

# Fact Sheet



## For Final Renewal Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-00900004-2018**  
Application Received: **March 20, 2017**  
Plant Identification Number: **009-00004**  
Permittee: **Jupiter Aluminum Corporation**  
Facility Name: **Jupiter Coil Coating**  
Mailing Address: **8963 River Road, Wellsburg, WV 26070**

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Physical Location: Beech Bottom, Brooke County, West Virginia  
UTM Coordinates: 528.81 km Easting • 4452.42 km Northing • Zone 17  
Directions: Facility is located on the west side of WV State Rt. 2, just south of  
Beech Bottem.

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### Facility Description

The Jupiter Coil Coating Plant manufactures coated metal coils under Standard Industrial Classification (SIC) code 3479.

### Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2015 Actual Emissions
Carbon Monoxide (CO)	22.24	0.81
Nitrogen Oxides (NO <sub>x</sub> )	28.17	1.08
Particulate Matter (PM <sub>2.5</sub> )	7.42	0.62
Particulate Matter (PM <sub>10</sub> )	7.42	0.62
Total Particulate Matter (TSP)	7.42	0.82

Regulated Pollutants	Potential Emissions	2015 Actual Emissions
Sulfur Dioxide (SO <sub>2</sub> )	0.15	<0.01
Volatile Organic Compounds (VOC)	48.56	0.87

*PM<sub>10</sub> is a component of TSP.*

Hazardous Air Pollutants	Potential Emissions	2015 Actual Emissions
Methyl Isobutyl Ketone	1.46	0
Isophorone	2.93	<0.01
Ethylbenzene	1.94	<0.01
Formaldehyde	0.37	<0.01
Cumene	0.37	<0.01
Naphthalene	2.07	0.02
Xylene	6.51	0.02
Total	15.65	0.05

*Some of the above HAPs may be counted as PM or VOCs.*

### Title V Program Applicability Basis

Jupiter Aluminum Corporation is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30 in accordance with 45CSR§30-3.1.a.3. The facility is subject to 40 CFR 63, Subpart SSSS and was a major source of HAPs before the effective date of this subpart.

### Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State: 45CSR2	Indirect Heat Exchangers
45CSR6	Open burning prohibited
45CSR7	Particulate Matter Emissions
45CSR10	Sulfur Oxides Emissions
45CSR11	Standby plans for emergency episodes.
45CSR13	NSR Permits
45CSR16	Performance Standards for New Stationary Sources
WV Code § 22-5-4(a)(14)	The Secretary can request any pertinent information such as annual emission inventory reporting
45CSR30	Operating permit requirement
45CSR34	Emission Standards for HAPs
40 CFR 60, Subpart TT	Metal Coil Surface Coating
40 CFR Part 61	Asbestos inspection and removal
40 CFR 63, Subpart SSSS	Surface Coating of Metal Coil MACT
40 CFR Part 82, Subpart F	Ozone depleting substances

State Only: 45CSR4 No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

**Active Permits/Consent Orders**

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-2379E	September 26, 2017	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

**Determinations and Justifications**

This renewal includes a minor modification, which incorporates Permit R13-2379E. R13-2379E authorizes the replacement of the four (4) 25.2 mmBtu/hr boilers with one 8.65 mmBtu/hr boiler and allows a lower VOC destruction efficiency for the Regenerative Thermal Oxidizer. The R13 permit used the new permit format and the R13 citations were updated to the new numbering.

The following changes have been made since the last permit was issued:

Section 1.0 - In the Emission Units Table, the four (4) 25.2 mmBtu/hr boilers were removed and replaced with one (1) 8.65 mmBtu/hr boiler. In the Active Permits table, the permit number and date of issuance were updated.

Boilerplate changes: Conditions 3.5.3., 3.5.5. and 3.5.6. were changed to require electronic submittal of reports.

40 CFR 63, subpart JJJJJJ was added to the Permit Shield section in 3.7. See non-applicability determination.

Former conditions 4.1.2., 4.1.3., 4.1.4., and 4.4.1. were deleted because they are no longer applicable requirements. 45CSR§2-11.1 exempts fuel burning units having a heat input under 10 mmBTU/hr from sections 4, 5, 6, 8 and 9. 45CSR§2A-3.1 states that it only applies to fuel burning unit(s) having a design heat input over 10 mmBTU/hr. 45CSR§10-10.1 exempts fuel burning units having a design heat input under ten (10) mmBTU/hr from section 3 and sections 6 through 8.

New conditions 4.1.2., 4.1.3., and 4.2.1., from R13-2379E, were added to the Title V permit. The monitoring required by the NSR permit was deemed sufficient for Title V purposes because the emissions from the natural gas fired boiler are minimal.

Permit R13-2379E, conditions 4.1.4., 4.4.2. and 4.4.3. were not incorporated into the Title V Permit because there is no air pollution control equipment associated with the boiler (003-05).

Old condition 5.1.12. (new condition 5.1.14.) was changed to correspond with the lower destruction efficiency required by R13-2379E. In accordance with R13-2379E, a performance test determined the 96% destruction efficiency, and the HAP emission requirements from 40 CFR 63, Subpart SSSS are easily met at 96% destruction efficiency.

Removed hexane from old condition 5.1.11. (new condition 5.1.13.) per Rule 13 permit, condition 5.1.8.

Added new conditions 5.1.12., 5.2.3., 5.3.1., 5.3.3., 5.4.1., 5.4.2., and 5.5.1.

Old condition 5.1.17. was moved to the Recordkeeping Section as condition 5.4.3.

Old condition 5.2.3 was deleted. This condition was redundant with new conditions 5.1.9. and 5.1.12.

Condition 5.2.5. was expanded to include monitoring requirements from 40 CFR §§63.5170(d) and (f).

Old condition 5.3.1. was revised and is now new conditions 5.3.2. and 5.3.3. per Rule 13 permit.

Old condition 5.3.2. was deleted and replaced with new condition 5.3.4. to correspond with the R13-2379E, condition 5.1.6.

Condition 5.4.1. of the previous permit required recordkeeping of fuel usage to demonstrate compliance with PM and SO<sub>2</sub> limits, however condition 5.4.5. of the renewal permit requires fuel usage recordkeeping as authorized by Permit R13-2379, condition 5.4.5. Therefore, old Condition 5.4.1. was removed.

Old condition 5.4.2.a. was deleted because it was redundant with new condition 5.2.3.

Condition 5.4.4. was updated to correspond with the R13-2379E, condition 5.4.4.

### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

- 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 CFR Part 63, Subpart DDDDD Boiler MACT - The facility is not a major source of HAPs, therefore this subpart does not apply.
- f. 40 CFR Part 63, Subpart JJJJJ - This regulation does not apply since the boiler is natural gas fired.
- g. 40 CFR Part 68 Risk Management Plan - This regulation is not applicable because none of the storage thresholds are triggered.

- h. 40 CFR Part 64 - Compliance Assurance Monitoring (CAM) - Emission units with a control device are subject to an NSPS and MACT. Therefore, the facility is exempt from Compliance Assurance Monitoring in accordance with 40 CFR §64.2(b)(1)(i).

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: Friday, December 15, 2017

Ending Date: Tuesday, January 16, 2018

### **Point of Contact**

All written comments should be addressed to the following individual and office:

Bobbie Scroggie  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57th Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478  
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### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

On January 15, 2018, the WV DEP Division of Air Quality received comments submitted by Mark Volkmann, Environmental, Health & Safety Director, relating to Jupiter Aluminum Corporation's Jupiter Coil Coating Division (JCC) Draft/Proposed Permit R30-00900004-2018. The following is the DAQ's Response to the comments.

**Comment 1 - Condition 5.1.3 - JCC requests that this condition (and related requirements) be removed from the permit because JCC does not operate an "incinerator" at this plant.**

Jupiter does not agree with the applicability of West Virginia Rule *45-6-1 "Control of Air Pollution from Combustion of Refuse"* (Rule 6) to JCC's operation for the reasons set forth below. If Condition 5.1.3 is retained in the permit, JCC requests further explanation from WVDEP as to how a rule regulating particulate matter emissions from the combustion of refuse is applicable to a pollution control device for a metal coil coating line.

In support of this comment, JCC states the following:

- a. In the application for a Permit to Modify submitted to WVDEP in October 2004, the then-owner/operator Wheeling Corrugating Company indicated that Rule 6 was not applicable to the proposed modification. A subsequent determination was made by WVDEP that this Rule was applicable to the

proposed modification, but JCC cannot understand why since neither Wheeling Corrugating Company nor JCC incinerates (or have incinerated) refuse. The applicability section, Rule 45 CSR 6-1.1a, states:

This rule establishes emission standards for particulate matter and requirements for activities involving incineration of refuse which are not subject to, or are exempted from regulation under a federal counterpart for specific combustion sources. This rule also prohibits (with limited exception) open burning and sets forth the registration, permitting, reporting, testing, emergency, natural disaster and exemption provisions for activities involving the combustion of refuse and land clearing debris.

(Emphasis added.) JCC does not incinerate refuse, does not engage in open burning, and is not engaged in the combustion of refuse or land clearing debris. Therefore, Rule 6 is not applicable and JCC cannot understand the basis of WVDEP's original determination (or current interpretation).

**DAO Response:** *According to our records, the applicability determinations for Rules 6 and 7 were first made for permit R13-2379 issued in 2000 and for the initial Title V permit that was issued in 2002.*

*JCC is correct that 45CSR§6-1.1.a. establishes emission standards for particulate matter and requirements for activities involving incineration of refuse which are not subject to, or are exempted from regulation under a federal counterpart for specific combustion sources.*

*However, the interpretation as to the applicability of Rule 6 to JCC must consider 45CSR§6-2.7. which defines "Incineration". For the purposes of this rule, the destruction of any combustible liquid or gaseous material by burning in a flare or flare stack, thermal oxidizer or thermal catalytic oxidizer stack shall be considered incineration.*

*JCC confirms in comment e. that it uses a thermal oxidizer "to convert (destroy) gaseous materials", therefore it meets the definition of "incineration" and meets the applicability requirement in 45CSR§6-1.1.a. There is no exemption from Rule 6 because the thermal oxidizer is to reduce emissions. Gaseous materials are destroyed, therefore it is applicable.*

- b. The fact that JCC is not engaged in the incineration of refuse is reflected by the applicable SIC codes (which were included in JCC's application as required by WVDEP regulations). The Standard Industrial Classification (SIC) Code for Jupiter's operations is 3479, Coating, Engraving, and Allied Services, Not Elsewhere Classified.<sup>1</sup> This SIC Code for a business engaged in refuse handling is 4953 Refuse Systems.<sup>2</sup> The different SIC Codes confirm that JCC is not in the business of incinerating refuse.

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<sup>1</sup>3479 Coating, Engraving, and Allied Services, Not Elsewhere Classified Establishments primarily engaged in performing the following types of services on metals, for the trade: (1) enameling, lacquering, and varnishing metal products; (2) hot dip galvanizing of mill sheets, plates and bars, castings, and formed products fabricated of iron and steel; hot dip coating such items with aluminum, lead, or zinc; retinning cans and utensils; (3) engraving, chasing and etching jewelry, silverware, notarial and other seals, and other metal products for purposes other than printing; and (4) other metal services, not elsewhere classified. Also included in this industry are establishments which perform these types of activities on their own account on purchased metals or formed products. Establishments that both manufacture and finish products are classified according to the products.

<sup>2</sup>4953 Refuse Systems Establishments primarily engaged in the collection and disposal of refuse by processing or destruction or in the operation of incinerators, waste treatment plants, landfills, or other sites for disposal of such materials. Establishments primarily engaged in collecting and transporting refuse without such disposal are classified in Transportation, Industry 4212.

***DAQ Response:*** WV State Rules are not based on SIC Codes. Federal Regulations such as NSPS and NESHAP are source specific, where SIC Codes are relevant. WV State Rules are more pollutant specific. State Rules are written to apply to many different types of sources. Rule 6 was written with the intent to regulate PM emissions from open burning and incinerators and to include flare and thermal oxidizers in the definition of incinerators. WVDEP has consistently applied Rule 6 to every facility in the state that has a flare, flare stack, thermal oxidizer, or thermal catalytic oxidizer, unless a source is subject to a federal rule for specific combustion sources.

- c. In addition to the SIC Code differences, waste incinerators have different types of operations than those of JCC. Specifically, typical waste-incineration facilities include the following operations; waste storage and feed preparation, refuse combustion in a furnace producing white hot gases and a bottom ash residue, gas temperature reduction (frequently involving some type of heat recovery such as steam generation), treatment of the cooled gases to remove air pollutants, and disposal of residual materials from the process. They also include dispersion of the treated gas to the atmosphere through an induced draft fan and stack. These activities have no resemblance to JCC's operations.

***DAQ Response:*** Per 45CSR§6-1.1.a., Rule 6 applies to incineration of refuse as defined in 45CSR§6-2.7. and 2.18.. Rule 6 does not state that it applies only to waste incinerators as you have described. In fact, the process you have described is not specifically mentioned in Rule 6.

- d. In addition, JCC disagrees with the contention that the emissions generated by the coil coating operation are "refuse" because JCC "has no intention of collecting or reusing the VOCs/HAPs, therefore they fall under the definition of "refuse" in Section 45-6-2.18<sup>3</sup> - useless, unwanted gaseous waste." Common sense confirms that VOC emissions from a metal coil coating line are not refuse or simply put, are not garbage. 33 CSR 1.2.119 defines "solid waste."<sup>4</sup> That definition, while not directly applicable, clarifies how the WVDEP classifies refuse, which is as a solid waste, no different than common household trash that is intended to be collected and thrown away. Jupiter's thermal oxidizer provides for the continuous destruction of VOC emissions generated in curing ovens that a coated strip is processed through. Jupiter does not collect these emissions and these emissions are not "refuse" under any recognized interpretation.

***DAQ Response:*** DAQ disagrees with JCC's contention that we classify refuse as a solid waste. 45CSR§6-2.18 clearly defines "refuse" as solid, liquid, or gaseous. Refuse is any material that is not a product to be sold, recycled, or reused. The definition of solid waste is not in this rule because this rule is not restricted to solid waste.

- e. Also, JCC's thermal oxidizer is an "air pollution control device," not an "incinerator" used for the incineration of combustible refuse. WVDEP has informed Jupiter that there is no definition or rule that says a pollution control device cannot also be an incinerator, but at 45 CSR 6-2.4<sup>5</sup> there is a definition for "air pollution control equipment." The thermal oxidizer used at JCC is designed to convert (destroy) gaseous materials for the purpose of preventing or reducing emissions of these materials into the open air. It is not a device that destroys combustible refuse by burning in a furnace that is designed

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<sup>3</sup>Refuse means the useless, unwanted or discarded solid, liquid or gaseous waste materials resulting from community, commercial, industrial or citizen activities.

<sup>4</sup>Solid Waste means any garbage, paper, litter, refuse, cans, bottles, waste processed for the express purpose of incineration; sludge from a waste treatment plant, water supply treatment plant or air pollution control facility; and other discarded materials, including carcasses of any dead animal or any other offensive or unsightly matter; solid, liquid, semisolid, or contained liquid or gaseous material resulting from industrial, commercial, mining or agricultural operations and community activities.

<sup>5</sup>"Air Pollution Control Equipment" means any equipment used for collecting or converting gaseous particulate or gaseous materials for the purpose of preventing or reducing emission of these materials into the open air.

for that purpose. JCC's thermal oxidizer is "air pollution control equipment," as defined under 45-6-2.4, not an "incinerator."

***DAQ Response:*** *DAQ agrees that 45CSR§6-2.4 defines air pollution control equipment, however, the definition does not exempt incinerators, and the definition for incineration and incinerators in 45CSR§§6-2.7 and 2.8. do not exempt air pollution control equipment. We understand the purpose of the thermal oxidizer is to convert (destroy) gaseous materials for the purpose of preventing or reducing emissions of these materials into the open air, but we also point out that this purpose fits the definition of incineration in 45CSR§6-2.7, which includes the destruction of any combustible gas in a thermal oxidizer.*

- f. Another incongruity with Condition 5.1.3 being applied to JCC's operations (and another confirmation that this rule is being applied improperly) is that the condition calculates an allowable particulate matter emission limit as if the thermal oxidizer is an incinerator. The condition uses a capacity for input to the oxidizer based on the paint capacity as if it were capacity of the "incinerator." This approach does not make sense and reflects the non-applicability of this rule to this operation. The paint is not incinerated. It is not refuse. It is rolled on aluminum coils. There is minimal particulate generated from the application of paint to the aluminum coils and coating of coils bears no resemblance to refuse to be incinerated.

***DAQ Response:*** *45CSR§6-4.1 states that "No person shall cause or allow particulate matter to be discharged from any incinerator into the open air in excess of the quantity determined by use of the following formula: Emissions (lb/hr) = F x Incinerator Capacity (tons/hr), where, the factor, F, is as indicated in Table I of 45CSR6"; and incinerator capacity is defined by 45CSR§6-2.9 as "the manufacturer's or designer's guaranteed maximum charging rate or such other rate as may be determined by the Secretary in accordance with good engineering practices."*

*Please note that 45CSR§6-4.1 applies to any incinerator. An incinerator is defined by 45CSR§6-2.8 as "any device used to accomplish incineration"; and 45CSR§6-2.7 defines incineration and specifically states that "For the purposes of this rule, the destruction of any combustible liquid or gaseous material by burning in a flare or a flare stack, thermal oxidizer or thermal catalytic oxidizer stack shall be considered incineration." Although the requirements of this rule may not seem to JCC to be applicable to the thermal oxidizer being used to destroy a byproduct of the process, which generates unwanted gaseous emissions from the coil coating line, the thermal oxidizer does meet the definition of incinerator and therefore 45CSR§6-4.1 does apply to this control device. It has not been the intention of the DAQ to apply this rule exclusively to the destruction of solid waste, as indicated by the definition of refuse in 45CSR§6-2.18 which specifies "useless, unwanted or discarded solid, liquid or gaseous waste materials." The DAQ agrees that neither the paint nor the aluminum coils are incinerated. The "refuse" being incinerated are the unwanted gaseous vapors emitted from the coil coating line and routed through the thermal oxidizer for destruction. In absence of the manufacturer's or designer's guaranteed maximum charging rate, the DAQ calculated a rate based upon material throughput.*

- g. The only potentially meaningful source of particulate matter from this operation is from the combustion of fuel by the thermal oxidizer. JCC's thermal oxidizer only combusts natural gas. EPA has recognized that particulate emissions from the combustion of natural gas are minimal. For example, under 40 CFR 60, Subpart Dc, EPA does not impose any opacity or particulate limits on industrial boilers that only combust natural gas. See 40 CFR 60.43c(c). This reality further supports a conclusion that imposing an incineration rule on the oxidizer of JCC's coil coating line is incorrect because the end result is to regulate particulate matter from the oxidizer when there is in fact only trace amounts of potential particulate matter emissions. Those particulate emissions from that operation are estimated at less than 0.5 TPY.

**DAQ Response:** *DAQ recognizes that the PM emissions from the thermal oxidizer will be minimal. DAQ is required to include all applicable requirements in the Title V permit, but has discretion under 45CSR§30-5.1.c. where monitoring, record keeping, and reporting requirements are needed to demonstrate compliance. Since the PM emissions will be minimal, we only required visible emissions monitoring because if the thermal oxidizer is not operating correctly, there will be excessive smoke. Since the thermal oxidizer is not a boiler subject to 40 CFR 60, Subpart Dc, it is not relevant to correlate the PM emission limits or lack thereof under this regulation with the PM emission limits under Rule 6.*

**Comment 2 - Condition 5.1.6 - JCC does not agree that Rule 7 "To Prevent and Control Particulate Air Pollution from Manufacturing Process Operations" applies to its operation and believes this condition should be deleted.**

The WVDEP applicability of Rule 7 is based on the 2004 WVDEP Engineering Evaluation/Fact Sheet which states:

45 CSR 7 limits the total stack emission rate of particulate matter to be discharged from any manufacturing process operation. The Rule established emission rate for this particular operation is 33 lb/hr (even when based only upon the steel strip weight of 100,000 lb/hr.) The total stack emission from the facility will be 1.6 lb/hr, which is well under the 45CSR 7 limit.

JCC has reviewed Rule 7 and at 45 CSR 7-2.39 "Source Operation Type" and based on the emission rate above of 33 lb/hr, this puts Jupiter into a Type "b" categorization. A Type "b" is defined as, "any metallurgical manufacturing process source operation. Gray iron cupolas located in the counties of ..... shall be classified as Type 'b' source operations." JCC operates a metal coil coating line, the metal strip is not processed in any manner that would change metallurgical properties. Therefore, Rule 7 does not apply to this operation because since it is not a metallurgical manufacturing process, it does not fall within any of the covered "Source Operation Types" as defined in 45 CSR 7-2.39b. Additionally, applying this rule on the oxidizer of JCC's coil coating line is incorrect because the end result is to regulate particulate matter from the oxidizer when there is in fact only trace amounts of potential particulate matter emissions. Those particulate emissions from that operation are estimated at less than 0.5 TPY. Therefore, this condition should be deleted.

**DAQ Response:** *The purpose of 45CSR7 is to prevent and control PM air pollution from manufacturing processes and associated operations. The definition for manufacturing process is listed in 45CSR§7-2.20.: "Manufacturing Process" means any action, operation or treatment, embracing chemical, industrial or manufacturing efforts, and employing, for example, heat treating furnaces, by-product coke plants, core-baking ovens, mixing kettles, cupolas, blast furnaces, open hearth furnaces, heating and reheating furnaces, puddling furnaces, sintering plants, electric steel furnaces, ferrous and non-ferrous foundries, kilns, stills, driers, crushers, grinders, roasters, and equipment used in connection therewith and all other methods or forms of manufacturing or processing that may emit smoke, particulate matter or gaseous matter. Again, since the state rules are written to include many different types of sources, the definition of manufacturing process reflects this when it states "all other methods or forms of manufacturing or processing that may emit smoke, particulate matter or gaseous matter."*

*JCC's coating applications and curing ovens are understood to be "manufacturing efforts". If it was not necessary to heat and coat the aluminum coils for sale, then JCC wouldn't do it. Because manufacturing is taking place and because JCC confirms that there are potential PM emissions, even though it may be trace amounts, Rule 7 is an applicable requirement.*

*There is no minimum amount of PM that exempts a source from this rule. Again, DAQ is required to include all applicable requirements in the Title V permit, but has discretion where monitoring, record keeping, and*

*reporting requirements are needed to demonstrate compliance. Since the PM emissions will be minimal, we only required visible emissions monitoring.*

DAQ would like to note that JCC indicated in its Title V Permit application (submitted on March 20, 2017) that 45CSR6 and 45CSR7 are applicable requirements. In addition, Title V is required to incorporate NSR Permit requirements and both 45CSR6 and 45CSR7 are listed as applicable requirements in the NSR permit.

In conclusion, West Virginia Rule 45CSR§30-5.1. states that each Title V operating permit shall include all applicable requirements that apply to the source at the time of permit issuance. It is the determination of the WV DEP Division of Air Quality that all current applicable requirements for Jupiter Aluminum Corporation's Jupiter Coil Coating were included in the Draft/Proposed Title V Renewal Permit issued on December 15, 2017. Therefore, there will be no changes made to the Final Title V Renewal Permit