent capture efficiency. You must confirm that your capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40 CFR part 51, appendix M (or an EPA approved alternative method), and that all exhaust gases from the enclosure are delivered to a control device.
 - b. You may determine capture efficiency, CE, according to the protocols for testing with temporary total enclosures that are specified in Method 204A through F of 40 CFR part 51, appendix M.

[45CSR13, Permit No. R13-2379 -(Condition B.1.), 45CSR34, 40CFR§63.5160]

6.4. Recordkeeping Requirements

- 6.4.1. Compliance with the particulate matter and sulfur dioxide emission limitation established in Coil Coating Line #2 shall be demonstrated as follows:
- a. Demonstrate that natural gas was used as the only fuel
 - b. Continual compliance shall be demonstrated by maintaining records of fuel usage..
 - c. The average combustion chamber temperature during all of the regenerative thermal oxidizer cycles is a minimum of 1661 degrees Fahrenheit via a 3-hour block average.
 1. The permittee shall provide continuous monitoring of the combustion chamber temperature of the thermal oxidizers.

[45CSR§30-5.1.c (CO3)]

- 6.4.2. Compliance with 40 CFR 60, Subpart TT monitoring and recordkeeping requirements for Coil Coating Line #2 shall be demonstrated as follows:
- a. The facility shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with Condition 6.1.17. This device shall have an accuracy of $\pm 2.5^{\circ}\text{C}$ or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. Each owner or operator shall also record all periods (during actual coating operations) in excess of three hours during which the average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28°C (50°F) below the temperature at which compliance with Condition 6.1.17 was demonstrated during the most recent measurement of incinerator efficiency required by 40CFR§60.8. The records required by 40CFR§60.7 shall identify each such occurrence and its duration.
 - b. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate, any affected facility including associated air pollution equipment in a manner consistent with good air pollution control practice for minimizing emissions.
 - c. Each owner or operator subject to the provisions of 40 CFR 60, Subpart TT shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion temperature.

[45CSR13, Permit No. R13-2379 - (Condition B.1. and B.5.), 45CSR16, 40CFR§60.464(c), 40CFR§60.465(e), 40CFR§60.11(d)]

- 6.4.3. 40CFR§63.5190(a)- The permittee shall maintain records specified in this Condition in accordance with 40CFR§63.10(b)(1):
- a. Records of the coating lines on which you used each compliance option and the time periods (beginning and ending dates and times) you used each option.
 - b. Records specified in 40CFR§63.10(b)(2) of all measurements needed to demonstrate compliance with 40 C.F.R. 63, Subpart SSSS, including:

1. Continuous emission monitor data in accordance with 40CFR§63.5150(a)(2);
 2. Control device and capture system operating parameter data in accordance with 40CFR§§63.5150(a)(1), (3), and (4);
 3. Organic HAP content data for the purpose of demonstrating compliance in accordance with 40CFR§63.5160(b);
 4. Volatile matter and solids content data for the purpose of demonstrating compliance in accordance with 40CFR§63.5160(c);
 5. Overall control efficiency determination or alternative outlet HAP concentration using capture efficiency tests and control device destruction or removal efficiency tests in accordance with 40CFR§§63.5160(d), (e), and (f); and
 6. Material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with 40CFR§§63.5170(a), (b), and (d);
- c. Records specified in 40CFR§63.10(b)(3); and
- d. Additional records specified in 40CFR§63.10(c) for each continuous monitoring system operated by the owner or operator in accordance with 40CFR§63.5150(a)(2).

[45CSR13, Permit No. R13-2379 -(Condition B.1.), 45CSR34, 40CFR§63.5190(a)]

- 6.4.4. For the purposes of determining compliance with the limits set forth in Conditions 6.1.8 and 6.1.9, the permittee shall maintain records of the following:
1. The name of each surface coating, as applied; and
 2. The mass of VOC, HAP, and solids per volume of each surface coating and the volume of each surface coating, as applied, used each month.

Additionally, within fifteen (15) days of the last day of each month, the permittee shall create a summary report that contains the following information: hourly, monthly, and rolling yearly emission rates for VOCs and aggregate and speciated HAPs from Emission Points P16 and P17. Said records shall be maintained on-site for a period of five (5) years and shall be certified and made available to the Director of the Division of Air Quality or his/her duly authorized representative upon request.

[45CSR13, Permit No. R13-2379 - (Condition B.10.)]

- 6.4.5. For the purposes of determining compliance with the maximum fuel usage limits set forth in Condition 6.1.10, the permittee shall maintain accurate records of the hours of operation and the aggregate amount of natural gas consumed by the equipment therein. Said records shall be certified by a responsible official and shall be maintained on-site for a period of five (5) years. Said records shall be made available to the Director of the Division of Air Quality or his/her duly authorized representative upon request.
- [45CSR13, Permit No. R13-2379 - (Condition B.11.)]**

6.5. Reporting Requirements

- 6.5.1. Compliance with 40CFR60, Subpart TT reporting requirements for Coil Coating Line #2 shall be demonstrated as follows:

- a. If 6.1.17.a is used to show compliance for the Condition 6.1.17 VOC emission limits, the facility shall identify, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under 40CFR§60.462. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.
- b. The facility shall also submit reports at the frequency specified in 40CFR§60.7(c) semiannually when the incinerator temperature drops as defined under Condition 6.4.2. If no such periods occur, the owner or operator shall state this in the semiannual report.

[45CSR13, Permit No. R13-2379 -(Condition B.1. and B.5.), 45CSR16, 40CFR§§60.465(c) and (d)]

- 6.5.2. The Permittee shall submit the reports specified in paragraphs (a) through (c) of this section to USEPA Region III and to the delegated State agency:
 - a. The permittee employs a regenerative thermal oxidizer and shall submit start-up, shutdown, and malfunction reports as specified in 40CFR§63.10(d)(5). If your actions during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the source's start-up, shutdown, and malfunction plan specified in 40CFR§63.6(e)(3), you must state such information in the report. The start-up, shutdown, or malfunction report will consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy. Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in 6.5.2.b.
 - b. The permittee must submit semi-annual compliance reports containing the information specified in paragraphs (b)(1) and (2) of this section.
 1. Compliance report dates.
 - i. The first compliance report period ends on December 31.
 - ii. The first compliance report must be postmarked or delivered no later than January 31,
 - iii. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
 - iv. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31.
 - v. For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or part 71, and the permitting authority has established dates for submitting semiannual reports pursuant to 40CFR§70.6(a)(3)(iii)(A) or 40CFR§71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1)(i) through (iv) of this section.
 2. The semi-annual compliance report must contain the following information:
 - i. Company name and address.
 - ii. Statement by a responsible official with that official's name, title, and signature, certifying the accuracy 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 Table 1 to 40CFR§63.5170 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning dates you used each option.
 - v. A statement that there were no deviations from the standards during the reporting period.
- c. The permittee shall submit, for each deviation occurring at CCL#2 the semi-annual compliance report containing the information in paragraphs (b)(2)(i) through (iv) of this Condition and the information in paragraphs (c)(1) through (3) of this paragraph:
1. The total operating time of each affected source during the reporting period.,
 2. Information on the number, duration, and cause of deviations (including unknown cause, if applicable) as applicable, and the corrective action taken monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes.
 3. Information on the number, duration, and cause for monitor downtime incidents (including unknown cause other than downtime associated with zero and span and other daily calibrations checks, if applicable).

[45CSR13, Permit No. R13-2379 -(Condition B.1.), 45CSR34, 40CFR§63.5180(a)]

6.6. Compliance Plan

6.6.1. N/A

7.0 Source-Specific Requirements [Miscellaneous Plant Operations]

7.1. Limitations and Standards

- 7.1.1. The permittee 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.

[45CSR13, Permit No. R13-2379 - (Condition B.1. and B.3.) and 45CSR§7-5.2. (006-01)]

7.2. Monitoring Requirements

- 7.2.1 N/A

7.3. Testing Requirements

- 7.3.1 N/A

7.4. Recordkeeping Requirements

- 7.4.1. The facility shall keep records of date and quantities of material applied for each dust suppressant application.

[45CSR§30-5.1.c]

7.5. Reporting Requirements

- 7.5.1 N/A

7.6. Compliance Plan

- 7.6.1 N/A