

West Virginia Department of Environmental Protection

Harold D. Ward
Cabinet Secretary

Title V Operating Permit Revision



For Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Action Number: MM01 **SIC:** 3479
Name of Permittee: Jupiter Aluminum Corporation
Facility Name/Location: Jupiter Coil Coating
County: Brooke County
Permittee Mailing Address: 8963 River Road, Wellsburg, WV 26070

Description of Permit Revision: This modification is to remove CCL#2-Quench Tank (Emission Unit ID 008-5) and CCL#2-Roll Forming (Emission Unit ID 006-03) as emission units and remove the requirement to vent the Quench Tank to the RTO.

Title V Permit Information:

Permit Number: R30-00900004-2023
Issued Date: April 11, 2023
Effective Date: April 25, 2023
Expiration Date: April 11, 2028

Directions To Facility: Facility is located on the west side of WV State Rt. 2, just south of Beech Bottom.

THIS PERMIT REVISION IS ISSUED IN ACCORDANCE WITH THE WEST VIRGINIA AIR POLLUTION CONTROL ACT (W.VA. CODE §§ 22-5-1 ET SEQ.) AND 45CSR30 - "REQUIREMENTS FOR OPERATING PERMITS." THE PERMITTEE IDENTIFIED AT THE FACILITY ABOVE IS AUTHORIZED TO OPERATE THE STATIONARY SOURCES OF AIR POLLUTANTS IDENTIFIED HEREIN IN ACCORDANCE WITH ALL TERMS AND CONDITIONS OF THIS PERMIT.

Laura M. Crowder

Laura M. Crowder
Director, Division of Air Quality

Laura M. Crowder
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Date: 2024.08.13 09:21:27 -0400

August 13, 2024

Date Issued

Permit Number: **R30-00900004-2023**
Permittee: **Jupiter Aluminum Corporation**
Facility Name: **Jupiter Coil Coating**
Permittee Mailing Address: **8963 River Road, Wellsburg, WV 26070**

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:	Wellsburg, Brooke County, West Virginia
Facility Mailing Address:	8963 River Road, Wellsburg, WV 26070
Telephone Number:	(304) 394-1559
Type of Business Entity:	Corporation
Facility Description:	The Jupiter Coil Coating facility operates two coil coating lines, a natural gas-fired boiler, and two regenerative thermal oxidizers. The facility receives long thin strips of metal rolled into coils. The process for Coil Coating Line #1 includes cleaning the metal strip, applying a primer coat, drying, and quenching then applying a finish coat, drying, quenching, and recoiling. The process for Coil Coating Line #2 includes cleaning the metal strip, applying a coat, drying, quenching, and recoiling. Both processes release volatile organic compounds. Emissions are treated by each line's respective regenerative thermal oxidizer before being discharged into the atmosphere.
SIC Codes:	3479
UTM Coordinates:	528.81 km Easting • 4,452.42 km Northing • Zone 17

Permit Writer: Sarah Barron

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
Coil Coating Line #1 (CCL#1) and Boiler					
003-05	Boiler #5	Natural Gas Fired Boiler	2013	8.65 mmBtu/hr	None
CCL#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 metal strip after exiting the cleaning tanks and chrome roll coater and prior to application of the primer coat.	1960	4 mmBtu/hr	None
1S	12E	CCL#1 Primer coating application room	2005	60 gal/hr	4C
2S	12E	CCL#1 Finish coating application room	2005		4C
7S	12E	CCL#1 Primer Curing Ovens	2005	(3) 5 mmBtu/hr	4C
8S	12E	CCL#1 Finish Curing Ovens	2005	(3) 5 mmBtu/hr	4C
CCL#1 Control Device					
4C	12E	CCL#1 Regenerative Thermal Oxidizer	2020	15 mmBtu/hr	N/A
Coil Coating Line #2 (CCL#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	None
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

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
008-5	Stack P17	CCL#2—Quench Tank. Water sprays applied to cool steel strip exiting the curing oven.	2002	N/A	CO3
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
CCL#2 Control Device					
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
R13-2379 <u>HI</u>	August 11, 2021 <u>May 2, 2024</u>

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 other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.39.). 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§30-2.40]

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. Reserved

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.]

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. **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 owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased, or controlled access roads by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.

[45CSR§7-5.2., 45CSR13, Permit R13-2379, 5.1.3.]

- 3.1.10. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2379 through R13-2379H, and any modification, administrative updates, or 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.

[45CSR§§13-5.10. and 10.3., 45CSR13, Permit R13-2379, 2.5.1.]

3.2. Monitoring Requirements

- 3.2.1. None.

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., 45CSR13, Permit R13-2379, 4.4.1. and 5.4.1.]

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

[45CSR§30-5.1.c.2.B.]

- 3.4.3. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§30-5.1.c. State-Enforceable only.]

3.5. 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 compliance certification and semi-annual monitoring reports to the DAQ and USEPA as required in 3.5.5 and 3.5.6 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, or mailed first class or by private carrier with postage prepaid to the address(es), or submitted in electronic format by e-mail as set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

US EPA:

Section Chief
U. S. Environmental Protection Agency, Region III
Enforcement and Compliance Assurance Division
Air, RCRA, and Toxics Branch (3ED21)
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2029

DAQ Compliance and Enforcement¹:

DEPAirQualityReports@wv.gov

¹ For all self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols, Notice of Compliance Status reports, Initial Notifications, etc.

- 3.5.4. **Fees.** The permittee shall pay fees on an annual basis in accordance with 45CSR§30-8.
[45CSR§30-8.]
- 3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The permittee shall maintain a copy of the certification on

site for five (5) years from submittal of the certification. The annual certification shall be submitted in electronic format by e-mail to the following addresses:

DAQ:
DEPAirQualityReports@wv.gov

US EPA:
R3_APD_Permits@epa.gov

[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. The semi-annual monitoring reports shall be submitted in electronic format by e-mail to the following address:

DAQ:
DEPAirQualityReports@wv.gov

[45CSR§30-5.1.c.3.A.]

- 3.5.7. **Reserved.**

- 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. Reserved.
 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 email. 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. None.

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** – *To Prevent and Control Particulate Matter Air Pollution from Materials Handling, Preparation, Storage, and Other Sources of Fugitive Particulate Matter* – 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** – *Regulation to Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds* – This rule is not applicable because the facility is not located in any of the affected counties.
- c. **45CSR27** – *To Prevent and Control the Emissions of Toxic Air Pollutants* – This rule does not apply because this facility does not emit Toxic Air Pollutants above the benchmark values given in 45CSR27.
- d. **40 CFR Part 63 Subpart DDDDD** – *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters* – The facility is not a major source of HAPs. Therefore, the subpart does not apply.
- e. **40 CFR Part 63 Subpart JJJJJ** – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* – This regulation does not apply since the boiler is natural gas-fired.
- f. **40 CFR Part 68** – *Risk Management Plan* – This regulation is not applicable because none of the storage thresholds are triggered.
- g. **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).

4.0 Boiler Requirements [Emission Unit ID: 003-05]

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., 45CSR13, Permit R13-2379, 4.1.1.]
- 4.1.2. Boiler #5 (003-05) shall be fired with pipeline quality natural gas. The maximum heat input and equivalent natural gas consumption rate for the boiler shall not exceed the values specified below:

Emission Unit ID	Emission Point ID	Boiler Description	Maximum Boiler Heat Input (mmBtu/hr)	Maximum Natural Gas Consumption Rate ⁽¹⁾	
				ft ³ /hr	MM ft ³ /yr
003-05	Boiler #5	Cleaver-Brooks, Model CB200-150, Serial No. 92340	8.65	8,431	73.85

⁽¹⁾ Based on burning natural gas with a heat content of 1,026 Btu/ft³. Annual consumption rate based on operating 8,760 hr/yr.

[45CSR13, Permit R13-2379, 4.1.2.]

- 4.1.3. Maximum pollutant emissions from Boiler #5 (003-05) shall not exceed the values specified in the table below:

Pollutant	Emission Factor ⁽¹⁾ (lbs/MMscf)	Maximum Emission Rate	
		lbs/hr	tons/yr
PM	7.6	0.06	0.28
NO _x	100	0.84	3.69
CO	84	0.71	3.10
VOC	5.5	0.05	0.20

⁽¹⁾ Emission factors for natural gas consumption based on AP-42, "Compilation of Air Pollutant Emission Factors," Volume 1, Chapter 1.4, updated 7/98.

[45CSR13, Permit R13-2379, 4.1.3.]

4.2. Monitoring Requirements

- 4.2.1. For the purpose of demonstrating compliance with the maximum natural gas consumption limits given in Condition 4.1.2. of this permit, the permittee shall record on a monthly basis the amount of natural gas consumed by Boiler #5 (003-05) and the rolling 12 month total amount of natural gas consumed. Such records shall be maintained in accordance with Condition 3.4.2. of this permit. [45CSR13, Permit R13-2379, 4.2.1.]

4.3. Testing Requirements

4.3.1. None.

4.4. Recordkeeping Requirements

4.4.1. None.

4.5. Reporting Requirements

4.5.1. None.

4.6. Compliance Plan

4.6.1. None.

5.0 Coil Coating Line #1 [Emission Unit ID(s): 001-01, 001-02; Emission Point ID: 12E] and Coil Coating Line #2 [Emission Unit ID(s): 008-1, 008-2, 008-3, 008-4, ~~008-5~~; Emission Point ID: 17E]

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. [45CSR§6-4.3., 45CSR13, Permit R13-2379, 5.1.2. (12E, 17E)]
- 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. [45CSR§6-4.4., 45CSR13, Permit R13-2379, 5.1.2. (12E, 17E)]
- 5.1.3. 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 RTO (4C) is 550.36 lbs/hr. The corresponding allowable particulate matter emission rate for Coil Coating Line #1 Type A incinerator is 1.49 lbs/hr for the regenerative thermal oxidizer (4C).

The capacity of the RTO (CO3) is 302 lbs/hr. The corresponding allowable particulate matter emission rate for Coil Coating Line #2 Type A incinerator is 0.82 lbs/hr for the regenerative thermal oxidizer (CO3).

[45CSR§6-4.1., 45CSR13, Permit R13-2379, 5.1.2. (12E, 17E)]

- 5.1.4. 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 R13-2379, 5.1.3. (001-02, 12E, 008-1, 008-2, 17E)]
- 5.1.5. The provisions of Condition 5.1.4. 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 R13-2379, 5.1.3. (001-02, 12E, 008-1, 008-2, 17E)]
- 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 lbs/hr. The process weight rate for Coating

Line #2 is 75,000 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 32 lbs/hr.

[45CSR§7-4.1., 45CSR13, Permit R13-2379, 5.1.3. (Coating Line #1 and Coating Line #2)]

5.1.7. No person shall cause, suffer, allow, or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained, and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.
[45CSR§7-5.1., 45CSR13, Permit R13-2379, 5.1.3.]

5.1.8. Reserved.

5.1.9. Except as provided in 40 CFR §63.5121(b), for any coil coating line for which an add-on control device is used, unless the permittee uses a solvent recovery system and conducts a liquid-liquid material balance according to 40 CFR §63.5170(e)(1), the permittee must meet the applicable operating limits specified below:

For each of the regenerative thermal oxidizers, the average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to 5.3.4.a.3.i. Continuous compliance with each operating limit must be demonstrated by:

- a. Collecting the combustion temperature data according to Condition 5.1.12.;
- b. Reducing the data to 3-hour block averages; and
- c. Maintaining the 3-hour average combustion temperature at or above the temperature limit.

The permittee must establish the operating limits during performance tests according to the requirements in 40 CFR §63.5160(d)(3) and Table 1 to 40 CFR §63.5160. The permittee must meet the operating limits established during the most recent performance test required in 40 CFR §63.5160 at all times after the permittee establishes them.

[45CSR13, Permit 13-2379, 5.1.1. and 5.1.6., 45CSR34, 40 CFR §63.5121(a) and Table 1 to Subpart SSSS of Part 63 (4C, CO3)]

5.1.10. 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 VOCs 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 R13-2379, 5.1.1. and 5.1.5., 45CSR16, 40 CFR §60.460(a), §§60.462(a)(2) and (a)(3) (12E, 17E)]

5.1.11. 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 the permittee uses 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 R13-2379, 5.1.1. and 5.1.6., 45CSR34, 40 CFR §63.5120(a) (12E, 17E)]

5.1.12. If complying with the requirements of the standards in Condition 5.1.11. through the use of an oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter, the permittee must:

- 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 the permittee chooses 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 $\pm 1^\circ$ Celsius, whichever is greater.
- b. For an oxidizer other than a catalytic oxidizer, to demonstrate continuous compliance with the operating limit established according to 40 CFR §63.5160(d)(3)(i), the permittee must install the thermocouple or temperature sensor in the combustion chamber at a location in the combustion zone.

[45CSR13, Permit R13-2379, 5.1.1. and 5.1.6., 45CSR34, §§63.5150(a)(3)(i) and (ii) (12E, 17E)]

- 5.1.13. a. Emissions from the Regenerative Thermal Oxidizer (Control Device ID: 4C; Emission Point: 12E) shall not exceed the following:

Pollutant		Emission Limitations	
		(lbs/hr)	(tons/yr)
PM		1.60	7.01
CO		3.76	16.45
NO _x		3.74	16.38
SO ₂		0.03	0.12
VOC		11.09	48.56
HAPs	Methyl Isobutyl Ketone	1.04	1.46
	Isophorone	2.09	2.93
	Ethylbenzene	1.38	1.94
	Formaldehyde	0.26	0.37
	Cumene	0.26	0.37
	Naphthalene	1.47	2.07
	Xylene	4.63	6.51

- b. Emissions from the Regenerative Thermal Oxidizer (RTO) (Control Device ID: CO3; Emission Point: 17E):

Pollutant	Emission Limitations	
	(lbs/hr)	(tons/yr)
CO	1.93	7.65
NO _x	3.05	12.10
SO ₂	0.01	0.05
PM	0.17	0.69
VOC	2.90	11.53
HAPs	1.10	4.13

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

- c. Emissions from the chemical dryer 008-2 shall not exceed the following limits:

Pollutant	Emission Limitations	
	(lbs/hr)	(tons/yr)
CO	0.50	1.70
NO _x	0.60	2.38
SO ₂	0.01	0.03
PM	0.05	0.18
VOC	0.03	0.13

[45CSR13, Permit R13-2379, 5.1.8. (12E, 17E)]

- 5.1.14. The RTO (4C; 12E) shall be installed, maintained, and operated so as to achieve a minimum 98% destruction efficiency in the control of Volatile Organic Compound (VOC) emissions from the CCL#1-Primer Coater (1S), CCL#1-Finish Coater (2S), CCL#1-Primer Oven (7S), and CCL#1-Finishing Oven (8S).

The RTO (CO3; 17E) shall be installed, maintained, and operated so as to achieve a minimum 98% destruction efficiency in the control of Volatile Organic Compound (VOC) emissions from the CCL#2-Coater (008-3) and CCL#2-Curing Oven (008-4), ~~and CCL#2-Quench Tank (008-5).~~

[45CSR13, Permit R13-2379, 5.1.9. (12E, 17E)]

- 5.1.15. The RTOs (4C; 12E and CO3; 17E) shall be in operation at all times when the equipment listed in 5.1.14. 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 each coating line was in operation without utilizing a thermal oxidizer and the cause for the shutdown.

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

[45CSR13, Permit R13-2379, 5.1.10. (12E, 17E)]

- 5.1.16. The maximum amount of natural gas fuel combusted in the Primer Oven (7S), Finishing Oven (8S), and RTO (4C) shall not exceed 48,000 cubic feet per hour nor 420,480,000 cubic feet per year.

The maximum amount of natural gas fuel combusted in the Chemical Dryer (008-2), Curing Oven (008-4), and RTO (CO3) shall not exceed 23,000 cubic feet per hour nor 197,064,000 cubic feet per year.

[45CSR13, Permit R13-2379, 5.1.11. (7S, 8S, 12E, 008-2, 008-4, 17E)]

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

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

[45CSR13, Permit R13-2379, 5.1.12.]

- 5.1.18. The coater rooms shall be constructed in order to achieve 100 percent capture efficiency.
[45CSR13, Permit R13-2379, 5.1.13.]

- 5.1.19. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0. and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.10., 45CSR13, Permit R13-2379, 5.1.15.]

- 5.1.20. a. The permittee must be in compliance with the applicable emission standards in Condition 5.1.11. and the operating limits in Condition 5.1.9. at all times.
- b. The permittee must operate and maintain the affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the Secretary that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the affected source.

- c. The permittee must maintain monitoring equipment at all times in accordance with Paragraph b. of this condition and keep the necessary parts readily available for routine repairs of the monitoring equipment.

[45CSR13, Permit R13-2379, 5.1.1., 45CSR34, 40 CFR §63.5140 and 40 CFR §63.5150(a)]

5.2. Monitoring Requirements

- 5.2.1. 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 40 CFR 60, 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. (12E, 008-1, 008-2, 17E)]

- 5.2.2. 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. and -2.1.b. within seventy-two (72) hours.

A 45CSR§§7A-2.1.a. and -2.1.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. and -2.1.b. (001-02)]

- 5.2.3. If thermal incineration is used, 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 5.1.10. 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. The permittee shall also record all periods (during actual coating operations) in excess of 3 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 5.1.10. was demonstrated during the most recent measurement of incinerator efficiency required by 40 CFR §60.8. The records required by 40 CFR §60.7 shall identify each such occurrence and its duration.

[45CSR13, Permit R13-2379, 5.1.5., 45CSR16, 40 CFR §60.464(c) (12E, 17E)]

- 5.2.4. If the permittee is complying with the requirements of the standards in Condition 5.1.11. through the use of a capture system and control device, the permittee must 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 compliance tests 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 5.1.11. 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 R13-2379, 5.1.6., 45CSR34, 40 CFR §63.5150(a)(4) (12E, 17E)]

- 5.2.5. The permittee shall include all coating materials (as defined in 40 CFR §63.5110) used in the affected source when determining compliance with Condition 5.1.11. To make this determination, the permittee shall use at least one of the four compliance options listed below.

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 5.4.7., and the permittee must report it in the next semi-annual compliance report required in Condition 5.5.3.

- a. *Use of “as purchased” compliant coatings:* 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 40 CFR §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 40 CFR §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 40 CFR §63.5170(b)(2).

- c. *Use of a capture system and control device:* 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 performance tests conducted according to Table 1 to 40 CFR §63.5170 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 performance tests conducted according to Table 1 to 40 CFR §63.5170 and operating limits are achieved continuously for individual coil coating lines. Compliance shall be shown by 40 CFR §63.5170(c).
- d. *Use of a combination of compliant coatings and control devices and maintaining an acceptable equivalent emission rate:* 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.

Capture and control to achieve the emission rate limit. If the permittee uses one or more capture systems and one or more control devices and limit the organic HAP emission rate to no more than 0.046 kg organic HAP emitted per liter of solids applied on a 12-month average as-applied basis, then the permittee must follow the procedure below:

If the permittee uses one or more oxidizers, the permittee must demonstrate compliance with the provisions in Condition 5.2.5.e.

- e. *Use of oxidation to demonstrate compliance.* If the permittee uses one or more oxidizers to control emissions from always controlled work stations, the permittee must follow the procedures in either paragraph 1. or 2. below:
 1. *Continuous monitoring of capture system and control device operating parameters.* Demonstrate compliance through performance tests of capture efficiency and control device efficiency and continuous monitoring of capture system and control device operating parameters as specified in paragraphs i. through xi. below:
 - i. For each oxidizer used to comply with 40 CFR §63.5120(a), determine the oxidizer destruction or removal efficiency, DRE, using the procedure in 40 CFR §63.5160(d).
 - ii. Whenever a work station is operated, continuously monitor the operating parameter established in accordance with 40 CFR §63.5150(a)(3).
 - iii. Determine the capture system capture efficiency, CE, for each work station in accordance with 40 CFR §63.5160(e).
 - iv. Whenever a work station is operated, continuously monitor the operating parameter established in accordance with 40 CFR §63.5150(a)(4).
 - v. Calculate the overall organic HAP control efficiency, R, achieved using Equation 7 of 40 CFR §63.5170.
 - vi. If demonstrating compliance with the organic HAP emission rate based on solids applied, measure the mass of each coating material applied on each work station during the month.
 - vii. If demonstrating compliance with the organic HAP emission rate based on solids applied, determine the organic HAP content of each coating material applied during the month following the procedure in 40 CFR §63.5160(b).
 - viii. If demonstrating compliance with the organic HAP emission rate based on solids applied, determine the solids content of each coating material applied during the month following the procedure in 40 CFR §63.5160(c).

- ix. Calculate the organic HAP emitted during the month, H_e , for each month:
 - A. For each work station and its associated oxidizer, use Equation 8 of 40 CFR §63.5170.
 - B. For periods when the oxidizer has not operated within its established operating limit, the control device efficiency is determined to be zero.
 - x. *Organic HAP emission rate based on solids applied for the 12-month compliance period, L_{ANNUAL} .* If demonstrating compliance with the organic HAP emission rate based on solids applied for the 12-month compliance period, calculate the organic HAP emission rate based on solids applied, L_{ANNUAL} , for the 12-month compliance period using Equation 6 of 40 CFR §63.5170.
 - xi. *Compare actual performance to performance required by compliance option.* The affected source is in compliance with 40 CFR §63.5120(a) if each oxidizer is operated such that the average operating parameter value is greater than the operating parameter value established in 40 CFR §63.5150(a)(3) for each 3-hour period, and each capture system operating parameter average value is greater than or less than (as appropriate) the operating parameter value established in 40 CFR §63.5150(a)(4) for each 3-hour period; and the requirement in either paragraph A. or B. below is met.
 - A. The overall organic HAP control efficiency, R , is 98 percent or greater for each; or
 - B. The organic HAP emission rate based on solids applied, L_{ANNUAL} , is 0.046 kg organic HAP per liter solids applied or less for the 12-month compliance period.
2. *Continuous emission monitoring of control device performance.* Use continuous emission monitors, conduct performance tests of capture efficiency, and continuously monitor a site specific operating parameter to ensure that capture efficiency is maintained. Compliance must be demonstrated in accordance with 40 CFR §63.5170(e)(2).

[45CSR13, Permit R13-2379, 5.1.6., 45CSR34, 40 CFR §63.5170(a), (b), (c), (d), and (f) (12E, 17E)]

- 5.2.6. Compliance with Condition 5.1.18. shall be shown by a pressure drop across the coating room of at least 0.007 inches H_2O . The permittee shall take pressure drop measurements at least once/shift.
[45CSR§30-5.1.c.]

5.3. Testing Requirements

- 5.3.1. At such reasonable times as the Secretary may designate, the operator of any incinerator shall be required to conduct or have conducted stack tests to determine the particulate matter loading, by using 40 CFR Part 60, Appendix A, Method 5 or other equivalent U.S. EPA approved method approved by the Secretary, in exhaust gases. Such tests shall be conducted in such manner as the Secretary may specify and be filed on forms and in a manner acceptable to the Secretary. The Secretary may, at the Secretary's option, witness or conduct such stack tests. Should the Secretary exercise his or her option to conduct such tests, the operator will provide all the 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.
[45CSR§6-7.1., 45CSR13, Permit R13-2379, 5.1.2. (12E, 17E)]

- 5.3.2. Tests that are required by the Director to determine compliance with the destruction efficiency as set forth in Condition 5.1.14. 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.

- a. Tests to determine compliance with VOC emission limits shall be conducted in accordance with Method 25 or 25A as set forth in 40 CFR Part 60, Appendix A.

[45CSR13, Permit R13-2379, 5.1.7.]

- 5.3.3. 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 40 CFR §60.463.
- b. An owner or operator shall use the following procedures for each affected facility that continuously uses a capture system and a control device that destroys VOCs (e.g., incinerator) to comply with the emission limit specified under Condition 5.1.10.
 1. Determine the overall reduction efficiency (R) for the capture system and control device according to 40 CFR §60.463(c)(2)(i).

The owner or operator may use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed. The procedure in 40 CFR §§60.463(c)(2)(i)(A), (B), and (C) shall be repeated when directed by the Administrator or when the owner or operator elects to operate the control device or capture system at conditions different from the initial performance test.

2. Calculate the volume-weighted average of the total mass of VOCs per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in 40 CFR §§60.463(c)(1)(i)(A), (B), and (C).
3. Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by the following equation: $N = G(1-R)$.
4. If the volume-weighted average mass of VOCs emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/l of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

[45CSR13, Permit R13-2379, 5.1.5., 45CSR16, 40 CFR §§60.463(b) and (c)(2) (12E, 17E)]

- 5.3.4. If a capture system and add-on control device are used to control HAP emissions on Coil Coating Line #1 and Coil Coating Line #2, the permittee must conduct periodic performance tests, except as specified in 40 CFR §63.5160(a). The permittee must conduct the first periodic performance test before March 25, 2023, unless the permittee has already conducted a performance test on or after March 25, 2018. Thereafter, the permittee must conduct a performance test no later than 5 years following the previous performance test. During each performance test, the permittee must confirm or reestablish the operating limits and determine the destruction or removal efficiency of each control device according to Condition 5.3.4.a. and the capture efficiency of each capture system according to Condition 5.3.4.b.

- a. *Control device destruction or removal efficiency.* If using an add-on control device, such as an oxidizer, to comply with the standard in Condition 5.1.11., the permittee must conduct performance tests according to Table 1 to 40 CFR §63.5160 to establish the destruction or removal efficiency of the control device or the outlet HAP concentration achieved by the oxidizer, according to the methods and procedures in paragraphs 1. and 2. of this section. During performance tests, the permittee must establish the operating limits required by 40 CFR §63.5121 according to paragraph 3. of this section.
 1. Performance tests conducted to determine the destruction or removal efficiency of the control device must be performed such that control device inlet and outlet testing is conducted simultaneously. To determine the outlet organic HAP concentration achieved by the oxidizer, only oxidizer outlet testing must be conducted. The data must be reduced in accordance with the test methods and procedures in paragraphs i. through ix.
 - i. Method 1 or 1A of 40 CFR Part 60, Appendix A, is used for sample and velocity traverses to determine sampling locations.
 - ii. Method 2, 2A, 2C, 2D, 2F, or 2G of 40 CFR Part 60, Appendix A, is used to determine gas volumetric flow rate.
 - iii. Method 3, 3A, or 3B of 40 CFR Part 60, Appendix A, used for gas analysis to determine dry molecular weight. The permittee may also use as an alternative to Method 3B, the manual method for measuring the oxygen, carbon dioxide, and carbon monoxide content of exhaust gas, ANSI/ASME PTC 19.10-1981, “Flue and Exhaust Gas Analyses” (incorporated by reference, see §63.14).
 - iv. Method 4 of 40 CFR Part 60, Appendix A, is used to determine stack gas moisture.
 - v. Methods for determining gas volumetric flow rate, dry molecular weight, and stack gas moisture must be performed, as applicable, during each test run, as specified in a.1.vii. of this condition.
 - vi. Method 25 or 25A in Appendix A-7 of Part 60 is used to determine total gaseous non-methane organic matter concentration. The permittee may use Method 18 in Appendix A-6 of Part 60 to subtract methane emissions from measured total gaseous organic mass emissions as carbon. Use the same test method for both the inlet and outlet measurements, which must be conducted simultaneously. The permittee must submit notification of the intended test method to the Administrator for approval along with notification of the performance test required under 40 CFR §63.7(b). The permittee must use Method 25A if any of the conditions described in paragraphs a.1.vi.A. through a.1.vi.D. of this condition apply to the control device.
 - A. The control device is not an oxidizer; or
 - B. The control device is an oxidizer, but an exhaust gas volatile organic matter concentration of 50 ppmv or less is required to comply with the standards in 5.1.11.; or
 - C. The control device is an oxidizer, but the volatile organic matter concentration at the inlet to the control system and the required level of control are such that they result in exhaust gas volatile organic matter concentrations of 50 ppmv or less; or
 - D. The control device is an oxidizer, but because of the high efficiency of the control device, the anticipated volatile organic matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.
 - vii. Each performance test must consist of three separate runs, except as provided by 40 CFR

§63.7(e)(3); each run must be conducted for at least 1 hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining volatile organic matter concentrations and mass flow rates, the average of the results of all runs will apply. If the permittee is demonstrating compliance with the outlet organic HAP concentration limit in paragraph c. of Condition 5.1.11., only the average outlet volatile organic matter concentration must be determined.

- viii. If the permittee is determining the control device destruction or removal efficiency, for each run, determine the volatile organic matter mass flow rates using Equation 1 of 40 CFR §63.5160(d)(1).
 - ix. For each run, determine the control device destruction or removal efficiency, DRE, using Equation 2 of 40 CFR §63.5160(d)(1).
 - x. The control device destruction or removal efficiency is determined as the average of the efficiencies determined in the three test runs and calculated in Equation 2 of 40 CFR §63.5160(d)(1).
2. The permittee must record such process information as may be necessary to determine the conditions in existence at the time of the performance test. The permittee must conduct the performance test under representative operating conditions for the coating operation. Operations during periods of start-up, shutdown, or nonoperation do not constitute representative conditions for the purpose of a performance test. The owner or operator may not conduct performance tests during periods of malfunction. The permittee must record the process information that is necessary to document operating conditions during the test and explain why the conditions represent normal operation. Upon request, the permittee must make available to the Administrator such records as may be necessary to determine the conditions of performance tests.
 3. Operating limits. If the permittee is using a capture system and add-on control device other than a solvent recovery system for which the permittee conducts a liquid-liquid material balance to comply with the requirements in 40 CFR §63.5120, the permittee must establish the applicable operating limits required by 40 CFR §63.5121. These operating limits apply to each capture system and to each add-on emission control device that is not monitored by CEMS, and the permittee must establish the operating limits during performance tests required according to the requirements in paragraph i. below.
 - i. Thermal oxidizer. If the add-on control device is a thermal oxidizer, establish the operating limits according to paragraphs A. and B. below.
 - A. During performance tests, the permittee must monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. The permittee must monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.
 - B. Use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for the thermal oxidizer.
 - b. *Capture efficiency.* The permittee must determine capture efficiency to meet the requirements of 40 CFR §63.5170(f)(1) and (2). Thus, the permittee must determine capture efficiency using the following procedures:
 1. For an enclosure that meets the criteria for a PTE, it may be assumed 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.

2. 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 40 CFR Part 51, Appendix M. The permittee may exclude never-controlled work stations from such capture efficiency determinations.
3. As an alternative to the procedures specified in paragraphs 1. and 2. of this section, the permittee may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective or the Lower Confidence Limit approach as described in Appendix A to Subpart KK of Part 63. The permittee may exclude never-controlled work stations from such capture efficiency determinations.

[45CSR13, Permit R13-2379, 5.1.6., 45CSR34, 40 CFR Table 1 to §63.5160 and §§63.5160(d) and (e) (12E, 17E)]

5.4. Recordkeeping Requirements

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

[45CSR13, Permit R13-2379, 5.4.2.]

- 5.4.2. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0., the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

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

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

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

[45CSR13, Permit R13-2379, 5.4.3.]

5.4.3. The permittee shall maintain records of the amount and type of coatings applied to the metal, and VOC and HAP emissions for the coating lines.
[45CSR13, Permit R13-2379, 5.1.14.]

5.4.4. For the purposes of determining compliance with the limits set forth in 5.1.13. and 5.1.18. of this permit, the permittee shall maintain record 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.

[45CSR13, Permit R13-2379, 5.4.4.]

5.4.5. For the purposes of determining compliance with the maximum fuel usage limits set forth in 5.1.16. of this permit, 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 R13-2379, 5.4.5.]

5.4.6. Compliance with 40 CFR 60 Subpart TT recordkeeping requirements for Coil Coating Line #1 and Coil Coating Line #2 shall be demonstrated as follows:

- a. 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.
- b. 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 R13-2379, 5.1.5., 45CSR16, 40 CFR §60.465(e), 40 CFR §60.11(d)]

5.4.7. The permittee shall maintain records specified in this Condition in accordance with 40 CFR §63.10(b)(1):

- a. Records of the coating lines on which the permittee used each compliance option and the time periods (beginning and ending dates and times) the permittee used each option;
- b. Records specified in 40 CFR §63.10(b)(2) of all measurements needed to demonstrate compliance with 40 CFR 63 Subpart SSSS, including:
 1. Continuous emission monitor data in accordance with 40 CFR §63.5150(a)(2);
 2. Control device and capture system operating parameter data in accordance with 40 CFR §§63.5150(a)(1), (3), and (4);
 3. Organic HAP content data for the purpose of demonstrating compliance in accordance with 40 CFR §63.5160(b);

4. Volatile matter and solids content data for the purpose of demonstrating compliance in accordance with 40 CFR §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 40 CFR §§63.5160(d) and (e); and
 6. Material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with 40 CFR §§63.5170(a), (b), and (d);
- c. Records specified in 40 CFR §63.10(b)(3);
 - d. Additional records specified in 40 CFR §63.10(c) for each continuous monitor system operated by the permittee in accordance with 40 CFR §63.5150(a)(2); and
 - e. For each deviation from an emission limitation reported under 40 CFR §63.5180(h), a record of the information specified below, as applicable:
 1. The date, time, and duration of the deviation, as reported under 40 CFR §63.5180(h);
 2. A list of the affected sources or equipment for which the deviation occurred and the cause of the deviation, as reported under 40 CFR §63.5180(h);
 3. An estimate of the quantity of each regulated pollutant emitted over any applicable emission limit in 40 CFR §63.5120 or any applicable operating limit established according to 40 CFR §63.5121, and a description of the method used to calculate the estimate, as reported under 40 CFR §63.5180(h); and
 4. A record of actions taken to minimize emissions in accordance with 40 CFR §63.5140(b) and any corrective actions taken to return the affected unit to its normal or usual manner of operation.

[45CSR13, Permit R13-2379, 5.1.6., 45CSR34, 40 CFR §63.5190(a)]

5.5. Reporting Requirements

- 5.5.1. 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 of VOCs and aggregate and speciated HAPs from Emission Points 12E, P16, P17, and 17E. 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 R13-2379, 5.5.1.]
- 5.5.2. Compliance with 40 CFR 60 Subpart TT reporting requirements for Coil Coating Line #1 and Coil Coating Line #2 shall be demonstrated as follows:
 - a. The permittee 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 VOCs emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under Condition 5.1.10. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semi-annually.

- b. The permittee shall also submit reports at the frequency specified in 40 CFR §60.7(c) when the incinerator temperature drops as defined under Condition 5.2.3. If no such period occurs, the owner or operator shall state this in the report.

[45CSR13, Permit R13-2379, 5.1.5., 45CSR16, 40 CFR §§60.465(c) and (d)]

- 5.5.3. The permittee shall submit the following reports to USEPA Region III and to the delegated State agency:
- a. The permittee must submit a Notification of Performance Test as specified in 40 CFR §63.7 and §63.9(e) if the permittee is complying with the emission standard using a control device. This notification and the site-specific test plan required under §63.7(c)(2) must identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The permittee may consider the operating parameter identified in the site-specific test plan to be approved unless explicitly disapproved, or unless comments received from the Secretary require monitoring of an alternate parameter.
 - b. The permittee must submit performance test reports as specified in 40 CFR §63.10(d)(2) if the permittee is using a control device to comply with the emission standards and the permittee has not obtained a waiver from the performance test requirement.
 - c. 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 semi-annual reporting period from January 1 through June 30 or the semi-annual 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 semi-annual reports pursuant to 40 CFR §70.6(a)(3)(iii)(A) or 40 CFR §71.6(a)(3)(iii)(A), the permittee 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 a.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 40 CFR §63.5170 that were used on each coating operation during the reporting period. If the permittee switched

- between compliance options during the reporting period, the permittee must report the beginning dates each option was used.
- v. A statement that there were no deviations from the applicable emission limit in 40 CFR §63.5120 or the applicable operating limit(s) established according to 40 CFR §63.5121 during the reporting period.
- d. The permittee shall submit, for each deviation occurring at CCL#1 and CCL#2, the semi-annual compliance report containing the information in paragraphs c.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, date, time, duration, and cause of deviations from an emission limit in 40 CFR §63.5120 or any applicable operating limit established according to 40 CFR §63.5121 (including unknown cause, if applicable) as applicable, and the corrective action taken.
 3. Information specified in paragraphs d.3.i. and d.3.ii. of this Condition.
 - i. Number, date, time, duration, cause (including unknown cause), and descriptions of corrective actions taken for continuous parameter monitoring systems that are inoperative (except for zero (low-level) and high-level checks).
 - ii. Number, date, time, duration, cause (including unknown cause), and descriptions of corrective actions taken for continuous parameter monitoring systems that are out of control as specified in 40 CFR §63.8(c)(7).
 4. For each deviation from an emission limit in 40 CFR §63.5120 or any applicable operating limit established according to 40 CFR §63.5121, the permittee must provide a list of the affected source or equipment, an estimate of the quantity of each regulated pollutant emitted over any emission limit in 40 CFR §63.5120, a description of the method used to estimate the emissions, and the actions that were taken to minimize emissions in accordance with 40 CFR §63.5140(b).

[45CSR34, 40 CFR §§63.5180(c), (e), (g) and (h)]

- 5.5.4. The permittee must meet the following electronic reporting requirements:
- a. The permittee must submit the results of each performance test as required in 40 C.F.R. §63.5180(e) following the procedure specified in paragraphs a.1. through a.3. of this condition.
 1. For data collected using test methods supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT website (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>) at the time of the test, the permittee must submit the results of the performance test to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). The CEDRI interface can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). Performance test data must be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT website.
 2. For data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT website at the time of the test, the permittee must submit the results of the performance test in portable document format (PDF) using the attachment module of the ERT.

3. If the permittee claims that some of the performance test information being submitted under paragraph a.1. of this condition is confidential business information (CBI), the permittee must submit a complete file generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT website, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage medium to the EPA. The electronic medium must be clearly marked as CBI and mailed to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT or alternate file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described in paragraph a.1. of this condition.

- b. The permittee shall submit the semi-annual compliance report required in 40 C.F.R. §63.5180(g) and (h) to the EPA via the CEDRI. The CEDRI interface can be accessed through the EPA's CDX (<https://cdx.epa.gov>). The permittee must use the appropriate electronic template on the CEDRI website for 40 CFR Part 63 Subpart SSSS (<https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>). For claims that some of the information required to be submitted via CEDRI is CBI, the permittee shall submit a complete report generated using the appropriate form in CEDRI, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage medium to the EPA. The electronic medium shall be clearly marked as CBI and mailed to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same file with the CBI omitted shall be submitted to the EPA via the EPA's CDX as described earlier in this paragraph.

[45CSR34, 40 CFR §§63.5181(a) and (c)]

5.6. Compliance Plan

- 5.6.1. None.